



# **THE IMMACULATE DECEPTION:**

## **Six Key Dimensions of Election Irregularities**

## Executive Summary

This report assesses the fairness and integrity of the 2020 Presidential Election by examining six dimensions of alleged election irregularities across six key battleground states. Evidence used to conduct this assessment includes more than 50 lawsuits and judicial rulings, thousands of affidavits and declarations,<sup>1</sup> testimony in a variety of state venues, published analyses by think tanks and legal centers, videos and photos, public comments, and extensive press coverage.

The matrix below indicates that significant irregularities occurred across all six battleground states and across all six dimensions of election irregularities. This finding lends credence to the claim that the election may well have been stolen from President Donald J. Trump.

|                                    | ARIZONA | GEORGIA | MICHIGAN | NEVADA | PENNSYLVANIA | WISCONSIN |
|------------------------------------|---------|---------|----------|--------|--------------|-----------|
| Outright Voter Fraud               | ✓       | ✓       | *        | ✓      | *            | ✓         |
| Ballot Mishandling                 |         | ✓       | ✓        | ✓      | ✓            | ✓         |
| Contestable Process Fouls          | ✓       | ✓       | ✓        | ✓      | ✓            | ✓         |
| Equal Protection Clause Violations | ✓       | ✓       | ✓        | ✓      | ✓            | ✓         |
| Voting Machine Irregularities      | ✓       | ✓       | ✓        | ✓      | ✓            | *         |
| Significant Statistical Anomalies  | ✓       | ✓       | ✓        | ✓      |              | ✓         |

✓ = Wide-Spread Evidence   \* = Some Evidence

From the findings of this report, it is possible to infer what may well have been a coordinated strategy to effectively stack the election deck against the Trump-Pence ticket. Indeed, the observed patterns of election irregularities are so consistent across the six battleground states that they suggest a coordinated strategy to, if not steal the election outright, strategically game the election process in such a way as to “stuff the ballot box” and unfairly tilt the playing field in favor of the Biden-Harris ticket. Topline findings of this report include:

- The weight of evidence and patterns of irregularities are such that it is irresponsible for anyone – especially the mainstream media – to claim there is “no evidence” of fraud or irregularities.
- The ballots in question because of the identified election irregularities are more than sufficient to swing the outcome in favor of President Trump should even a relatively small portion of these ballots be ruled illegal.

- All six battleground states exhibit most, or all, six dimensions of election irregularities. However, each state has a unique mix of issues that might be considered “most important.” To put this another way, all battleground states are characterized by the same or similar election irregularities; but, like Tolstoy’s unhappy families, each battleground state is different in its own election irregularity way.
- This was theft by a thousand cuts across six dimensions and six battleground states rather than any one single “silver bullet” election irregularity.
- In refusing to investigate a growing number of legitimate grievances, the anti-Trump media and censoring social media are complicit in shielding the American public from the truth. This is a dangerous game that simultaneously undermines the credibility of the media and the stability of our political system and Republic.
- Those journalists, pundits, and political leaders now participating in what has become a Biden Whitewash should acknowledge the six dimensions of election irregularities and conduct the appropriate investigations to determine the truth about the 2020 election. If this is not done before Inauguration Day, we risk putting into power an illegitimate and illegal president lacking the support of a large segment of the American people.
- The failure to aggressively and fully investigate the six dimensions of election irregularities assessed in this report is a signal failure not just of our anti-Trump mainstream media and censoring social media but also of both our legislative and judicial branches.
  - Republican governors in Arizona and Georgia together with Republican majorities in both chambers of the State Legislatures of five of the six battleground states – Arizona, Georgia, Michigan, Pennsylvania, and Wisconsin<sup>2</sup> – have had both the power and the opportunity to investigate the six dimensions of election irregularities presented in this report. Yet, wilting under intense political pressure, these politicians have failed in their Constitutional duties and responsibilities to do so – and thereby failed both their states and this nation as well as their party.
  - Both State courts and Federal courts, including the Supreme Court, have failed the American people in refusing to appropriately adjudicate the election irregularities that have come before them. Their failures pose a great risk to the American Republic.
- If these election irregularities are not fully investigated prior to Inauguration Day and thereby effectively allowed to stand, this nation runs the very real risk of never being able to have a fair presidential election again – with the down-ballot Senate races scheduled for January 5 in Georgia an initial test case of this looming risk.

## I. Introduction

At the stroke of midnight on Election Day, President Donald J. Trump appeared well on his way to winning a second term. He was already a lock to win both Florida and Ohio; and no Republican has ever won a presidential election without winning Ohio while only two Democrats have won the presidency without winning Florida.<sup>3</sup>

At the same time, the Trump-Pence ticket had substantial and seemingly insurmountable leads in Georgia, Pennsylvania, Michigan, and Wisconsin. If these leads held, these four key battleground states would propel President Trump to a decisive 294 to 244 victory in the Electoral College.

Shortly after midnight, however, as a flood of mail-in and absentee ballots began entering the count, the Trump red tide of victory began turning Joe Biden blue. As these mail-in and absentee ballots were tabulated, the President's large leads in Georgia, Pennsylvania, Michigan, and Wisconsin simply vanished into thin Biden leads.

At midnight on the evening of November 3, and as illustrated in Table 1, President Trump was ahead by more than 110,000 votes in Wisconsin and more than 290,000 votes in Michigan. In Georgia, his lead was a whopping 356,945; and he led in Pennsylvania by more than half a million votes. By December 7, however, these wide Trump leads would turn into razor thin Biden leads – 11,779 votes in Georgia, 20,682 votes in Wisconsin, 81,660 votes in Pennsylvania, and 154,188 votes in Michigan.

**Table 1: A Trump Red Tide Turns Biden Blue**

|                          | GEORGIA | PENNSYLVANIA | MICHIGAN | WISCONSIN |
|--------------------------|---------|--------------|----------|-----------|
| Trump Lead Midnight 11/3 | 356,945 | 555,189      | 293,052  | 112,022   |
| Biden "Lead" 12/15       | 11,779  | 81,660       | 154,188  | 20,682    |

Sources: Associated Press & Edison/Decision Desk HQ  
\*Midnight based on state's time zone

There was an equally interesting story unfolding in Arizona and Nevada. While Joe Biden was ahead in these two additional battleground states on election night – by just over 30,000 votes in Nevada and less than 150,000 votes in Arizona – internal Trump Campaign polls predicted the President would close these gaps once all the votes were counted. Of course, this never happened.

In the wake of this astonishing reversal of Trump fortune, a national firestorm has erupted over the fairness and integrity of one of the most sacrosanct institutions in America – our presidential election system. Critics on the Right and within the Republican Party – including President Trump himself – have charged that the election was stolen. They have backed up these damning charges with more than 50 lawsuits,<sup>4</sup> thousands of supporting affidavits and declarations, and seemingly incriminating videos, photos, and first-hand accounts of all manner of chicanery.<sup>5</sup>

Critics on the Left and within the Democrat Party have, on the other hand, dismissed these charges as the sour grapes of a whining loser. Some of these critics have completely denied any fraud, misconduct or malfeasance altogether. Others have acknowledged that while some election irregularities may have existed, they strenuously insist that these irregularities are not significant enough to overturn the election.

There is a similar Battle Royale raging between large anti-Trump segments of the so-called “mainstream” media and alternative conservative news outlets. Across the anti-Trump mainstream media diaspora – which includes most prominently print publications like the New York Times and Washington Post and cable TV networks like CNN and MSNBC – a loud chorus of voices has been demanding that President Trump concede the election.

These same anti-Trump voices have been equally quick to denounce or discredit anyone – especially anyone within their own circle – that dares to investigate what may well turn out to be THE biggest political scandal in American history. Social media outlets like Facebook, Twitter, and YouTube likewise have been actively and relentlessly censoring anyone who dares to call the results of the election into question.

In contrast, alternative news outlets, primarily associated with the American conservative movement, have provided extensive, in-depth coverage of the many issues of fraud, misconduct, and other irregularities that are coming to light. From Steve Bannon’s War Room Pandemic<sup>6</sup> and John Solomon’s Just the News<sup>7</sup> to Raheem Kassam’s National Pulse,<sup>8</sup> to Newsmax,<sup>9</sup> and One America News Network,<sup>10</sup> Americans hungry for facts and breaking developments have been able to find such critical information only by following this alternative coverage.

That the American public is not buying what the Democrat Party and the anti-Trump media and social media are selling is evident in public opinion polls. For example, according to a recent Rasmussen poll: “Sixty-two percent (62%) of Republicans say it is ‘Very Likely the Democrats stole the election’” while 28% of Independents and 17% of Democrats share that view.<sup>11</sup>

If, in fact, compelling evidence comes to light proving the election was indeed stolen after a *fait accompli* Biden inauguration, we as a country run the very real risk that the very center of our great American union will not hold.

To put this another way, if the greatest democracy in world history cannot conduct a free and fair election, and if much of the mainstream media of this country won’t even fully investigate what is becoming a growing mountain of evidence calling into question the election result, there is little chance that our democracy and this Republic will survive as we know it. It is therefore critical that we get to the bottom of this matter. That is the purpose of this report.

## II. Six Dimensions of Election Irregularities across Six Battleground States

This report assesses the fairness and integrity of the 2020 presidential election across six key battleground states where the Democrat candidate Joe Biden holds a slim lead, and the results continue to be hotly contested. As documented in the extensive endnotes, the evidence used to conduct this assessment includes more than 50 lawsuits and judicial rulings, thousands of affidavits and declarations, testimony presented in a variety of state venues, published reports and analyses by think tanks and legal centers, videos and photos, public comments and first-hand accounts, and extensive press coverage.

From a review and analysis of this evidence, six major dimensions of alleged election irregularities have been identified and assessed on a state-by-state basis across six key battleground states: Arizona, Georgia, Michigan, Nevada, Pennsylvania, and Wisconsin. These six dimensions include outright voter fraud, ballot mishandling, contestable process fouls, Equal Protection Clause violations, voting machine irregularities, and significant statistical anomalies.

The matrix in Table 2 provides an overview of the presence or absence of each of the six dimensions of alleged election irregularities in each of the six battleground states. Column 1 lists each of the six dimensions along with the alleged Biden victory margin and the possible illegal ballots due to election irregularities. Columns 2 through 7 in the matrix then indicate the presence or absence of the election irregularities in any given state.

Note that a checkmark in matrix cell indicates there is *widespread* evidence in a given state for a particular dimension of election irregularity while a star indicates there is at least *some* evidence.

**Table 2: 2020 Alleged Election Irregularities across the Six Battleground States**

|                                    | ARIZONA  | GEORGIA  | MICHIGAN | NEVADA   | PENNSYLVANIA | WISCONSIN |
|------------------------------------|----------|----------|----------|----------|--------------|-----------|
| Outright Voter Fraud               | ✓        | ✓        | *        | ✓        | *            | ✓         |
| Ballot Mishandling                 |          | ✓        | ✓        | ✓        | ✓            | ✓         |
| Contestable Process Fouls          | ✓        | ✓        | ✓        | ✓        | ✓            | ✓         |
| Equal Protection Clause Violations | ✓        | ✓        | ✓        | ✓        | ✓            | ✓         |
| Voting Machine Irregularities      | ✓        | ✓        | ✓        | ✓        | ✓            | *         |
| Significant Statistical Anomalies  | ✓        | ✓        | ✓        | ✓        |              | ✓         |
| Biden “Victory” Margin             | 10,457   | 11,779   | 154,188  | 33,596   | 81,660       | 20,682    |
| Possible Illegal Ballots           | >100,000 | >400,000 | Unknown  | >100,000 | >600,000     | >200,000  |

✓ = Wide-Spread Evidence    \* = Some Evidence

Two key points stand out immediately from the matrix. First, significant irregularities appear to be ubiquitous across the six battleground states. Only Arizona is free of any apparent widespread ballot mishandling while only Pennsylvania lacks significant statistical anomalies. The rest of the matrix in Table 2 is a sea of checkmarks and occasional stars.

Second, if one compares the alleged Biden victory margin in Column 7 of the figure with the possible illegal ballots in Column 8, it should be clear that the number of possible illegal ballots dwarfs the alleged Biden victory margin in five of the six states.

For example, the alleged Biden victory margin in Nevada is 33,596 votes yet the number of ballots in question is more than three times that. In Arizona, which has the narrowest alleged Biden victory margin at 10,457 votes, there are nearly 10 times that number of possible illegal ballots; and the ratio of the alleged Biden vote lead to possible illegal ballots is even higher for Georgia.

Only Michigan is the exception to the rule. This is not because it is likely to be a true exception but simply because there remains insufficient estimates of how the various types of irregularities in Michigan translate into possible illegal votes.

Clearly, based on this matrix, the American people deserve a definitive answer as to whether this election was stolen from Donald J. Trump. Absent a thorough investigation prior to Inauguration Day, a cloud and a stain will hang over what will be perceived by many Americans as an illegitimate Biden administration.

The next six sections of this report examine in more detail each of the six dimensions of alleged election irregularities.

### III. Outright Voter Fraud

*Outright voter fraud* ranges from the large-scale manufacturing of fake ballots, bribery, and dead voters to ballots cast by ineligible voters such as felons and illegal aliens, ballots counted multiple times, and illegal out-of-state voters. Table 3 provides an overview across the six battleground states of the various types of outright voter fraud that have been alleged to be present.

**Table 3: Outright Voter Fraud in the 2020 Presidential Election**

|                                                                      | ARIZONA | GEORGIA | MICHIGAN | NEVADA | PENNSYLVANIA | WISCONSIN |
|----------------------------------------------------------------------|---------|---------|----------|--------|--------------|-----------|
| Bribery                                                              | ✓       |         |          | ✓      |              |           |
| Fake Ballot Manufacturing & Destruction of Legally Cast Real Ballots | ✓       | ✓       |          | *      | *            |           |
| Indefinitely Confined Voter Abuses                                   |         | *       |          |        | *            | ✓         |
| Ineligible Voters & Voters Who Voted in Multiple States              | ✓       | ✓       |          | ✓      |              |           |
| Dead Voters & Ghost Voters                                           | ✓       | ✓       | *        | ✓      | *            |           |
| Counting Ballots Multiple Times                                      |         |         | *        | *      | *            | ✓         |
| Illegal Out-of-State Voters                                          | ✓       | ✓       |          | ✓      | *            |           |

✓ = Wide-Spread Evidence   \* = Some Evidence

From the figure, we see that different types of fraud may be present in all six states. Let's more precisely define each of these different types of fraud using examples that are designed to be illustrative rather than exhaustive.

#### Bribery

In a voter fraud context, *bribery* refers to the corrupt solicitation, acceptance, or transfer of value in exchange for official action, such as voter registration or voting for a preferred candidate.<sup>12</sup> At least in Nevada, there is a slam dunk case that such bribery occurred.

What is so stunning about the Nevada case is the brazen disregard for our federal bribery laws. In the Silver State, in an effort orchestrated by the Biden campaign, Native Americans appear to have traded their votes not for pieces of silver but rather for Visa gift cards, jewelry, and other “swag.”<sup>13</sup> According to the Epoch Times, such vote buying schemes also may have occurred in eight other states, including Arizona and Wisconsin.<sup>14</sup>

## Fake Ballot Manufacturing and Destruction of Legally Cast Real Ballots

*Fake ballot manufacturing* involves the fraudulent production of ballots on behalf of a candidate; and one of the most disturbing examples of possible fake ballot manufacturing involves a truck driver who has alleged in a sworn affidavit that he picked up large crates of ballots in New York and delivered them to a polling location in Pennsylvania.<sup>15</sup> There may be well over 100,000 ballots involved, enough fake ballots alone to have swung the election to Biden in the Keystone State.

Likewise in Pennsylvania, there is both a Declaration and a photo that suggests a poll worker used an unsecured USB flash drive to dump an unusually large cache of votes onto vote tabulation machines. The resultant tabulations did not correlate with the mail-in ballots scanned into the machines.<sup>16</sup>

Arguably the most flagrant example of possible fake ballot manufacturing on behalf of Joe Biden may have occurred at the State Farm Arena in Atlanta, Georgia. The possible perpetrators were caught *in flagrante delicto* on surveillance video.

In one version of this story, poll watchers and observers as well as the media were asked to leave in the middle of the night after a suspicious water leak. Once the room was cleared, several election officials pulled out large boxes of ballots from underneath a draped table. They then proceeded to tabulate a quantity of fake manufactured ballots estimated to be in the range of tens of thousands.<sup>17</sup> Note that a large surge in Biden votes following the tabulation of these ballots can be clearly observed after these votes were processed.<sup>18</sup>

Despite what appears to be damning evidence of a possible crime, a spate of stories appeared across the anti-Trump media diaspora dismissing any concerns. According to these whitewash stories, these were regular and authorized ballot boxes, observers in the media were not asked to leave but simply left on their own, and it is perfectly acceptable to count ballots in the absence of observers.<sup>19</sup> Or so the spin goes.

Of course, this is precisely the kind of incident that should be fully investigated both by Georgia's Attorney General as well as by the Federal Department of Justice. Yet it remains unclear as to whether such investigations are underway. Meanwhile, the videotape itself, absent an adequate explanation, has contributed to the current climate of skepticism surrounding the fairness and integrity of the election.

Finally, as an example of the possible *destruction of legally cast real ballots* there is this allegation from a court case filed in the United States District Court for the District of Arizona: Plaintiffs claim that over 75,000 absentee ballots were reported as unreturned when they were actually returned. These absentee ballots were then either lost or destroyed (consistent with allegations of Trump ballot destruction) and/or were replaced with blank ballots filled out by election workers or other third parties.<sup>20</sup>

## Indefinitely Confined Voter Abuses

*Indefinitely confined voters* are those voters unable to vote in person because of old age or some disability. There are two types of possible abuses associated with such indefinitely confined voters.

The first kind of abuse involves exploiting the elderly or the infirm by effectively hijacking their identities and votes. For example, in Georgia, the family of an elderly man in a nursing home facility discovered that a mail-in ballot had been requested and submitted under his voter registration identity, yet it was done without his consent.<sup>21</sup> In a similar situation in Pennsylvania, two parents and their daughter who has Downs Syndrome went to vote in person and discovered that a mail-in ballot had both been requested and submitted for the daughter without her consent.<sup>22</sup>

The second kind of indefinitely confined voter abuse is far more consequential, at least in the state of Wisconsin. The key allegation here in several court filings is that “bad-faith voters” registering as “indefinitely confined” intentionally broke “Wisconsin election law to circumvent election integrity photo identification requirements.” In a nutshell, they were able to vote without showing a voter identification photo and therefore underwent a far less rigorous I.D. check than would otherwise have been conducted.

This abuse happened, according to one press account, after “clerks in Dane and Milwaukee counties offered illegal advice that encouraged individuals to use indefinite confinement as a way to ignore the state’s photo I.D. requirement.”<sup>23</sup> The Trump side has called this correctly an open invitation to fraud; and stories and pictures abound of Wisconsin voters who registered as indefinitely confined but were seen also attending weddings, riding their bikes, going on vacation, and otherwise be anything but confined.<sup>24</sup>

Here is what is most important about this particular type of election fraud: In the wake of the expanded definition of indefinitely confined voters – a definition ruled legally *incorrect* by the Wisconsin Supreme Court<sup>25</sup> – the number of indefinitely confined voters surged from just under 70,000 voters in 2019 to over 200,000 in 2020.<sup>26</sup> This 130,000 vote increment of new indefinitely confined voters is more than five times the Biden victory margin in Wisconsin.

## Ineligible Voters and Voters Who Voted in Multiple States

*Ineligible voters* include felons deemed ineligible, underage citizens, nonregistered voters, illegal aliens, illegal out-of-state voters, and voters illegally using a post office box as an address.<sup>27</sup>

In a court filing by the Trump campaign legal team, lead counsel Ray Smith provided a list of more than 70,000 allegedly ineligible voters casting ballots in Georgia in the 2020 election.<sup>28</sup> Also in Georgia, over 20,000 people appear to have filed a Notice of Changed Address form to the Georgia state government or had other indications of moving out of state. Yet, these clearly ineligible out-of-state voters appeared to have remained on the voter rolls and voted in the 2020 election.<sup>29</sup>

As additional data points regarding ineligible out-of-state voters, there are these: Between 80 and 100 self-proclaimed Black Lives Matter-affiliated members from other states have admitted to having voted in Pennsylvania.<sup>30</sup>

As for those *voters who vote in multiple states*, one lawsuit claims that roughly 15,000 mail-in or absentee ballots were received in Nevada from voters who were known to have voted in other states.<sup>31</sup> It is useful to note here that in Nevada, poll workers allegedly were not consistent in their procedures when checking voters in to vote about whether they accepted California or Nevada Voter Identification as proof of eligibility to register to vote.<sup>32</sup>

### Dead Voters and Ghost Voters

According to widespread evidence, there was a surprising number of ballots cast across several key battleground states by deceased voters, sparking one wag to quip, in reference to a classic Bruce Willis movie, this was the “Sixth Sense” election – I see dead people voting.

In Pennsylvania, for example, a statistical analysis conducted by the Trump Campaign matching voter rolls to public obituaries found what appears to be over 8,000 confirmed dead voters successfully casting mail-in ballots.<sup>33</sup> In Georgia – underscoring the critical role any given category of election irregularities might play in determining the outcome – the estimated number of alleged deceased individuals casting votes almost exactly equals the Biden victory margin.

In Michigan, according to one first-hand account offered in a declaration, computer operators at a polling location in Detroit were manually adding the names and addresses of thousands of ballots to vote tabulation systems with voters who had birth dates in 1900.<sup>34</sup> And in Nevada, a widower since 2017 saw that his deceased wife had successfully cast a mail-in ballot on November 2, 2020, three and a half years after her death.<sup>35</sup>

It may be useful to note here that dead voters played a critical role in stealing the election from Richard Nixon, a theft orchestrated by Mayor Richard Daley and his Chicago political machine. According to one report “more than 3,000 votes [were] cast in the names of individuals who were dead, and more than 31,000 individuals voted twice in different locations in the city.” President Kennedy’s victory margin in Illinois was less than 9,000 votes.

On the Ghost Voter front, a “Ghost Voter” is a voter who requests and submits a ballot under the name of a voter who no longer resides at the address where that voter was registered. In Georgia for example, it is alleged that over 20,000 absentee or early voters – almost twice the Biden victory margin – cast their ballots after having moved out of state.<sup>36</sup> In Nevada, a poll worker reported that there were as many as 50 ballots per day being delivered to homes vacated by their former residents.<sup>37</sup>

### Counting Ballots Multiple Times

*Counting ballots multiple times* occurs most egregiously when batches of ballots are repeatedly rescanned and re-tabulated in electronic voting machines. It can also happen when the same person votes multiple times within the same day. Evidence of these particular kinds of “ballot stuffing” are present across all six battleground states.

For example, in Wisconsin, poll workers were observed running ballots through tabulation machines more than once.<sup>38</sup> In Wayne County, Michigan, Republican poll watchers observed canvassers re-scanning batches of ballots through vote tabulation machines up to 3 to 4 times.<sup>39</sup>

In Pennsylvania, a poll worker observed a woman vote twice in the same day by changing her appearance.<sup>40</sup> Another poll worker observed people in voting lines in one corner of a polling location voting, and then coming to another polling location at the other side of the building to vote.<sup>41</sup> Still another poll worker witnessed a woman voting twice at voting machines on Election Day.<sup>42</sup>

## IV. Ballot Mishandling

*Ballot mishandling* represents the second major dimension of alleged election irregularities in the 2020 presidential election. As Table 4 illustrates, this is a multifaceted problem across the battleground states. Let's work our way through this figure starting with the failure to properly check the identification of voters.

**Table 4: Ballot Mishandling in the Battleground States**

|                                                                     | ARIZONA | GEORGIA | MICHIGAN | NEVADA | PENNSYLVANIA | WISCONSIN |
|---------------------------------------------------------------------|---------|---------|----------|--------|--------------|-----------|
| No Voter I.D. Check                                                 |         |         | *        | *      |              | ✓         |
| Signature Match Check Abuses                                        |         | ✓       |          | ✓      | ✓            |           |
| "Naked Ballots" Lacking Outer Envelope                              |         |         | *        |        | ✓            |           |
| Broken Chain of Custody & Unauthorized Ballot Handling or Movements |         | ✓       | ✓        | ✓      | ✓            | ✓         |
| Ballots Accepted Without Postmarks & Backdating of Ballots          |         |         | *        |        |              | *         |

✓ = Wide-Spread Evidence   \* = Some Evidence

### No Voter I.D. Check

It is critical for the integrity of any election for poll workers to properly verify a voter's identity and registration when that voter comes in to cast an in-person ballot. However, there is at least some evidence of a lack of adequate voter ID check across several of the battleground states.

For example, in Michigan, the chairperson of a polling location permitted an individual to vote without presenting voter identification and another with only a photocopy of a driver's license.<sup>43</sup>

In Nevada, poll workers were instructed to advise people who wanted to register to vote and did not have proper Nevada IDs or Driver's Licenses to do the following: These unregistered voters could go outside into the parking lot and make an appointment with the Department of Motor Vehicles as late as January 2021 to obtain a Nevada Driver's License as proof of their identity. They could then bring in confirmation of their DMV appointment in either paper or digital form; and that would be sufficient to allow them to be registered.<sup>44</sup>

### Signature Matching Abuses

It is equally critical that ballot counters legally verify mail-in and absentee ballots by checking if the signatures on the outer envelopes match the voters' registration records.<sup>45</sup> Note, however, that a variety of signature matching abuses represent a major issue in Nevada, Pennsylvania, and especially in Georgia.

In Georgia, contrary to state law, the Secretary of State entered into a Consent Decree with the Democrat Party that weakened signature matching to just one verification instead of two. This illegal weakening of the signature match test has called into question more than 1.2 million mail-in ballots cast in Georgia.<sup>46</sup>

Georgia is not the only state where signature match check abuses have surfaced. Nevada law requires that *persons* – not machines – review all signatures and ballots. Yet the Clark County Registrar of Voters used a defective signature matching computer system called Agilis to conduct such checks.<sup>47</sup> As will be discussed further below, this problem of machines replacing humans contrary to Nevada state law was compounded by the fact that the Agilis system has an unacceptably low accuracy rate, making it easier for illegal ballots to slip through its screen.<sup>48</sup>

Signature match abuses also surfaced in Wisconsin where mandatory voter information certifications for mail-in ballots were reduced and/or eliminated, again contrary to state law. As noted in one lawsuit, this change “undermined the authority of the state legislature, reduced the security and integrity of the election by making it easier to engage in mail-in ballot fraud and created another standard-less rule in conflict with the clear terms of the Wisconsin Election Code, preventing uniform treatment of absentee ballots throughout the State.”<sup>49</sup>

### “Naked Ballots” Lacking Outer Envelope

A *naked ballot* is a mail-in or absentee ballot lacking an outer envelope with the voter's signature on it. It is illegal to accept the naked ballot as the outer envelope provides the only way to verify a voter's identity.

The illegal acceptance of naked ballots appears to be particularly acute in Pennsylvania as a result of ill-advised “guidance” issued by the Secretary of State – a registered Democrat<sup>50</sup> – that such naked ballots be counted.

This issuance of such guidance, in violation of state law,<sup>51</sup> appears to be a blatant attempt by a Democrat politician to boost the count for Joe Biden as it was clear that Democrats would be voting disproportionately higher through mail-in ballots. This incident is especially egregious because when the Pennsylvania Supreme Court rejected this guidance, the Secretary of State refused to issue new guidance directing election officials to NOT count non-compliant mail-in or absentee ballots.<sup>52</sup>

### Broken Chain of Custody & Unauthorized Ballot Handling or Movements

The maintenance of a proper chain of custody for ballots cast is the linchpin of fair elections. Chain of custody is broken when a ballot is fraudulently transferred, controlled, or moved without adequate supervision or oversight.<sup>53</sup>

While chain of custody issues can apply to all ballots, the risk of a broken chain of custody is obviously higher for mail-in and absentee ballots. This is because the ballots have to go through more hands.

In the 2020 presidential election, the increased use – often illegal use – of unsupervised drop boxes arguably has enhanced the risk of a broken chain of custody. So, too, has the increased practice of so-called “ballot harvesting” whereby third parties pick up ballots from voters and deliver them to drop boxes or directly to election officials.

Both drop boxes and ballot harvesting provide opportunities for bad actors to insert fraudulent ballots into the election process. That this is a very serious matter is evident in this observation by BlackBoxVoting.org: “In court cases, chain of custody violations can result in refusal to admit evidence or even throwing a case out. In elections, chain of custody violations can result in ‘incurable uncertainty’ and court orders to redo elections.”<sup>54</sup> (emphasis added)

As an example of the drop box problem, in Pennsylvania, ballots were illegally dumped into drop boxes at the Nazareth ballot drop center in violation of state law.<sup>55</sup> Likewise in Pennsylvania, a man caught on videotape and photos came out of an unmarked Jeep extracting ballots from an unsupervised ballot drop-box to bring them into a ballot counting center. That same man was observed to come back with an empty ballot container to place in the unsupervised drop box.<sup>56</sup>

In Wisconsin, the state’s Election Committee illegally positioned five hundred drop boxes for collection of absentee ballots across the state. However, these drop boxes were disproportionately located in urban areas which tend to have much higher Democrat registration, thereby favoring the candidacy of Joe Biden. Note: Any use of a drop box in Wisconsin is illegal by statute. Therefore, the votes cast through them cannot be legally counted in any certified election result.<sup>57</sup>

As an example of ballot harvesting – in this case at the front end of the process – 25,000 ballots were requested from nursing home residents in Pennsylvania at the same time.<sup>58</sup>

As additional examples of a possible broken chain of custody, there are these: Large bins of absentee ballots arrived at the Central Counting Location in Wisconsin with already opened envelopes, meaning that ballots could have been tampered with.<sup>59</sup> They were nonetheless counted.

Also in Wisconsin, an election worker was observed moving bags of blank ballots into a vehicle and then driving off without supervision.<sup>60</sup> There is also the previously referenced case whereby a truck driver has offered a firsthand account of moving large quantities of fake manufactured ballots from New York to Pennsylvania.

As a final note on the unauthorized handling or movement of ballots, there is the problem of *illegal ballot counters*. These are persons who not legally permitted and/or certified to be counting ballots.

In one curious case, an individual who worked as an official photographer for Kamala Harris' campaign in 2019<sup>61</sup> was alleged to be involved in scanning ballots in Floyd County, Georgia. Ballot counters cannot have any ties to candidates in a presidential election.

### Ballots Accepted Without Postmarks and Backdating of Ballots

Across all of the battleground states, it is against state law for poll workers to count either mail-in or absentee ballots that lack postmarks. It is also illegal to backdate ballots so that they may be considered as having met the election deadline for the receipt and counting of such ballots. There is some evidence of these irregularities in several of the battleground states.

For example, in Wisconsin, according to one Declaration, employees of the United States Postal Service (USPS) in Milwaukee were repeatedly instructed by two managers to backdate late-arriving ballots so they could still be counted.<sup>62</sup> In addition, the USPS was alleged to have backdated as many as 100,000 ballots in Wisconsin.<sup>63</sup>

Similarly, in Detroit, Michigan, as noted in a court case, poll workers were instructing ballot counters to backdate absentee ballots so they could be counted.<sup>64</sup> One poll watcher also observed ballots in Michigan being run through vote tabulation machines without postmarks on them.<sup>65</sup>

## V. Contestable Process Fouls

Contestable process fouls represent the third dimension of election irregularities in the 2020 presidential election. The various forms such process fouls can take are illustrated in Table 5 across the six battleground states.

**Table 5: Contestable Process Fouls in the Battleground States**

|                                                                | ARIZONA | GEORGIA | MICHIGAN | NEVADA | PENNSYLVANIA | WISCONSIN |
|----------------------------------------------------------------|---------|---------|----------|--------|--------------|-----------|
| Abuses of Poll Watchers & Observers                            | ✓       | ✓       | ✓        | ✓      | ✓            | ✓         |
| Mail-In & Absentee Ballot Rules Violated Contrary to State Law |         | ✓       |          |        | ✓            | ✓         |
| Voters Not Properly Registered Allowed to Vote                 |         | ✓       | *        | ✓      | *            | ✓         |
| Illegal Campaigning at Poll Locations                          |         |         | *        |        | *            | *         |
| Ballots Cured by Poll Workers or Voters Contrary to Law        | ✓       | ✓       | ✓        | ✓      | ✓            | ✓         |

✓ = Wide-Spread Evidence   \* = Some Evidence

### Abuses of Poll Watchers and Observers

Central to the fairness and integrity of any election is the processes by which observers monitor the receipt, opening, and counting of the ballots. You can see in the Table 5 that poll watcher and observer abuses were present across all six battleground states.

In Georgia,<sup>66</sup> Michigan,<sup>67</sup> and Pennsylvania,<sup>68</sup> poll watchers and observers were denied entry to ballot counting centers by Judges of Elections and other poll workers. This was despite presenting proper certification and identification.

In Georgia,<sup>69</sup> Michigan,<sup>70</sup> Nevada,<sup>71</sup> and Pennsylvania,<sup>72</sup> Republican poll watchers were also forced inside confined areas, thereby limiting their view. In some cases, this confinement was enforced by local law enforcement.

Across these four battleground states, Republican poll watchers were also directed to stand at unreasonably lengthy distances from ballot counters. In Michigan – arguably the “first among equals” when it comes to observer abuses – poll workers put up poster boards on the windows of the room where ballots were being processed and counted so as to block the view.<sup>73</sup> In Pennsylvania, tens of thousands of ballots were processed in back rooms where poll observers were prohibited from being able to observe at all.<sup>74</sup>

This is an extremely serious matter because it is these poll watchers and observers who represent the frontline defenders of a fair election process. Their job is to make sure all ballots are handled properly and tabulated accordingly. They seek to answer questions like: Is there a signature match process being conducted? Does each ballot have an outer envelope or is it a naked ballot? Are ballots being run more than once through the tabulation machines?

When poll watchers or observers are barred from viewing or forced to view from unacceptably large distances, these watchdogs cannot accurately answer these questions. They, therefore, cannot fulfill their critical watchdog function.

#### Mail-In Ballot and Absentee Ballot Rules Violated Contrary to State Law

In Georgia, more than 300,000 individuals were permitted to vote who had applied for an absentee ballot more than 180 days prior to the Election Day. This is a clear violation of state law.<sup>75</sup>

In both Pennsylvania and Wisconsin, Democrat election officials acted unilaterally to accept both mail-in and absentee ballots after Election Day. State Republicans have argued this is contrary to state law.

In Pennsylvania, absentee and mail-in ballots were accepted up to three days after Election Day.<sup>76</sup> On November 7<sup>th</sup>, in anticipation of a legal challenge, the United States Supreme Court ordered that the approximately 10,000 absentee and mail-in ballots that had arrived past November 3<sup>rd</sup> be separated from ballots that had arrived on Election Day.<sup>77</sup> This direction notwithstanding, a poll watcher reported on November 7<sup>th</sup> that, in Delaware County, ballots received the previous night were not being separated from ballots received on Election Day, contrary to state law.<sup>78</sup>

Wisconsin state law does not permit early voting. Nonetheless, city officials in the Democrat stronghold of Madison, Wisconsin assisted in the creation of more than 200 “Democracy in the Park” illegal polling places.

These *faux* polling places were promoted and supported by the Biden campaign. They provided witnesses for absentee ballots and acted in every way like legal polling places. Moreover, they received ballots outside of the limited 14-day period preceding an election that is authorized by statute for in-person or absentee balloting. These were clear violations of state law.<sup>79</sup>

## Voters Not Properly Registered Allowed to Vote

One of the jobs of poll workers is to ensure that in-person voters are legally registered and are who they say they are. Across at least three of the six battleground states – Georgia, Nevada, and Wisconsin – this job may not have been effectively done.

In Wisconsin, for example, officials refused to allow poll watchers to challenge the qualifications of people applying to vote or require proof of such persons' qualifications.<sup>80</sup> In Georgia, more than 2,000 individuals appear to have voted who were not listed in the State's records as having been registered to vote.<sup>81</sup>

In Pennsylvania, a poll watcher observed poll workers taking individuals whose names did not appear in voter registration books back into a separate area that was unobserved by any poll watchers. There, these apparently unregistered voters met with a Judge of Elections who allegedly told them: "you go back in, tell them this is your name, and you can vote."<sup>82</sup>

## Illegal Campaigning at Poll Locations

Poll workers are supposed to remain politically neutral. When a poll worker displays bias for one political candidate over another at a polling location, this is contrary to state law. Unfortunately, this law appears to have been repeatedly violated in Michigan, Pennsylvania, and Wisconsin.

For example, in Pennsylvania, poll workers were wearing paraphernalia from a group called "Voter Protection." This is a 100% Democrat-funded Political Action Committee dedicated to Democrat redistricting in Pennsylvania; and the wearing of its paraphernalia constitutes illegal campaigning at the polls.<sup>83</sup>

In a similar type of illegal campaigning in Michigan, poll workers were allowed to wear Black Lives Matter shirts and were seen carrying tote bags of President Obama paraphernalia.<sup>84</sup> In addition, poll workers with Biden and Obama campaign shirts on were allowed on the ballot counting floor.<sup>85</sup>

In Wisconsin, representatives from the Biden campaign were outside with clipboards talking to voters on their way in to vote. They were clearly inside the prohibited perimeter for electioneering. Poll workers did nothing to address this illegal campaigning despite the objections of observers.<sup>86</sup>

## Ballots Cured by Poll Workers or Voters Contrary to Law

Under prescribed circumstances, both poll workers and voters may fix ballots with mistakes or discrepancies. This process is known as "ballot curing."

In nineteen states, poll workers must notify voters if there are errors or discrepancies on their ballots and allow them to "cure" or correct any errors so their votes will count.<sup>87</sup> However, in states that do not allow curing, ballots with discrepancies such as missing or mismatched signatures must be discarded.<sup>88</sup>

In Pennsylvania, and contrary to state law, poll workers were trained to allow voters to cure or “correct” their ballots.<sup>89</sup> According to one court filing, Democrat-controlled counties in Pennsylvania participated in pre-canvass activities prior to Election Day “by reviewing received mail-in ballots for deficiencies.”<sup>90</sup> Such discrepancies included “lacking the inner secrecy envelope or lacking a signature of the elector on the outer declaration envelope.” Voters were then notified so that they could cure their ballots – a clear violation of state law.<sup>91</sup>

Numerous other examples of illegally cured ballots abound. For example, in Wisconsin, tens of thousands of ballots were observed to be corrected or cured despite election observer objections.<sup>92</sup>

In Pennsylvania, poll workers sorted approximately 4,500 ballots with various errors into bins. Poll workers then re-filled out the 4,500 ballots so that they could be read by tabulation machines, an action contrary to state law.<sup>93</sup>

In Michigan, poll workers altered the dates on the outer envelopes of the ballots so that they would be able to count them.<sup>94</sup> Michigan poll workers also filled out blank ballots to “correct” mail-in and absentee ballots according to what they believed the “voter had intended.”<sup>95</sup>

## VI. Equal Protection Clause Violations

The Equal Protection Clause is part of the 14<sup>th</sup> Amendment of the U.S. Constitution and a fundamental pillar of the American Republic. This Equal Protection Clause mandates that no State may deny its citizens equal protection of its governing laws.<sup>96</sup>

Table 6 illustrates three major alleged violations of the Equal Protection Clause in the 2020 presidential election. As the table illustrates, each violation was observed to occur across all six battleground states.

**Table 6: Equal Protection Clause Violations in the Six Battleground States**

|                                                                                   | ARIZONA | GEORGIA | MICHIGAN | NEVADA | PENNSYLVANIA | WISCONSIN |
|-----------------------------------------------------------------------------------|---------|---------|----------|--------|--------------|-----------|
| Higher Standards of Certification & I.D. Verification Applied to In-Person Voters | ✓       | ✓       | ✓        | ✓      | ✓            | ✓         |
| Different Standards of Ballot Curing                                              | ✓       | ✓       | ✓        | ✓      | ✓            | ✓         |
| Differential & Partisan Poll Watcher Treatment                                    | ✓       | ✓       | ✓        | ✓      | ✓            | ✓         |

✓ = Wide-Spread Evidence   \* = Some Evidence

## Higher Standards of Certification & I.D. Verification Applied to In-Person Voters

The first alleged violation focuses on the application of higher standards of certification and voter identification for in-person voters than mail-in and absentee ballot voters. In effect, these higher standards disproportionately benefited the candidacy of Joe Biden because President Trump had a much higher percentage of in-person voters than mail-in and absentee voters. Indeed, mail-in and absentee ballots were largely skewed for Joe Biden across the country by ratios as high as 3 out of 4 votes in some states.<sup>97</sup>

Note here that much of the alleged fraud and ballot mishandling focused on mail-in voters and absentee ballots. Therefore, the lower the level of scrutiny of these voters, the more illegal votes for Joe Biden relative to Donald Trump could slip in. It should likewise be noted here that this particular violation of the Equal Protection Clause was further enabled by poll watchers being denied meaningful observation.

Perhaps the most egregious examples of this particular violation of the Equal Protection clause occurred in Georgia and Michigan. Georgia, for example, requires ID for voting in-person and Michigan will only allow provisional voting without an ID. However, in both Georgia and Michigan, a valid ID is not required to vote by mail so long as the person has already registered in a previous election.

These procedures are ripe for fraud. In fact, there is evidence that election fraudsters targeted voters who had voted in past elections but not voted in more recent ones. These fraudsters could then cast ballots on behalf of these infrequent voters with little likelihood they would be caught. Numerous affidavits, however, detail persons arriving to vote at polls only to be informed that records indicate they had already voted. At least fourteen such affidavits have been made by Georgians.

As a further example, in Wisconsin, mail-in ballots were accepted without witness signatures placed properly in the allocated envelope location.<sup>98</sup> A comparable process for in-person voting would have resulted in the invalidation of the vote.

## Different Standards of Ballot Curing

As a second major violation of the Equal Protection Clause, likewise observed across all six battleground states, different standards for correcting mistakes on ballots (ballot curing) were applied across different jurisdictions within the states. Often, jurisdictions with predominantly Democrat registration were more expansive about allowing the curing of ballots than jurisdictions with predominantly Republican registration.

In Pennsylvania, there was a clear difference between how ballots were – or were not – cured in Republican counties versus Democrat counties. When Pennsylvania’s Secretary of State Kathy Boockvar issued illegal guidance authorizing counties to cure ballots, this illegal guidance was not followed in at least eight different Republican counties.<sup>99</sup> Meanwhile, ballots were cured in Democrat counties under this illegal guidance.<sup>100</sup>

In Arizona, there likewise was a clear difference between how in-person voters were treated versus mail-in ballots. On the one hand, mail-in voters had up to 5 days to “cure” or “fix” invalid mail-in ballots sent prior to Election Day.<sup>101</sup> On the other hand, in-person voters in Maricopa County, for example, had to deal with poll workers who did not know how to work electronic voting machines properly. This resulted in thousands of in-person votes being marked incorrectly and disregarded rather than cured.<sup>102</sup>

### Differential and Partisan Poll Watcher Treatment

In most states, political party candidates and ballot issue committees are able to appoint poll watchers and observers to oversee the ballot counting process.<sup>103</sup> Such poll watchers and observers must be registered voters and present certification to the Judge of Elections in order to be able to fulfill their duties at a polling location.<sup>104</sup>

Such certified poll watchers should be free to observe at appropriate distances regardless of their party affiliation. Yet in key Democrat strongholds, e.g., Dane County in Wisconsin and Wayne County in Michigan, which yielded high Biden vote counts, Republican poll watchers and observers were frequently subject to different treatment ranging from denial of entry to polling places to harassment and intimidation.

For example, in Georgia, a certified poll watcher witnessed other poll workers at a polling location discussing how they should not speak to her due to her party affiliation.<sup>105</sup> In Pennsylvania, a Republican poll watcher was harassed and removed from the polling location due to his party affiliation.<sup>106</sup> In Wisconsin, a Republican poll watcher was prevented from observing due to the fact that polling locations were not allowing Republicans in.<sup>107</sup>

Note the synergy here between the problem of the process foul involved with denying access to certified poll watchers (discussed in the previous section) and the violation of the Equal Protection Clause such conduct entails when such denial, harassment, and intimidation differs by party affiliation.

## VII. 2020 Election Voting Machine Irregularities

Perhaps no device illustrates that technology is a double-edged sword than the machines and associated software that have come to be used to tabulate votes across all 50 states.<sup>108</sup> Types of voting equipment include optical scanners used to process paper ballots, direct recording electronic systems which voters can use to directly input their choices, and various marking devices to produce human-readable ballots.<sup>109</sup>

Two main types of voting machine irregularities have been alleged in the 2020 presidential election. As Table 7 illustrates, these types of irregularities include large-scale voting machine inaccuracies together with inexplicable vote switching and vote surges, often in favor Joe Biden.

**Table 7: 2020 Voting Machine Irregularities**

|                                                               | ARIZONA | GEORGIA | MICHIGAN | NEVADA | PENNSYLVANIA | WISCONSIN |
|---------------------------------------------------------------|---------|---------|----------|--------|--------------|-----------|
| Large-Scale Voting Machine Inaccuracies                       | ✓       |         | ✓        | ✓      |              |           |
| Inexplicable Vote Switching and Vote Surges In Favor of Biden | ✓       | ✓       | ✓        |        |              |           |

✓ = Wide-Spread Evidence   \* = Some Evidence

### Large-Scale Voting Machine Inaccuracies

Much has been made about the shadowy genesis of a company called Dominion which provides voting machines and equipment to 28 states.<sup>110</sup> According to critics, Dominion's roots may be traced to an effort by the Venezuelan dictator Hugo Chavez to rig his sham elections.<sup>111</sup> Dominion is also alleged to have ties to the Clinton Foundation,<sup>112</sup> while the Smartmatic software used in the Dominion machines is alleged to have links to the shadowy anti-Trump globalist financier George Soros.<sup>113</sup>

The controversy swirling over Dominion and Smartmatic notwithstanding, one of the biggest problems with machine inaccuracies may be traced to a company called Agilis. Nevada election officials in Clark County, a Democrat stronghold in Nevada, used Agilis signature verification machines to check over 130,000 mail-in ballot signatures.

According to a court case filed in the First Judicial District Court in Carson City, the Agilis machines used a "lower image quality than suggested by the manufacturer." Clark County Election Department officials also lowered the accuracy rate below the manufacturer's recommendations, making the whole verification process unreliable.<sup>114</sup>

In a test run, it was proven that, at the manufacturer's setting, the Agilis machine already had a high tolerance for inaccuracies—as high as 50% non-matching. In other words, half of the ballots that might be moved through the machine would be impossible to verify; and Clark County officials lowered that threshold even further.<sup>115</sup>

As a final comment on this case, there is also the broader legal matter that the Agilis machines were used to “entirely replace signature verification by election personnel.” This is contrary to Nevada state law.

As noted in a court case: “In violation of Nevada law, the Clark County Election Department allows the Agilis machine to solely verify 30% of the signatures accompanying the mail-in ballots without ever having humans inspect those signatures.”<sup>116</sup>

A similar problem has been alleged in a court filing in Arizona with a software known as the Novus 6.0.0.0. In cases where ballots were too damaged or illegible to be read by vote tabulation machines, Novus was used in an attempt to cure or restore the ballots. The system would do so by trying to read the applicable scans of the original rejected ballots. However, as noted in a court case filed by Kelli Ward, Chairwoman of the Arizona Republican Party: “the software was highly inaccurate, and it often flipped the vote.”<sup>117</sup>

### **Inexplicable Vote Switching and Vote Surges In Favor of Biden**

As a further complication to the Novus software problem in Arizona referenced above, the software was not only highly inaccurate. According to observers, and as an example of inexplicable vote switching, “the software would erroneously prefill ‘Biden’ twice as often as it did ‘Trump.’”<sup>118</sup>

At least one instance of a large and inexplicable vote switching and vote surge in favor of Joe Biden took place in Antrim County, Michigan – and it is associated with the controversial aforementioned Dominion-Smartmatic voting machine hardware-software combo.<sup>119</sup> In this Republican stronghold, 6,000 votes were initially, and incorrectly, counted for Joe Biden. The resulting vote totals were contrary to voter registration and historical patterns and therefore raised eyebrows. When a check was done, it was discovered that the 6,000 votes were actually for Donald J. Trump.

A subsequent forensic audit of the Antrim County vote tabulation found that the Dominion system had an astonishing error rate of 68 percent.<sup>120</sup> By way of comparison, the Federal Election Committee requires that election systems must have an error rate no larger than 0.0008 percent.<sup>121</sup>

Perhaps even more troubling given concerns over hackers and Dominion's alleged ties to bad foreign actors, the records that would have allowed the detection of remote internet access went missing from the Antrim County system. This was in direct violation of Michigan state law,<sup>122</sup> which requires retention of voting records for 22 months -- such information was in place for previous election years, but not this election. At the very least, the results of this audit indicates the need for further investigation of the Dominion system across other states in the country.

In Georgia, there were numerous "glitches" with the Dominion machines where the results would change. The most notable of these changes was a 20,000 vote surge for Biden and 1,000 vote decrease for Trump.<sup>123</sup>

## VIII. Statistical Anomalies in the Six Battleground States

The 2020 presidential election appears to feature at least four types of statistical anomalies that raise troubling questions. Table 8 illustrates the incidence of these statistical anomalies across the six battleground states. As you can see from the table, Wisconsin and Georgia are characterized by the highest degree of statistical anomalies, with three of the four anomalies present. Nevada and Arizona show two anomalies present while Michigan has at least one. Let's take a more granular look now at each of these types of statistical anomalies.

**Table 8: Statistical Anomalies in the Battleground States**

|                                                                                        | ARIZONA | GEORGIA | MICHIGAN | NEVADA | PENNSYLVANIA | WISCONSIN |
|----------------------------------------------------------------------------------------|---------|---------|----------|--------|--------------|-----------|
| Significant Changes In Absentee Ballot Rejection Rates From Previous Elections         |         | ✓       |          | ✓      | ✓            |           |
| Excessively High Voter Turnout (at times exceeding 100%)                               | ✓       | ✓       | ✓        | ✓      |              | ✓         |
| Statistically Improbable Vote Totals Based on Party Registration & Historical Patterns | ✓       |         |          |        |              | ✓         |
| Unusual Vote Surges                                                                    |         | ✓       | *        |        |              | ✓         |

✓ = Wide-Spread Evidence   \* = Some Evidence

### Dramatic Changes in Mail-in and Absentee Ballot Rejection Rates from Previous Elections

It is routine across the 50 states for mail-in-and absentee ballots to be rejected for any number of reasons. These reasons may include: the lack of a signature or adequate signature match, a late arrival past a deadline,<sup>124</sup> the lack of an external envelope that verifies voter-identification (a naked ballot),<sup>125</sup> or if voters provide inaccurate or incomplete information on the ballots.<sup>126</sup>

In the 2020 presidential race, Joe Biden received a disproportionately high percentage of the mail-in and absentee ballots. Perhaps not coincidentally, we saw a dramatic fall in rejection rates in Pennsylvania, Nevada, and especially Georgia.

For example, in Nevada, the overall rejection rate dropped from 1.6%<sup>127</sup> in 2016 to 0.58% in 2020.<sup>128</sup> In Pennsylvania, the 2016 rejection rate of 1.0%<sup>129</sup> dropped to virtually nothing at 0.28%.<sup>130</sup> The biggest fall in the overall absentee ballot rejection rate came, however, in Georgia. Its rejection rate fell from 6.8%<sup>131</sup> in 2016 to a mere 0.34%<sup>132</sup> in 2020.

These dramatically lower rejection rates point to a conscious effort by Democrat election officials across these key battleground states to subject mail-in and absentee ballots to a lower level of scrutiny. That this kind of government conduct and gaming of our election system may have contributed to tipping the scales in favor of Joe Biden can be illustrated in this simple calculation:

In the 2020 race, Georgia election officials received 1,320,154 mail-in and absentee ballots. If these ballots had been rejected at the 2016 rate of 6.8% instead of the 2020 rate of 0.34%, there would have been 81,321 ballots rejected instead of the 4,489 ballots that were actually rejected.

Under the conservative assumption that 60% of these mail-in and absentee ballots went to Joe Biden,<sup>133</sup> this dramatic fall in the rejection rate provided Joe Biden with an additional 16,264 votes. That's more than the margin of the alleged Biden victory in Georgia.

#### Excessively High Voter Turnout (at times exceeding 100%)

When there are more ballots cast than registered or eligible voters, fraud has likely taken place. During the 2020 presidential election, excessively high voter turnout occurred across all six swing states.

In analyzing this problem, it is important to distinguish between states that have same-day registration and those that don't. States with same-day registration can plausibly have voter turnout that is higher than 100%. However, is impossible for that to happen in states without same-day registration without fraud having taken place.

Consider, then, Arizona which does not allow same-day voter registration. According to testimony from an MIT-trained mathematician, Candidate Biden may have received a weighted 130% total of Democrat votes in Maricopa County to help him win the state due to an algorithm programmed into the Dominion voting machines used there.<sup>134</sup>

Although Michigan does allow same-voter registration, voter turnout was still abnormally high. Here again, the Dominion voting system has been implicated. To wit:

Cybersecurity executive and former NASA analyst, Russ Ramsland, testified that in Wayne County, Michigan, where Dominion Voting Systems equipment was used, 46 out of 47 precincts in the county displayed greater than a 96% voter turnout. 25 out of those precincts showed a 100% voter turnout.<sup>135</sup>

Wisconsin, which also allows same-day voter registration, also reported abnormally high voter turnout when compared to 2016 numbers. For example, Milwaukee reported a record 84% voter turnout during the 2020 presidential election versus 75% in 2016.<sup>136</sup> Of the city's 327 voting wards, 90 reported a turnout of greater than 90%.<sup>137</sup>

### Statistically Improbable Vote Totals Based on Party Registration and Historical Patterns

The 2020 presidential election was characterized by strong partisan voting patterns consistent with historical patterns. As a rule, heavily Republican jurisdictions voted heavily for President Trump and heavily Democrat jurisdictions voted heavily for Joe Biden.

In some cases, however, there were instances where these partisan and historical patterns were violated. It is precisely in such instances where either outright fraud or machine inaccuracies or manipulations are most likely to be operative.

As one example of such statistically improbable vote totals, there are the results in Arizona's Fifth Congressional District. In one precinct in the suburb of Queen Creek, the vote percent for President Trump dropped dramatically relative to 2016, from 67.4 to 58.5 percent.<sup>138</sup> This was attributed to an "unusually high" number of duplicate ballots.<sup>139</sup>

### Unusual Vote Surges

Several unusual vote surges took place in the very early hours of the morning of November 4<sup>th</sup> in Georgia, Michigan, and Wisconsin. An analysis conducted by the Voter Integrity Project of *The New York Times* publicly reported data on Election Day that showed several vote "spikes" that were unusually large in size with unusually high Biden-to-Trump ratios. Such spikes or surges could well indicate that fraudulent ballots had been counted.

In Georgia, for example, an update at 1:34 AM on November 4<sup>th</sup> showed 136,155 additional ballots cast for Joe Biden, and 29,115 additional votes cast for President Trump.<sup>140</sup> An update in Michigan at 3:50 AM on November 4<sup>th</sup> showed an update of 54,497 additional votes cast for Joe Biden, and 4,718 votes cast for President Trump.<sup>141</sup> And an update in Wisconsin at 3:42 AM on November 4<sup>th</sup> showed 143,379 additional ballots cast for Joe Biden, and 25,163 votes cast for President Trump.<sup>142</sup>

## IX. A State-By-State Analysis and Signal Failure of Our Legislative and Judicial Branches

*All happy families are alike; each unhappy family is unhappy in its own way.*

– ***Anna Karenina, by Leo Tolstoy***

It should be clear at this point that all six battleground states suffer from most or all of the six dimensions of election irregularities documented in this report. However, like Tolstoy's unhappy families, it is also true that each battleground state is different in its own election irregularity way. That is, each battleground state may be characterized by a unique mix of issues that, impressionistically, might be considered "most important" in swinging that state for Joe Biden.

Consider Arizona, a state with the lowest alleged Biden victory margin at 10,457 votes. This is a state with statistically improbable high voter turnouts in Maricopa and Pima counties; widespread ballot mishandling; and 1.6 million mail-in ballots (which tended towards Biden) subjected to much lower standards of certification and ID verification than in-person voters (who tended towards Trump).

In Georgia, the alleged Biden victory margin was just 11,779 votes. What perhaps jumps out most in the Peach State is the illegal Consent Decree that effectively gutted the signature match requirements for millions of mail-in ballots. There is also the quite unresolved fake ballot manufacturing matter of the roughly 100,000 ballots that were mysteriously pulled, in the dead of night, out from underneath tables and expeditiously tabulated. Of course, we saw that Georgia's electoral version of a Three-card Monte sleight-of-hand led to a strong Biden vote surge.

Of all of the six battleground states which suffered from numerous observer and poll watcher abuses, Michigan must rank as "first among equals." With its "board up the windows" and "rough up the observers" tactics, Detroit in Wayne County was the center of this "see no evil" universe. When two local Republican officials tried to withhold certification of the votes in this county for practices such as these and demanded an audit, they were subject to extreme intimidation and "doxing" and quickly capitulated.<sup>143</sup>

As for Nevada, this is a state likewise with a very narrow alleged victory margin for Joe Biden – 33,596 votes. Here, voting machine irregularities associated with the Agilis machine have called into question as many as 130,000 votes. There may also be an unusually large number of ballots cast by out-of-state voters and others who did not meet residency requirements. Of course, the brazen bribery of Native Americans to vote for Joe Biden is a dark stain on the state and the Democrat Party.<sup>144</sup>

In Pennsylvania, an equally brazen Democrat Secretary of State issued illegal guidance for the acceptance of naked ballots and ignored direction from the Pennsylvania Supreme Court to fix the matter. She allowed ballots to be illegally cured in contravention of state law and pushed the legal envelope for accepting ballots after Election Day.

In the Keystone State, and as with Georgia's Three-card Monte, shuffle fake ballots out from underneath a table scandal, there is also the equally unresolved matter of possible fake ballot manufacturing. Recall, here, the testimony of a truck driver who swears he picked up as many as 100,000 fake manufactured ballots in New York and delivered them to Pennsylvania. Both the tractor-trailer and the ballots involved remain unaccounted for – and what might have been in this tractor-trailer were enough ballots alone to swing the election to Joe Biden.

Finally, in Wisconsin, the mother of all contestable process fouls is arguably that of the roughly 170,000 mail-in ballots entering the tabulation process under the guise of absentee ballots in clear violation of state law. That's more than eight times the number of ballots of the alleged Biden victory margin of 20,682 votes.

In Wisconsin, there is likewise the large-scale abuse associated with an overly expansive definition of "indefinitely confined voters." Recall here that the increment of new indefinitely confined voters in the 2020 election in Wisconsin was more than five times the alleged Biden victory margin.

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While Democrat Party government officials cheated and gamed the electoral process across all six battleground states, many Republican government officials – from governors and state legislators to judges – did little or nothing to stand in their way.

Consider that the Republican Party controls *both* chambers of the State Legislatures in five of the six battleground states – Arizona, Georgia, Michigan, Pennsylvania, and Wisconsin.<sup>145</sup> These State Legislatures clearly have both the power and the opportunity to investigate the six dimensions of election irregularities presented in this report. Yet, wilting under intense political pressure, these politicians have failed in their Constitutional duties and responsibilities to do so – and thereby failed both their states and this nation as well as their party.

The same can be said for the Republican governors in two of the six battleground states – Arizona and Georgia. Both Arizona's Doug Ducey and Georgia's Brian Kemp have cowered in their Governor's mansions and effectively sat on their hands while their states have wallowed in election irregularities.

The judicial branch of the American government should be the final backstop for the kind of issues examined in this report. Yet both our State courts and Federal courts, including the Supreme Court, have failed the American people in refusing to properly adjudicate the election irregularities that have come before them. Their failures likewise pose a great risk to the American Republic.

## Concluding Observations

From the findings of this report, it is possible to infer what may well have been a coordinated strategy to effectively stack the election deck against the Trump-Pence ticket. Indeed, the patterns of election irregularities observed in this report are so consistent across the six battleground states that they suggest a coordinated strategy to, if not steal the election, then to strategically game the election process in such a way as to unfairly tilt the playing field in favor of the Biden-Harris ticket.

A major part of this “stuff the ballot box” strategy has been aptly summarized in a complaint filed before the US Supreme Court by the State of Texas:

*Using the COVID-19 pandemic as a justification, [Democrat] government officials [in Georgia, Michigan, Pennsylvania, and Wisconsin] usurped their legislatures’ authority and unconstitutionally revised their state’s election statutes. They accomplished these statutory revisions through executive fiat or friendly lawsuits, thereby weakening ballot integrity.<sup>146</sup>*

According to the Texas complaint – which the Supreme Court sadly refused to hear – the goal of this strategy was to flood the battleground states “with millions of ballots to be sent through the mails, or placed in drop boxes, with little or no chain of custody.” At the same time, Democrat government officials also sought to “weaken the strongest security measures protecting the integrity of the vote signature verification and witness requirements.”<sup>147</sup>

The findings of the assessment conducted in this report are consistent with the Texas complaint. Key takeaways include:

- The weight of evidence and patterns of irregularities uncovered in this report are such that it is irresponsible for anyone – especially the mainstream media – to claim that there is “no evidence” of fraud or irregularities.
- The ballots that have come into question because of the identified election irregularities are more than sufficient to swing the outcome in favor of President Trump should even a relatively small portion of these ballots be ruled illegal.
- While all six battleground states exhibit most, or all, six dimensions of election irregularities, each state has a unique mix of issues that might be considered “most important.” To put this another way, all battleground states are characterized by the same or similar election irregularities; but, like Tolstoy’s unhappy families, each battleground state is different in its own election irregularity way.
- This was theft by a thousand cuts across six dimensions and six battleground states rather than any one single “silver bullet” election irregularity.

- In refusing to investigate a growing number of legitimate grievances, the anti-Trump media and censoring social media are complicit in shielding the American public from the truth. This is a dangerous game that simultaneously undermines the credibility of the media and the stability of our political system and Republic.
- Those journalists, pundits, and political leaders now participating in what has become a Biden Whitewash should acknowledge the six dimensions of election irregularities and conduct the appropriate investigations to determine the truth about the 2020 election. If this is not done before Inauguration Day, we risk putting into power an illegitimate and illegal president lacking the support of a large segment of the American people.
- The failure to aggressively and fully investigate the six dimensions of election irregularities assessed in this report is a signal failure not just of our anti-Trump mainstream media and censoring social media but also of both our legislative and judicial branches.
  - Republican governors in Arizona and Georgia together with Republican majorities in both chambers of the State Legislatures of five of the six battleground states – Arizona, Georgia, Michigan, Pennsylvania, and Wisconsin<sup>148</sup> – have had both the power and the opportunity to investigate the six dimensions of election irregularities presented in this report. Yet, wilting under intense political pressure, these politicians have failed in their Constitutional duties and responsibilities to do so – and thereby failed both their states and this nation as well as their party.
  - Both State courts and Federal courts, including the Supreme Court, have failed the American people in refusing to appropriately adjudicate the election irregularities that have come before them. Their failures pose a great risk to the American Republic.
- If these election irregularities are not fully investigated prior to Inauguration Day and thereby effectively allowed to stand, this nation runs the very real risk of never being able to have a fair presidential election again – with the down-ballot Senate races scheduled for January 5 in Georgia an initial test case of this looming risk.

## ENDNOTES

<sup>1</sup> All witnesses who have signed sworn affidavits or declarations who are referenced in this report but whose names are not referenced in the public record, e.g., a court case, are referred to as “Jane Doe” or “John Doe” based on gender. This has been done to ensure their safety and security.

<sup>2</sup> Ballotpedia, “Partisan composition of state legislatures,” December 4, 2020. [https://ballotpedia.org/Partisan\\_composition\\_of\\_state\\_legislatures](https://ballotpedia.org/Partisan_composition_of_state_legislatures)

<sup>3</sup> Bump, Philip. “The two states that almost always predict which candidate is headed for defeat,” *The Washington Post*, 7 September 2016. <https://www.washingtonpost.com/news/the-fix/wp/2016/09/07/the-two-states-that-almost-always-predict-which-candidate-is-headed-for-defeat/>

\*The two Democrat candidate exceptions were John F. Kennedy in 1960 and Bill Clinton in 1992.

<sup>4</sup> Williams, Pete. “Trump’s election fight includes over 50 lawsuits. It’s not going well.” *NBC News*, November 23, 2020. <https://www.nbcnews.com/politics/2020-election/trump-s-election-fight-includes-over-30-lawsuits-it-s-n1248289>

<sup>5</sup> All witnesses who have signed sworn affidavits and declarations referenced in this report are referred to as “Jane Doe” and “John Doe” based on gender, in order to ensure their safety and security.

<sup>6</sup> Bannon, Steve, *War Room Pandemic*, <https://pandemic.warroom.org/>

<sup>7</sup> Solomon, John, *Just the News*, <https://justthenews.com/john-solomon>

<sup>8</sup> Kassam, Raheem, *National Pulse*, <https://americasvoice.news/the-national-pulse/>

<sup>9</sup> Newsmax, <https://www.newsmax.com/>

<sup>10</sup> One America News Network, <https://www.oann.com/>

<sup>11</sup> “Most Say Mail-In Voting Worked, But 47% Say Fraud Likely.” *Rasmussen Reports*, December 7, 2020. [https://www.rasmussenreports.com/public\\_content/politics/elections/election\\_2020/most\\_say\\_mail\\_in\\_voting\\_work\\_ed\\_but\\_47\\_say\\_fraud\\_likely](https://www.rasmussenreports.com/public_content/politics/elections/election_2020/most_say_mail_in_voting_work_ed_but_47_say_fraud_likely)

<sup>12</sup> Legal Information Institute, “Bribery,” *Cornell University*, <https://www.law.cornell.edu/wex/bribery>

<sup>13</sup> Bedard, Paul, “Pro-Biden effort offered Native Americans \$25-\$500 Visa gift cards and jewelry to vote,” *Washington Examiner*, December 14, 2020. <https://www.washingtonexaminer.com/washington-secrets/pro-biden-effort-offered-native-americans-25-500-visa-gift-cards-jewelry-to-vote>

<sup>14</sup> Pentochoukov, Ivan, “Illegal Money-for-Votes Raffles Conducted in Several States in 2020 Election,” *Epoch Times*, December 2, 2020. [https://www.theepochtimes.com/illegal-money-for-votes-raffles-conducted-in-several-states-in-2020-election\\_3598915.html](https://www.theepochtimes.com/illegal-money-for-votes-raffles-conducted-in-several-states-in-2020-election_3598915.html)

<sup>15</sup> Morgan, Jessy. Testimony. “A truck driver with USPS says he was suspicious of his cargo load of 288,000 completed ballots.” December 1, 2020. <https://www.youtube.com/watch?v=R0xA4dYsbQ>

<sup>16</sup> Declaration of John Doe, Delaware County Pennsylvania, November 9, 2020.

<sup>17</sup> Bedard, Paul, “20 House Republicans demand Barr investigate ‘suitcases’ of ballots in Georgia,” *The Washington Examiner*, December 4, 2020. <https://www.washingtonexaminer.com/washington-secrets/20-house-gop-demand-ag-barr-investigate-suitcases-of-ballots-in-georgia>

<sup>18</sup> “Trump Campaign lawyers present video ‘evidence’ of ballot fraud,” *Senate Judiciary Subcommittee*, December 4, 2020. <https://www.youtube.com/watch?v=LJ0xDWhWUxk>

*Real American Politics*, December 4, 2020. <https://twitter.com/RealAPolitics/status/1334754269052997635?s=20>

<sup>19</sup> See, for example: Weber, Peter, “Georgia’s top election investigator debunks a vote fraud conspiracy involving ‘suitcases’ of ballots, a urinal,” December 7, 2020. <https://news.yahoo.com/georgias-top-election-investigator-debunks-115236191.html>

<sup>20</sup> In the United States District Court for the District of Arizona, *Tyler Bowyer et al v.. Doug Ducey*, December 2, 2020. <https://www.democracydocket.com/wp-content/uploads/sites/45/2020/12/Bower-Complaint-AZ.pdf>

<sup>21</sup> Affidavit of Jane Doe, Cobb County, Georgia, November 12, 2020.

<sup>22</sup> Declaration of Jane Doe, Bucks County, Pennsylvania, Nov 7, 2020

<sup>23</sup> WisGOP, “WisGOP: Trump lawsuit highlights indefinitely confined voter increase,” <https://www.wispolitics.com/2020/wisgop-trump-lawsuit-highlights-indefinitely-confined-voter-increase/>

<sup>24</sup> WisGOP, “WisGOP: Some indefinitely confined voters are not indefinitely confined,” <https://www.wispolitics.com/2020/wisgop-some-indefinitely-confined-voters-are-not-indefinitely-confined/>

<sup>25</sup> WisGOP, “WisGOP: Some indefinitely confined voters are not indefinitely confined,” <https://www.wispolitics.com/2020/wisgop-some-indefinitely-confined-voters-are-not-indefinitely-confined/>

- <sup>26</sup> WisGOP, “WisGOP: Trump lawsuit highlights indefinitely confined voter increase,” <https://www.wispolitics.com/2020/wisgop-trump-lawsuit-highlights-indefinitely-confined-voter-increase/>
- <sup>27</sup> Legal Information Institute, “18 U.S. Code § 611.Voting by aliens,” <https://www.law.cornell.edu/uscode/text/18/611>
- <sup>28</sup> The Superior Court Of Fulton County State Of Georgia, *Trump v. Raffensperger*, December 4, 2020. <https://www.democracymocket.com/wp-content/uploads/sites/45/2020/12/Trump-v.-Raffensperger.pdf>
- <sup>29</sup> In the Superior Court of Fulton County State of Georgia, November 30, 2020. <https://www.democracymocket.com/wp-content/uploads/sites/45/2020/11/2020-11-30-Verified-Complaint.pdf>
- <sup>30</sup> Declaration of Jane Doe, Philadelphia County, Pennsylvania, November 8, 2020.
- <sup>31</sup> In the First Judicial District Court Carson City, Nevada *Jesse Law v. Judith Whitmer*, November 17, 2020. <https://www.democracymocket.com/wp-content/uploads/sites/45/2020/11/nov-17-doc-2.pdf>
- <sup>32</sup> Declaration of John Doe, Las Vegas, Nevada, November 22, 2020.
- <sup>33</sup> “Rudy Giuliani claims 8,000 dead people voted in election in Pennsylvania,” November 25, 2020. [https://www.youtube.com/watch?v=2\\_VUkBJAcg](https://www.youtube.com/watch?v=2_VUkBJAcg)
- See Also
- “Pennsylvania Senate Republican Lawmaker Hearing Transcript on 2020 Election,” Rev, November 26, 2020. <https://www.rev.com/blog/transcripts/pennsylvania-senate-republican-lawmaker-hearing-transcript-on-2020-election>
- <sup>34</sup> Affidavit of Jane Doe, Oakland County, Michigan, November 11, 2020.
- <sup>35</sup> Declaration of John Doe, Clark County, Nevada, November 7, 2020.
- <sup>36</sup> In the Superior Court of Fulton County State of Georgia, *Paul Andrew Boland v Brad Raffensperger*, November 29, 2020. <https://www.democracymocket.com/wp-content/uploads/sites/45/2020/11/2020-11-30-Verified-Complaint.pdf>
- <sup>37</sup> Statement of John Doe, Las Vegas, Nevada, November 20, 2020.
- <sup>38</sup> Declaration of Jane Doe, Wisconsin, November 12, 2020.
- <sup>39</sup> Affidavit of Jane Doe, Washtenaw County, Michigan, November 9, 2020.
- <sup>40</sup> Declaration of Jane Doe, Northampton County, November 8, 2020.
- <sup>41</sup> Declaration of John Doe, Philadelphia County, November 14, 2020.
- <sup>42</sup> Declaration of Jane Doe, Northampton County, Pennsylvania, November 7, 2020.
- <sup>43</sup> Affidavit of John Doe, Michigan, November 10, 2020.
- <sup>44</sup> Declaration of Jane Doe, Clark County, November 8, 2020.
- <sup>45</sup> *Ballotpedia*, “How do election workers match signatures? (2020),” [https://ballotpedia.org/How do election workers match signatures%3F\\_\(2020\)](https://ballotpedia.org/How_do_election_workers_match_signatures%3F_(2020))
- <sup>46</sup> Democratic Party of Georgia, Inc. (“DPG”), the DSCC, and the DCCC, Compromise Settlement and Release, March 6, 2020. <https://www.democracymocket.com/wp-content/uploads/sites/45/2020/07/GA-Settlement-1.pdf>
- <sup>47</sup> Petition for Writ of Madamus and Complaint for Declaratory and Injunctive Relief, “*Daniel Rodimer v. Joseph Gloria*, November 19, 2020. [https://www.democracymocket.com/wp-content/uploads/sites/45/2020/11/Rodimer-v-Gloria\\_A-20-825130-W\\_Writ-of-Madamus.pdf](https://www.democracymocket.com/wp-content/uploads/sites/45/2020/11/Rodimer-v-Gloria_A-20-825130-W_Writ-of-Madamus.pdf)
- <sup>48</sup> In the First Judicial District Court Carson City, Nevada *Jesse Law v. Judith Whitmer*, November 17, 2020. <https://www.democracymocket.com/wp-content/uploads/sites/45/2020/11/nov-17-doc-2.pdf>
- <sup>49</sup> In the United States District Court Eastern District of Wisconsin Milwaukee Division, *Donald J. Trump v. the Wisconsin Elections Commission*, December 2, 2020. <https://www.democracymocket.com/wp-content/uploads/sites/45/2020/12/Trump-v-WEC-EDWI.pdf>
- <sup>50</sup> *Ballotpedia*, “Pennsylvania Secretary of State,” [https://ballotpedia.org/Pennsylvania\\_Secretary\\_of\\_State](https://ballotpedia.org/Pennsylvania_Secretary_of_State)
- <sup>51</sup> The United States District Court for the Middle District of Pennsylvania, *Donald J. Trump for President et al v. Kathy Boockvar et al*, November, 18 2020. <https://www.courtlistener.com/recap/gov.uscourts.pamd.127057/gov.uscourts.pamd.127057.169.0.pdf>
- <sup>52</sup> The United States District Court for the Middle District of Pennsylvania, *Donald J. Trump for President et al v. Kathy Boockvar et al*, November, 18 2020. <https://www.courtlistener.com/recap/gov.uscourts.pamd.127057/gov.uscourts.pamd.127057.169.0.pdf>
- <sup>53</sup> The Elections Assistance Commission, “Ballot Building,” [https://www.eac.gov/sites/default/files/eac\\_assets/1/6/Chapter\\_5\\_Ballot\\_Building.pdf](https://www.eac.gov/sites/default/files/eac_assets/1/6/Chapter_5_Ballot_Building.pdf)
- <sup>54</sup> Harris, Bev, “About Chain of Custody,” *Election Watch*, February 16, 2016. <https://blackboxvoting.org/about-chain-of-custody/>
- <sup>55</sup> Declaration of Jane Doe, Pennsylvania, November 7, 2020. Northampton County.
- <sup>56</sup> Declaration of John Doe, Delaware County, Pennsylvania, November 7, 2020. (3 Pictures, 2 Videos)

- 
- <sup>57</sup> In the Supreme Court of the United States, *The State of Texas v. Commonwealth of Pennsylvania, State of Georgia, State of Michigan, State of Wisconsin*, December 7, 2020. <https://www.texasattorneygeneral.gov/sites/default/files/images/admin/2020/Press/SCOTUSFiling.pdf>
- <sup>58</sup> Chaitin, Daniel, "Lindsey Graham: Possible ballot harvesting in Pennsylvania involving 25,000 nursing home residents," *Microsoft News*, November 10, 2020. <https://www.msn.com/en-us/news/politics/lindsey-graham-possible-ballot-harvesting-in-pennsylvania-involving-25-000-nursing-home-residents/ar-BB1aR3R4>
- <sup>59</sup> Affidavit of Jane Doe, Brookfield, Wisconsin, November 10, 2020.
- <sup>60</sup> Declaration of John Doe, Brown County, November 11, 2020.
- <sup>61</sup> Greenberg, Jay, "Dominion Technician Exposed as Anti-Trump Ex-Kamala Harris Worker," December 1, 2020. <https://neonnettle.com/news/13425-dominion-technician-exposed-as-anti-trump-ex-kamala-harris-worker>
- <sup>62</sup> Declaration of Jane Doe, Waukesha County, Wisconsin, November 11, 2020.
- <sup>63</sup> " 'USPS contractor: "Something profoundly wrong occurred in Wisconsin during the presidential election' " December 1, 2020. <https://www.youtube.com/watch?v=hRUvP6cbtZk&feature=youtu.be&t=69>
- See also
- Van Brugen, Isabel, "Wisconsin USPS Subcontractor Alleges Backdating of Tens of Thousands of Mail-In Ballots," December 2, 2020. [https://www.theepochtimes.com/wisconsin-usps-subcontractor-alleges-backdating-of-tens-of-thousands-of-mail-in-ballots\\_3601580.html](https://www.theepochtimes.com/wisconsin-usps-subcontractor-alleges-backdating-of-tens-of-thousands-of-mail-in-ballots_3601580.html)
- <sup>64</sup> State of Michigan Judicial District, *Cheryl A. Constantino and David A. Kallman v. City of Detroit*, November 8, 2020. <https://assets.documentcloud.org/documents/20403147/wayne-county-michigan-election-fraud-lawsuit.pdf>
- <sup>65</sup> Affidavit of Jane Doe, Oakland County, Michigan November 10, 2020.
- <sup>66</sup> Declaration of John Doe, Cobb County, Georgia, November 5, 2020.
- <sup>67</sup> Affidavit John Doe, Eagle County, Colorado November 12, 2020.
- <sup>68</sup> The Declaration of John McBlain, Esquire. See, The Supreme Court of the United States, *State of Texas v. Commonwealth of Pennsylvania, State of Georgia, State of Michigan, and State of Wisconsin*, December 7, 2020. [https://www.supremecourt.gov/DocketPDF/22/22O155/163048/20201208132827887\\_TX-v-State-ExpedMot%202020-12-07%20FINAL.pdf](https://www.supremecourt.gov/DocketPDF/22/22O155/163048/20201208132827887_TX-v-State-ExpedMot%202020-12-07%20FINAL.pdf)
- <sup>69</sup> Affidavit of Jane Doe, Gwinnett County, Georgia, November 12, 2020.
- <sup>70</sup> Affidavit John Doe, Waukesha County, Wisconsin, November 10, 2020.
- <sup>71</sup> Affidavit of Jane Doe, Clark County, Nevada, November 10, 2020.
- <sup>72</sup> The Declaration of John McBlain, Esquire. See, The Supreme Court of the United States, *State of Texas v. Commonwealth of Pennsylvania, State of Georgia, State of Michigan, and State of Wisconsin*, December 7, 2020. [https://www.supremecourt.gov/DocketPDF/22/22O155/163048/20201208132827887\\_TX-v-State-ExpedMot%202020-12-07%20FINAL.pdf](https://www.supremecourt.gov/DocketPDF/22/22O155/163048/20201208132827887_TX-v-State-ExpedMot%202020-12-07%20FINAL.pdf)
- <sup>73</sup> Affidavit of John Doe, November 10, 2020, Waukesha County, Wisconsin.
- <sup>74</sup> The Declaration of John McBlain, Esquire. See, The Supreme Court of the United States, *State of Texas v. Commonwealth of Pennsylvania, State of Georgia, State of Michigan, and State of Wisconsin*, December 7, 2020. [https://www.supremecourt.gov/DocketPDF/22/22O155/163048/20201208132827887\\_TX-v-State-ExpedMot%202020-12-07%20FINAL.pdf](https://www.supremecourt.gov/DocketPDF/22/22O155/163048/20201208132827887_TX-v-State-ExpedMot%202020-12-07%20FINAL.pdf)
- <sup>75</sup> The Superior Court Of Fulton County State Of Georgia, *Trump v. Raffensperger*, December 4, 2020. <https://www.democracymocket.com/wp-content/uploads/sites/45/2020/12/Trump-v.-Raffensperger.pdf>
- <sup>76</sup> Liptak, Adam, "Supreme Court Allows Longer Deadline for Absentee Ballots in Pennsylvania and North Carolina," *New York Times*, October 28, 2020. <https://www.nytimes.com/2020/10/28/us/supreme-court-pennsylvania-north-carolina-absentee-ballots.html>
- <sup>77</sup> Southwick, Ron, "Pa. received 10,000 ballots after polls closed on Election Day," *PennLive*, Nov10, 2020. <https://www.pennlive.com/elections/2020/11/pa-received-10000-late-ballots-that-arrived-after-polls-closed-on-election-day.html>
- <sup>78</sup> Declaration of Jane Doe, Delaware County, Pennsylvania, November 7, 2020.
- <sup>79</sup> The Supreme Court of Wisconsin, "Donald J. Trump et al v. Anthony Evers et al" December 1, 2020. [https://cdn.donaldjtrump.com/public-files/press\\_assets/wisconsin-filing-12-1-20\\_compressed.pdf](https://cdn.donaldjtrump.com/public-files/press_assets/wisconsin-filing-12-1-20_compressed.pdf)
- <sup>80</sup> Declaration of Jane Doe, Oak Creek, Wisconsin, November 11, 2020.
- <sup>81</sup> The Superior Court Of Fulton County State Of Georgia, *Trump v. Raffensperger*, December 4, 2020. <https://www.democracymocket.com/wp-content/uploads/sites/45/2020/12/Trump-v.-Raffensperger.pdf>
- <sup>82</sup> Declaration of John Doe, Montgomery County, Pennsylvania, November 7, 2020.
- <sup>83</sup> Declaration of John Doe, Allegheny County, Pennsylvania, November 9, 2020.
- <sup>84</sup> Declaration of John Doe, Ingham County, Michigan, November 11, 2020.
- <sup>85</sup> Declaration of Jane Doe, Ingham County, Michigan, November 11, 2020.

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- <sup>86</sup> Declaration of Jane Doe, Wheaton, Illinois, November 9, 2020.
- <sup>87</sup> “Cure period of absentee and mail-in ballots,” *Ballotpedia*, Accessed on December 14, 20. [https://ballotpedia.org/Cure\\_period\\_for\\_absentee\\_and\\_mail-in\\_ballots](https://ballotpedia.org/Cure_period_for_absentee_and_mail-in_ballots)
- <sup>88</sup> “Cure period of absentee and mail-in ballots,” *Ballotpedia*, Accessed on December 14, 20. [https://ballotpedia.org/Cure\\_period\\_for\\_absentee\\_and\\_mail-in\\_ballots](https://ballotpedia.org/Cure_period_for_absentee_and_mail-in_ballots)
- <sup>89</sup> Declaration of Jane Doe, Centre County, Pennsylvania, November 11, 2020.
- <sup>90</sup> The United States District Court for the Middle District of Pennsylvania, *Donald J. Trump for President et al v. Kathy Boockvar et al*, November 18, 2020. <https://www.courtlistener.com/recap/gov.uscourts.pamd.127057/gov.uscourts.pamd.127057.169.0.pdf>
- <sup>91</sup> The United States District Court for the Middle District of Pennsylvania, *Donald J. Trump for President et al v. Kathy Boockvar et al*, November 18, 2020. <https://www.courtlistener.com/recap/gov.uscourts.pamd.127057/gov.uscourts.pamd.127057.169.0.pdf>
- <sup>92</sup> Declaration of Bartholomew W. and Jean B. W., Milwaukee County, Wisconsin, November 16, 2020. See Also <https://www.jsonline.com/story/news/2020/11/11/fact-check-republicans-claim-wisconsin-clerks-illegally-altered-ballots/6234023002/>
- <sup>93</sup> Declaration of John Doe, Delaware County Pennsylvania, November 9, 2020.
- <sup>94</sup> State of Michigan Court of Appeals, “*Donald J. Trump for President et. al v. Jocelyn Benson*,” November 30, 2020. <https://www.democracymocket.com/wp-content/uploads/sites/45/2020/11/Trump-brief-FINAL.pdf>
- <sup>95</sup> Affidavit of Jane Doe, Washtenaw County, Michigan, November 9, 2020.
- <sup>96</sup> Cornell University, “Equal Protection,” *Legal Information Institute*, [https://www.law.cornell.edu/wex/equal\\_protection](https://www.law.cornell.edu/wex/equal_protection)
- <sup>97</sup> Lai, Jonathan et al, “Joe Biden won 3 of every 4 mail ballots in Pennsylvania. Trump won 2 of 3 votes cast in person. What does that mean for the future?” *The Philadelphia Inquirer*, <https://www.inquirer.com/politics/election/mail-ballots-pennsylvania-election-trump-biden-20201119.html>
- <sup>98</sup> Declaration of John Doe, County of Milwaukee, Wisconsin, November 11, 2020
- <sup>99</sup> Blair County, Berks County, Lancaster County, Carbon County, Clinton County, Lycoming County, Dauphin County, and Perry County.
- <sup>100</sup> *Joseph D. Hamm v. Kathy Boockvar*, Commonwealth Court of Pennsylvania, November 3, 2020. <http://www.pacourts.us/assets/files/setting-7723/file-10362.pdf?cb=f327ff>
- <sup>101</sup> Secretary of State of Arizona, “Voters have a limited amount of time to correct certain ballot issues,” November 9, 2020. <https://azsos.gov/about-office/media-center/press-releases/1248>
- <sup>102</sup> In the United States District Court for the District of Arizona, *Tyler Bowyer et al v.. Doug Ducey*, December 2, 2020. <https://www.democracymocket.com/wp-content/uploads/sites/45/2020/12/Bower-Complaint-AZ.pdf>
- <sup>103</sup> *National Conference of State Legislatures*, “Poll Watchers and Challengers,” October 1, 2020. <https://www.ncsl.org/research/elections-and-campaigns/poll-watcher-qualifications.aspx>
- <sup>104</sup> *National Conference of State Legislatures*, “Poll Watchers and Challengers,” October 1, 2020. <https://www.ncsl.org/research/elections-and-campaigns/poll-watcher-qualifications.aspx>
- <sup>105</sup> Affidavit of Jane Doe, Rockdale County, Georgia, November 2020.
- <sup>106</sup> Declaration of John Doe, Philadelphia, Pennsylvania, November 8, 2020.
- <sup>107</sup> Affidavit of Jane Doe, Brookfield, Wisconsin, November 10, 2020.
- <sup>108</sup> *Ballotpedia*, “Voting Equipment and Methods by State,” [https://ballotpedia.org/Voting\\_methods\\_and\\_equipment\\_by\\_state](https://ballotpedia.org/Voting_methods_and_equipment_by_state)
- <sup>109</sup> *Ballotpedia*, “Voting Equipment and Methods by State,” [https://ballotpedia.org/Voting\\_methods\\_and\\_equipment\\_by\\_state](https://ballotpedia.org/Voting_methods_and_equipment_by_state)
- <sup>110</sup> *Dominion Voting Systems*, “About,” <https://www.dominionvoting.com/about/>
- <sup>111</sup> Varnona, Frank “2020 Stolen Election by Dominion Voter Systems – Hammer & Scorecard,” *Conservative Business Journal*, <https://www.conservativebusinessjournal.com/2020-stolen-election-hammer-and-scorecard/>
- <sup>112</sup> *Clinton Foundation*, “The Delian Project,” <https://www.clintonfoundation.org/clinton-global-initiative/commitments/delian-project-democracy-through-technology>
- <sup>113</sup> For example, the Chairman of Smartmatic, Mark Malloch-Brown, is on the board of George Soros’ Open Society Foundation. *Open Society Foundation*, “Leadership,” <https://www.opensocietyfoundations.org/who-we-are/leadership/mark-malloch-brown>
- <sup>114</sup> The First Judicial Court in Carson City, Nevada, “*Jesse Law et al v. Judith Whitmer et al*,” November 17, 2020. <https://www.democracymocket.com/wp-content/uploads/sites/45/2020/11/nov-17-doc-2.pdf>
- <sup>115</sup> The First Judicial Court in Carson City, Nevada, “*Jesse Law et al v. Judith Whitmer et al*,” November 17, 2020. <https://www.democracymocket.com/wp-content/uploads/sites/45/2020/11/nov-17-doc-2.pdf>

<sup>116</sup> “In violation of Nevada law, the Clark County Election Department allows the Agilis machine to solely verify 30% of the signatures accompanying the mail-in ballots without ever having humanize inspect those signatures.”

<sup>117</sup> In the Superior Court of Arizona in and For the County of Maricopa, “*Kelli Ward v. Constance Jackson et al.*,” November 24, 2020. <https://assets.documentcloud.org/documents/20417265/ward-v-jackson-complaint-and-petition-for-discovery.pdf>

<sup>118</sup> In the Superior Court of Arizona in and For the County of Maricopa, “*Kelli Ward v. Constance Jackson et al.*,” November 24, 2020. <https://assets.documentcloud.org/documents/20417265/ward-v-jackson-complaint-and-petition-for-discovery.pdf>

<sup>119</sup> Affidavit of John Doe, Dallas County, Texas. November 17, 2020. [https://www.courtlistener.com/recap/gov.uscourts.gand.283580/gov.uscourts.gand.283580.7.1\\_2.pdf](https://www.courtlistener.com/recap/gov.uscourts.gand.283580/gov.uscourts.gand.283580.7.1_2.pdf)

<sup>120</sup> Ramsland Jr., Russell. “Antrim Michigan Forensics Report.” *William Bailey v. Antrim County, Michigan*, December 13, 2020. [https://depernolaw.com/uploads/2/7/0/2/27029178/antrim\\_michigan\\_forensics\\_report\\_\[121320\]\\_v2\\_\[redacted\].pdf](https://depernolaw.com/uploads/2/7/0/2/27029178/antrim_michigan_forensics_report_[121320]_v2_[redacted].pdf)

<sup>121</sup> “Excerpts from the 2002 FEC Voting System Standards – 3.2.1 Accuracy Requirements.” *Michigan Secretary of State*. <https://www.michigan.gov/sos/0,4670,7-127-1583-130621--,00.html>

<sup>122</sup> “Document Retention Schedule.” *Michigan Bureau of Elections*, May 2019. [https://www.michigan.gov/documents/sos/Document\\_Retention\\_Schedule\\_412493\\_7.pdf](https://www.michigan.gov/documents/sos/Document_Retention_Schedule_412493_7.pdf)

<sup>123</sup> Sperry, Paul. “Georgia voting irregularities: The curious case of Biden’s 20,000-vote surge.” *The Citizen*, November 15, 2020. <https://thecitizen.com/2020/11/15/georgia-voting-irregularities-the-curious-case-of-bidens-20000-vote-surge/>

<sup>124</sup> Parks, Miles, “Why Some Mail-In Ballots Are Rejected As Invalid,” *NPR*, October 4, 2020. <https://www.npr.org/2020/10/04/920175418/why-some-mail-in-ballots-are-rejected-as-invalid>

<sup>125</sup> Livingston, Doug, “Why absentee ballots get rejected, and how to make yours count,” *USA Today*, September 21, 2020. <https://www.beaconjournal.com/story/news/2020/09/21/why-absentee-ballots-rejected-presidential-and-other-elections/3486553001/>

<sup>126</sup> Livingston, Doug, “Why absentee ballots get rejected, and how to make yours count,” *USA Today*, September 21, 2020. <https://www.beaconjournal.com/story/news/2020/09/21/why-absentee-ballots-rejected-presidential-and-other-elections/3486553001/>

<sup>127</sup> Election Assistance Commission, “The Election Administration and Voting Survey; A Report to the United States Congress,” 2016. [https://www.eac.gov/sites/default/files/eac\\_assets/1/6/2016\\_EAVS\\_Comprehensive\\_Report.pdf](https://www.eac.gov/sites/default/files/eac_assets/1/6/2016_EAVS_Comprehensive_Report.pdf)

<sup>128</sup> *Ballotpedia*, “Election results, 2020: Analysis of rejected ballots,” December 11, 2020. [https://ballotpedia.org/Election\\_results,\\_2020:\\_Analysis\\_of\\_rejected\\_ballots](https://ballotpedia.org/Election_results,_2020:_Analysis_of_rejected_ballots)

See Also

*Office of Nevada Secretary of State Barbara K. Cegavske*, “2020 General Election Turnout Mail Ballot Information,” <https://www.nvsos.gov/sos/home/showdocument?id=9058>

<sup>129</sup> Election Assistance Commission, “The Election Administration and Voting Survey; A Report to the United States Congress,” 2016. [https://www.eac.gov/sites/default/files/eac\\_assets/1/6/2016\\_EAVS\\_Comprehensive\\_Report.pdf](https://www.eac.gov/sites/default/files/eac_assets/1/6/2016_EAVS_Comprehensive_Report.pdf)

<sup>130</sup> *Ballotpedia*, “Election results, 2020: Analysis of rejected ballots,” December 11, 2020. [https://ballotpedia.org/Election\\_results,\\_2020:\\_Analysis\\_of\\_rejected\\_ballots](https://ballotpedia.org/Election_results,_2020:_Analysis_of_rejected_ballots)

See Also

*U.S. Elections Project*, “Pennsylvania Early Voting Statistics,” November 20, 2020. <https://electproject.github.io/Early-Vote-2020G/PA.html>

<sup>131</sup> Election Assistance Commission, “The Election Administration and Voting Survey; A Report to the United States Congress,” 2016. [https://www.eac.gov/sites/default/files/eac\\_assets/1/6/2016\\_EAVS\\_Comprehensive\\_Report.pdf](https://www.eac.gov/sites/default/files/eac_assets/1/6/2016_EAVS_Comprehensive_Report.pdf)

<sup>132</sup> The Superior Court Of Fulton County State Of Georgia, *Trump v. Raffensperger*, December 4, 2020. <https://www.democracydocket.com/wp-content/uploads/sites/45/2020/12/Trump-v.-Raffensperger.pdf>

<sup>133</sup> For example, in Pennsylvania, 3 out of every 4 absentee/mail-in ballots went to Joe Biden <https://www.inquirer.com/politics/election/mail-ballots-pennsylvania-election-trump-biden-20201119.html>

And in Milwaukee, Wisconsin, 84% of absentee/mail-in ballots went to Joe Biden

<https://www.tmj4.com/news/election-2020/no-joe-biden-did-not-get-100-percent-of-all-milwaukee-absentee-ballots>

<sup>134</sup> Heine, Debra, “Mathematician Says Biden May Have Received 130 Percent of the Democrat Vote in Maricopa County, Arizona,” December 2, 2020. <https://themichiganstar.com/2020/12/02/mathematician-says-biden-may-have-received-130-percent-of-the-democrat-vote-in-maricopa-county-arizona/>

<sup>135</sup> Affidavit of Russel R., Dallas County, Texas. November 17, 2020. [https://www.courtlistener.com/recap/gov.uscourts.gand.283580/gov.uscourts.gand.283580.7.1\\_2.pdf](https://www.courtlistener.com/recap/gov.uscourts.gand.283580/gov.uscourts.gand.283580.7.1_2.pdf)

- 
- <sup>136</sup> *Milwaukee City Wire News Service*, “Analysis: Five Milwaukee wards report 89% turnout in 2020 presidential vote; Biden nets 146K votes in city,” November 4, 2020. <https://mkecitywire.com/stories/564495243-analysis-seven-milwaukee-wards-report-more-2020-presidential-votes-than-registered-voters-biden-nets-146k-votes-in-city>
- <sup>137</sup> *Milwaukee City Wire News Service*, “Analysis: Five Milwaukee wards report 89% turnout in 2020 presidential vote; Biden nets 146K votes in city,” November 4, 2020. <https://mkecitywire.com/stories/564495243-analysis-seven-milwaukee-wards-report-more-2020-presidential-votes-than-registered-voters-biden-nets-146k-votes-in-city>
- <sup>138</sup> Duda, Jeremy. “GOP lawsuit questions ‘duplicate’ ballots in Queen Creek,” *San Tan Valley Sentinel*, November 27, 2020. [https://www.pinalcentral.com/san\\_tan\\_valley\\_sentinel/local\\_news/gop-lawsuit-questions-duplicate-ballots-in-queen-creek/article\\_ee9557d0-97e4-53e9-a269-5beb4b64370a.html](https://www.pinalcentral.com/san_tan_valley_sentinel/local_news/gop-lawsuit-questions-duplicate-ballots-in-queen-creek/article_ee9557d0-97e4-53e9-a269-5beb4b64370a.html)
- <sup>139</sup> In the Superior Court of Arizona in and For the County of Maricopa, *Kelli Ward v. Constance Jackson et al*, November 24, 2020. <https://assets.documentcloud.org/documents/20417265/ward-v-jackson-complaint-and-petition-for-discovery.pdf>
- <sup>140</sup> *Voter Integrity Project*, “Anomalies in Vote Counts and Their Effects on Election 2020,” November 24, 2020. <https://votepatternanalysis.substack.com/p/voting-anomalies-2020>
- <sup>141</sup> *Voter Integrity Project*, “Anomalies in Vote Counts and Their Effects on Election 2020,” November 24, 2020. <https://votepatternanalysis.substack.com/p/voting-anomalies-2020>
- <sup>142</sup> *Voter Integrity Project*, “Anomalies in Vote Counts and Their Effects on Election 2020,” November 24, 2020. <https://votepatternanalysis.substack.com/p/voting-anomalies-2020>
- <sup>143</sup> News Now, “Michigan Republican Electors Harassed And Forced To Change Vote,” November 18, 2020. [https://www.youtube.com/watch?v=YW1YzQY\\_1Ro](https://www.youtube.com/watch?v=YW1YzQY_1Ro)
- Dowling, M. “Michigan’s largest county refuses to certify the election – Update, evil wins,” *Independent Sentinel*, November 17, 2020. <https://www.independentsentinel.com/michigans-largest-county-refuses-to-certify-the-election/>
- See Also
- Institute for Political Economy*, “Wayne County Michigan Withdraws Election Certification, Security Expert Concludes Michigan Was Stolen.” <https://www.newsbreak.com/news/2105758771365/wayne-county-michigan-withdraws-election-certification-security-expert-concludes-michigan-was-stolen>
- <sup>144</sup> Pentchoukov, Ivan, “Illegal Money-For-Votes Raffles Conducted in Several States in 2020 Election,” December 1, 2020. [https://www.theepochtimes.com/illegal-money-for-votes-raffles-conducted-in-several-states-in-2020-election\\_3598915.html](https://www.theepochtimes.com/illegal-money-for-votes-raffles-conducted-in-several-states-in-2020-election_3598915.html)
- <sup>145</sup> Ballotpedia, “Partisan composition of state legislatures,” December 4, 2020. [https://ballotpedia.org/Partisan\\_composition\\_of\\_state\\_legislatures](https://ballotpedia.org/Partisan_composition_of_state_legislatures)
- <sup>146</sup> *State of Texas v. The Commonwealth of Pennsylvania, State of Georgia, State of Michigan, State of Wisconsin*, “Motion for Leave to File Bill of Complaint,” December 7, 2020. [https://www.supremecourt.gov/DocketPDF/22/22O155/162953/20201207234611533\\_TX-v-State-Motion-2020-12-07%20FINAL.pdf](https://www.supremecourt.gov/DocketPDF/22/22O155/162953/20201207234611533_TX-v-State-Motion-2020-12-07%20FINAL.pdf) pg. 1
- <sup>147</sup> *State of Texas v. The Commonwealth of Pennsylvania, State of Georgia, State of Michigan, State of Wisconsin*, “Motion for Leave to File Bill of Complaint,” December 7, 2020. [https://www.supremecourt.gov/DocketPDF/22/22O155/162953/20201207234611533\\_TX-v-State-Motion-2020-12-07%20FINAL.pdf](https://www.supremecourt.gov/DocketPDF/22/22O155/162953/20201207234611533_TX-v-State-Motion-2020-12-07%20FINAL.pdf) pg. 1
- <sup>148</sup> Ballotpedia, “Partisan composition of state legislatures,” December 4, 2020. [https://ballotpedia.org/Partisan\\_composition\\_of\\_state\\_legislatures](https://ballotpedia.org/Partisan_composition_of_state_legislatures)