

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

WILLIAM FEEHAN,

CASE NO. 2:20-cv-1771

Plaintiffs.

v.

**WISCONSIN ELECTIONS COMMISSION,
and its members ANN S. JACOBS, MARK
L. THOMSEN, MARGE BOSTELMAN,
JULIE M. GLANCEY, DEAN KNUDSON,
ROBERT F. SPINDELL, JR., in their official
capacities, GOVERNOR TONY EVERS, in
his official capacity,**

Defendants.

**COMPLAINT FOR DECLARATORY, EMERGENCY, AND PERMANENT
INJUNCTIVE RELIEF**

NATURE OF THE ACTION

1. This civil action brings to light a massive election fraud, multiple violations of the Wisconsin Election Code, *see, e.g.*, Wis. Stat. §§ 5.03, *et. seq.*, in addition to the Election and Electors Clauses and Equal Protection Clause of the U.S. Constitution. These violations occurred during the 2020 General Election throughout the State of Wisconsin, as set forth in the affidavits of dozens of eyewitnesses and the statistical anomalies and mathematical impossibilities detailed in the affidavits of expert witnesses.

2. The scheme and artifice to defraud was for the purpose of illegally and fraudulently

manipulating the vote count to manufacture an election of Joe Biden as President of the United States, and also of various down ballot democrat candidates in the 2020 election cycle. The fraud was executed by many means, but the most fundamentally troubling, insidious, and egregious ploy was the systemic adaptation of old-fashioned “ballot-stuffing.” It has now been amplified and rendered virtually invisible by computer software created and run by domestic and foreign actors for that very purpose. This Complaint details an especially egregious range of conduct in Milwaukee County and the City of Milwaukee, along with Dane County, La Crosse County, Waukesha County, St. Croix County, Washington County, Bayfield County, Ozaukee County and various other counties throughout the Third District and throughout Wisconsin employing Dominion Systems, though this conduct occurred throughout the State at the direction of Wisconsin state election officials.

3. The multifaceted schemes and artifices implemented by Defendants and their collaborators to defraud resulted in the unlawful counting, or fabrication, of hundreds of thousands of illegal, ineligible, duplicate or purely fictitious ballots in the State of Wisconsin, that collectively add up to multiples of Biden’s purported lead in the State of 20,565 votes.

4. While this Complaint, and the eyewitness and expert testimony incorporated herein, identify with specificity sufficient ballots required to set aside the 2020 General Election results, the entire process is so riddled with fraud, illegality, and statistical impossibility that this Court, and Wisconsin’s voters, courts, and legislators, cannot rely on, or certify, any numbers resulting from this election. Accordingly, this Court must set aside the results of the 2020 General Election and grant the declaratory and injunctive relief requested herein.

Dominion Voting Systems Fraud and Manipulation

5. The fraud begins with the election software and hardware from Dominion Voting Systems Corporation (“Dominion”) used by the Wisconsin Board of State Canvassers. The Dominion systems derive from the software designed by Smartmatic Corporation, which became Sequoia in the United States.

6. Smartmatic and Dominion were founded by foreign oligarchs and dictators to ensure computerized ballot-stuffing and vote manipulation to whatever level was needed to make certain Venezuelan dictator Hugo Chavez never lost another election. *See* Ex. 1, Redacted Declaration of Dominion Venezuela Whistleblower (“Dominion Whistleblower Report”). Notably, Chavez “won” every election thereafter.

7. As set forth in the Dominion Whistleblower Report, the Smartmatic software was contrived through a criminal conspiracy to manipulate Venezuelan elections in favor of dictator Hugo Chavez:

Importantly, I was a direct witness to the creation and operation of an electronic voting system in a conspiracy between a company known as Smartmatic and the leaders of conspiracy with the Venezuelan government. This conspiracy specifically involved President Hugo Chavez Frias, the person in charge of the National Electoral Council named Jorge Rodriguez, and principals, representatives, and personnel from Smartmatic. The purpose of this conspiracy was to create and operate a voting system that could change the votes in elections from votes against persons running the Venezuelan government to votes in their favor in order to maintain control of the government. In mid-February of 2009, there was a national referendum to change the Constitution of Venezuela to end term limits for elected officials, including the President of Venezuela. The referendum passed. This permitted Hugo Chavez to be re-elected an unlimited number of times. . . .

Smartmatic’s electoral technology was called “Sistema de Gestión Electoral” (the “Electoral Management System”). Smartmatic was a pioneer in this area of computing systems. Their system provided for transmission of voting data over the internet to a computerized central tabulating center. The voting machines themselves had a digital display, fingerprint recognition feature to identify the voter, and printed out the voter’s ballot. The voter’s thumbprint was linked to a computerized record of that voter’s identity. Smartmatic created and operated the

entire system. *Id.* ¶¶ 10 & 14.

8. A core requirement of the Smartmatic software design ultimately adopted by Dominion for Wisconsin's elections was the software's ability to hide its manipulation of votes from any audit. As the whistleblower explains:

Chavez was most insistent that Smartmatic design the system in a way that the system could change the vote of each voter without being detected. He wanted the software itself to function in such a manner that if the voter were to place their thumb print or fingerprint on a scanner, then the thumbprint would be tied to a record of the voter's name and identity as having voted, but that voter would not be tracked to the changed vote. He made it clear that the system would have to be setup to not leave any evidence of the changed vote for a specific voter and that there would be no evidence to show and nothing to contradict that the name or the fingerprint or thumb print was going with a changed vote. Smartmatic agreed to create such a system and produced the software and hardware that accomplished that result for President Chavez. *Id.* ¶15.

9. The design and features of the Dominion software do not permit a simple audit to reveal its misallocation, redistribution, or deletion of votes. First, the system's central accumulator does not include a protected real-time audit log that maintains the date and time stamps of all significant election events. Key components of the system utilize unprotected logs. Essentially this allows an unauthorized user the opportunity to arbitrarily add, modify, or remove log entries, causing the machine to log election events that do not reflect actual voting tabulations—or more specifically, do not reflect the actual votes of or the will of the people.¹

10. This Complaint will show that Dominion violated physical security standards by connecting voting machines to the Internet, allowing Dominion, domestic third parties or hostile foreign actors to access the system and manipulate election results, and moreover potentially to

¹ See Ex. 7, August 24, 2020 Declaration of Harri Hursti, ¶¶45-48 (expert testimony in Case 1:17-cv-02989 in the U.S. District Court for the Northern District of Georgia). The Texas Secretary of State refused to certify Dominion for similar reasons as those cited by Mr. Hursti. See Ex. 9, State of Texas Secretary of State, Elections Division, Report of Review of Dominion Voting Systems Democracy Suite 5.5-A at 2 (Jan. 24, 2020).

cover their tracks due to Dominion's unprotected log. Accordingly, a thorough forensic examination of Dominion's machines and source code (pursuant to Wisconsin Statute § 5.905) is required to document these instances of voting fraud, as well as Dominion's systematic violations of the Voting Rights Act record retention requirements through manipulation, alteration, destruction and likely foreign exfiltration of voting records. See 52 U.S.C. § 20701.

11. These and other problems with Dominion's software have been widely reported in the press and been the subject of investigations. In certifying Dominion Voting Systems Democracy Suite, Wisconsin officials disregarded all the concerns that caused Dominion software to be rejected by the Texas Board of elections in 2020 because it was deemed vulnerable to undetected and non-auditable manipulation. Texas denied Certification because of concerns that it was not safe from fraud or unauthorized manipulation. (See Exhs 11 A and B).

12. An industry expert, Dr. Andrew Appel, Princeton Professor of Computer Science and Election Security Expert has recently observed, with reference to Dominion Voting machines: "I figured out how to make a slightly different computer program that just before the polls were closed, it switches some votes around from one candidate to another. I wrote that computer program into a memory chip and now to hack a voting machine you just need 7 minutes alone with a screwdriver."²

13. In addition to the Dominion computer fraud, this Complaint identifies several additional categories of "traditional" voting fraud that occurred as a direct result of Defendant Wisconsin Election Commission ("WEC") and other Defendants directing Wisconsin clerks and other election officials to ignore or violate the express requirements of the Wisconsin Election Code.

² Andrew W. Appel, *et al.*, "Ballot Marking Devices (BMDs) Cannot Assure the Will of the Voters" at (Dec. 27, 2019),(attached hereto as Exh. 10 ("Appel Study")).

First, the WEC issued “guidance” to county and municipal clerks not to reject “indefinitely confined” absentee voters, even if the clerks possess “reliable information” that the voter is no longer indefinitely confined, in direct contravention of Wisconsin Statute § 6.86(2)(6), which states that clerks must remove such voters. Second, the WEC issued further guidance directing clerks – in violation of Wisconsin Statute § 6.87(6)(d), which states that an absentee envelope certification “is missing the address of a witness, the ballot may not be counted” – to instead fill in the missing address information.

14. This Complaint presents expert witness testimony demonstrating that several hundred thousand illegal, ineligible, duplicate or purely fictitious votes must be thrown out, in particular:

- A. A report from Dr. William Briggs, showing that there were approximately 29,594 absentee ballots listed as “unreturned” by voters that either never requested them, or that requested and returned their ballots;
- B. Reports from Redacted Expert Witnesses who can show an algorithm was used to pick a winner.

15. In the accompanying redacted declaration of a former electronic intelligence analyst with 305th Military Intelligence with experience gathering SAM missile system electronic intelligence, the Dominion software was accessed by agents acting on behalf of China and Iran in order to monitor and manipulate elections, including the most recent US general election in 2020. (See Ex. 12, copy of redacted witness affidavit).

16. These and other “irregularities” demonstrate that at least 318,012 illegal ballots were counted in Wisconsin. This provides the Court with sufficient grounds to set aside the results of the 2020 General Election and provide the other declaratory and injunctive relief requested herein.

JURISDICTION AND VENUE

17. This Court has subject matter under 28 U.S.C. § 1331 which provides, “The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties

of the United States.”

18. This Court also has subject matter jurisdiction under 28 U.S.C. § 1343 because this action involves a federal election for President of the United States. “A significant departure from the legislative scheme for appointing Presidential electors presents a federal constitutional question.” *Bush v. Gore*, 531 U.S. 98, 113 (2000) (Rehnquist, C.J., concurring); *Smiley v. Holm*, 285 U.S. 355, 365 (1932).

19. The jurisdiction of the Court to grant declaratory relief is conferred by 28 U.S.C. §§ 2201 and 2202 and by Rule 57, Fed. R. Civ. P.

20. This Court has jurisdiction over the related Wisconsin constitutional claims and state-law claims under 28 U.S.C. § 1367.

21. Venue is proper because a substantial part of the events or omissions giving rise to the claim occurred in the Eastern District. 28 U.S.C. § 1391(b) & (c).

22. Because the United States Constitution reserves for state legislatures the power to set the time, place, and manner of holding elections for Congress and the President, state executive officers have no authority to unilaterally exercise that power, much less flout existing legislation.

THE PARTIES

23. Plaintiff William Feehan, is a registered Wisconsin voter and a nominee of the Republican Party to be a Presidential Elector on behalf of the State of Wisconsin. Mr. Feehan is a resident of the City of La Crosse and La Crosse County, Wisconsin.

24. Presidential Electors “have a cognizable interest in ensuring that the final vote tally reflects the legally valid votes cast,” as “[a]n inaccurate vote tally is a concrete and particularized injury to candidates such as the Electors.” *Carson v. Simon*, 978 F.3d 1051, 1057 (8th Cir. 2020) (affirming that Presidential Electors have Article III and prudential standing to challenge actions

of state officials implementing or modifying State election laws); *see also* *McPherson v. Blacker*, 146 U.S. 1, 27 (1892); *Bush v. Palm Beach Cty. Canvassing Bd.*, 531 U.S. 70, 76 (2000) (per curiam).

25. Plaintiff Feehan has standing to bring this action as a voter and as a candidate for the office of Elector under Wis. Stat. §§ 5.10, et seq (election procedures for Wisconsin electors). As such, Presidential Electors “have a cognizable interest in ensuring that the final vote tally reflects the legally valid votes cast,” as “[a]n inaccurate vote tally is a concrete and particularized injury to candidates such as the Electors.” *Carson v. Simon*, 978 F.3d 1051, 1057 (8th Cir. 2020) (affirming that Presidential Electors have Article III and prudential standing to challenge actions of state officials in implementing or modifying State election laws); *see also* *McPherson v. Blacker*, 146 U.S. 1, 27 (1892); *Bush v. Palm Beach Cty. Canvassing Bd.*, 531 U.S. 70, 76 (2000) (per curiam).

26. Plaintiff Derrick Van Orden is a former United States Navy SEAL, who was the 2020 Republican nominee for Wisconsin’s Third Congressional District Seat for the United States House of Representatives. Mr. Van Orden is a resident of Hager City, Pierce County, Wisconsin.

27. Mr. Van Orden “lost” by approximately 10,000 votes to the Democrat incumbent, U.S. Representative Ron Kind. Because of the illegal voting irregularities as will be shown below, Mr. Van Orden seeks to have a new election ordered by this court in the Third District, with that election being conducted under strict adherence with the Wisconsin Election Code.

28. Plaintiff Van Orden has standing as the ostensible “defeated” candidate in the Third Congressional District race, and seeks an order for a new election, complying with Wisconsin election law. Plaintiff Van Orden received 189,524 votes or 48.67% as tallied versus Ron Kind who received 199,870 or 51.33% of the votes as reportedly tallied.

29. Plaintiffs brings this action to prohibit certification of the election results for the Office of President of the United States in the State of Wisconsin and to obtain the other declaratory and injunctive relief requested herein. Those results were certified by Defendants on November 30, 2020, indicating a plurality for Mr. Biden of 20,565 votes out of 3,240,867 cast.

30. The Defendants are Wisconsin Elections Commission (“WEC”), a state agency, and its members Ann S. Jacobs, Mark L. Thomsen, Marge Bostelman, Julie M. Glancey, Dean Knudson, and Robert F. Spindell, Jr., in their official capacities

31. Defendant Governor Tony Evers is named as a defendant in his official capacity as Wisconsin’s governor.

32. Defendant WEC was created in 2015 by the Wisconsin Legislature as an independent agency under the Executive branch to administer Wisconsin’s election laws. Wis. Stat. §§ 5.03 & 15.61. The WEC is authorized to adopt administrative rules pursuant to Chapter 227 of the Wisconsin Statutes, but nothing under Wisconsin’s election laws authorizes the WEC to issue any documents, make any oral determinations or instruct governmental officials administering elections to perform any act contrary to Wisconsin law governing elections.

33. Furthermore, the Wisconsin Legislature also created municipal elections commissions for municipalities with a population greater than 500,000 and a county elections commissions for counties with a population greater than 750,000. Wis Stat. § 7.20. As a result, the City of Milwaukee Elections Commission was created as well as the Milwaukee County Elections Commission and the Dane County Elections Commission. These county and municipal elections commissions are responsible for administering the elections in their respective jurisdictions.

STATEMENT OF FACTS

34. Plaintiffs bring this action under 42 U.S.C. §§ 1983 and 1988, to remedy deprivations of rights, privileges, or immunities secured by the Constitution and laws of the United States and to contest the election results, and the corollary provisions under the Wisconsin Constitution.

35. The United States Constitution sets forth the authority to regulate federal elections. With respect to congressional elections, the Constitution provides:

The Times, Places and Manner of holding Elections for Senators and Representatives, shall be prescribed in each State by the Legislature thereof; but the Congress may at any time by Law make or alter such Regulations, except as to the Places of choosing Senators.

U.S. CONST. art. I, § 4 (“Elections Clause”).

36. With respect to the appointment of presidential electors, the Constitution provides:

Each State shall appoint, in such Manner as the Legislature thereof may direct, a Number of Electors, equal to the whole Number of Senators and Representatives to which the State may be entitled in the Congress: but no Senator or Representative, or Person holding an Office of Trust or Profit under the United States, shall be appointed an Elector.

U.S. CONST. art. II, § 1 (“Electors Clause”).

37. None of Defendants is a “Legislature” as required under the Elections Clause or Electors Clause to set the rules governing elections. The Legislature is “‘the representative body which ma[kes] the laws of the people.’” *Smiley*, 285 U.S. 365. Regulations of congressional and presidential elections, thus, “must be in accordance with the method which the state has prescribed for legislative enactments.” *Id.* at 367; *see also Ariz. State Legislature v. Ariz. Indep. Redistricting Comm’n*, 576 U.S. 787, 135 S. Ct. 2652, 2668 (U.S. 2015).

38. The WEC certified the Presidential Election results on November 30, 2020. The Presidential election results in Wisconsin show a difference of 20,565 “tallied” votes in favor of former Vice-President Joe Biden over President Trump.

39. Based upon all the allegations of fraud, statutory violations, and other misconduct, as stated herein and in the attached affidavits, it is necessary to enjoin the certification of the election results pending a full investigation and court hearing, and to order an independent audit of the November 3, 2020 election to ensure the accuracy and integrity of the election.

I. VIOLATIONS OF WISCONSIN ELECTION CODE

A. WEC Directed Clerks to Violate Wisconsin Election Code Requirements for Absentee Voting by “Indefinitely Confined” without Photo ID.

40. The Wisconsin State Legislature adopted Act 23 in 2011 to require Wisconsin electors to present an identification containing a photograph, such as a driver’s license, to either a municipal or county clerk, when registering to vote and when voting. Wis. Stat. §§ 6.34; 6.79 (2). The Wisconsin State Legislature adopted the photo ID requirement to deter the casting of ballots by persons either not eligible to vote or persons fraudulently casting multiple ballots. *League of Women Voters of Wisconsin Education Network, Inc. v. Walker*, 851 N.W.2d 302, 314 (Wis. 2014).

41. Wisconsin’s absentee voting is governed by Wisconsin Statutes § 6.84 - § 6.89. Under Wisconsin Statutes § 6.86, every absentee elector applicant must present a photo ID when registering to vote absentee except absentee voters who registered as “indefinitely confined,” Wis. Stat. § 6.86 (ac), meaning someone confined “because of age, physical illness or infirmity or is disabled for an indefinite period.” Wis. Stat. § 6.86(2)(a). As a result, Wisconsin election procedures for voting absentee based on “indefinitely confined” status circumvent the photo ID requirement, creating an avenue for fraudulent voting.

42. In order to ensure that only those who are “indefinitely confined” may use the “indefinitely confined” absentee ballot in an election, Wisconsin Statutes § 6.86 provides that any elector who files an application for an absentee ballot based on indefinitely confined status may not use the absentee ballot if the elector is no longer “indefinitely confined.” Wisconsin Statutes § 6.86 (2)(b) further

provides that the municipal clerk “shall remove the name of any other elector from the list upon request of the elector or upon receipt of reliable information that an elector no longer qualifies for the service.”

43. Despite this clear statutory requirement, the Administrator of the Wisconsin Election Commission, Meagan Wolfe, issued a written directive on May 13, 2020 to the clerks across the State of Wisconsin stating that the clerks cannot remove an allegedly “indefinitely confined” absentee voter from the absentee voter register if the clerk had “reliable information” that an allegedly “indefinitely confined” absentee voter is no longer “indefinitely confined.” The directive specifically stated:

Can I deactivate an absentee request if I believe the voter is not indefinitely confined? No. All changes to status must be made in writing and by the voter’s request. Not all medical illnesses or disabilities are visible or may only impact the voter intermittently. (See WEC May 13, 2020 Guidance Memorandum).

44. The WEC’s directive thus directly contradicts Wisconsin law, which specifically provides that clerks “shall” remove an indefinitely confined voter from the absentee voter list if the clerk obtains “reliable information” that the voter is no longer indefinitely confined.

45. As a result of the directive, clerks did not remove from the absentee voter lists maintained by their jurisdictions the absentee voters who claimed “indefinitely confined” status but who in fact were no longer “indefinitely confined.” This resulted in electors who were allegedly “indefinitely confined” absentee voters casting ballots as “indefinitely confined” absentee voters who were not actually “indefinitely confined” absentee voters.

B. WEC Directed Clerks to Violate Wisconsin Law Prohibiting Counting of Absentee Ballot Certificates Missing Witness Addresses.

46. In 2015, the Wisconsin Legislature passed Act 261, amending Wisconsin’s election laws, including a requirement, codified as Wisconsin Statute § 6.87(d), that absentee ballots include both

elector and witness certifications, which must include the address of the witness. If the address of the witness is missing from the witness certification, however, “the ballot may not be counted.” *Id.*

47. On October 18, 2016, WEC reacted to this legislation by issuing a memorandum, which, among other things, permitted clerks to write in the witness address onto the absentee ballot certificate itself, effectively nullifying this express requirement. (*See* WEC October 18, 2016 Guidance Memorandum). Wisconsin election officials reiterated this unlawful directive in publicly posted training videos. For example, in a Youtube video posted before the November 3, 2020 General Election by Clarie Woodall-Voog of the Milwaukee Elections Commission, Ms. Woodall-Voog advised clerks that missing items “like witness address may be written in red.”³

C. WEC Directed Clerks to Illegally Cure Absentee Ballots by Filling in Missing Information on Absentee Ballot Certificates and Envelopes.

48. On October 19, 2020, WEC instructed its clerks that, without any legal basis in the Wisconsin Election Code, they could simply fill in missing witness or voter certification information using, e.g., personal knowledge, voter registration information, or calling the voter or witness. The WEC further advised that voters or witnesses could cure any missing information at the polling place, again without citing any authority to do so under Wisconsin Election Code.

**II. EXPERT WITNESS TESTIMONY:
EVIDENCE OF WIDESPREAD VOTER FRAUD**

A. Approximately 15,000 Wisconsin Mail-In Ballots Were Lost, and Approximately 18,000 More Were Fraudulently Recorded for Voters who Never Requested Mail-In Ballots.

49. The attached report of William M. Briggs, Ph.D. (“Dr. Briggs Report”) summarizes the multi-state phone survey that includes a survey of Wisconsin voters collected by Matt Braynard,

³ *See* <https://www.youtube.com/watch?v=hbm-pPaYiqk> (video a 10:43 to 11:07).

which was conducted from November 15-17, 2020. *See* Ex. 101, Dr. Briggs Report at 1, and Att. 1 (“Braynard Survey”). The Briggs analysis identified two specific errors involving unreturned mail-in ballots that are indicative of voter fraud, namely: “**Error #1:** those who were recorded as receiving absentee ballots *without* requesting them;” and “**Error #2:** those who returned absentee ballots but whose votes went missing (*i.e.*, marked as unreturned).” *Id.* Dr. Briggs then conducted a parameter-free predictive model to estimate, within 95% confidence or prediction intervals, the number of ballots affected by these errors out of a total of 96,771 unreturned mail-in ballots for the State of Wisconsin.

50. With respect to **Error #1**, Dr. Briggs’ analysis estimated that **16,316-19,273 ballots** out of the total 96,771 unreturned ballots were recorded for voters who had **not** requested them. *Id.* With respect to **Error #2**, he found **13,991 – 16,757 ballots** out of 96,771 unreturned ballots recorded for voters who **did return their ballots were recorded as being unreturned**. *Id.* Taking the average of the two types of errors together, **29,594 ballots, or 31% of the total, are “troublesome.”**

51. These errors are not only conclusive evidence of widespread fraud by the State of Wisconsin, but they are fully consistent with the fact witness statements cited above regarding the evidence about Dominion presented below insofar as **these unreturned absentee ballots represent a pool of blank ballots that could be filled in by third parties to shift the election to Joe Biden**, and also present the obvious conclusion that there must be absentee ballots unlawfully ordered by third parties that were returned.

52. With respect to **Error #1**, Dr. Briggs’ analysis demonstrates that approximately **17,795 absentee ballots were sent to someone besides the registered voter named in the request**, and thus could have been filled out by anyone and then submitted in the name of another voter.

Regarding ballots ordered by third parties that were voted, those would no longer be in the unreturned pool and therefore cannot be estimated from this data set.

53. With respect to **Error #2**, Dr. Briggs' analysis indicates that approximately **15,374 absentee ballots were either lost or destroyed** (consistent with allegations of Trump ballot destruction) **and/or were replaced with blank ballots filled out by election workers, Dominion or other third parties**. Dr. Briggs' analysis shows that 31% of "unreturned ballots" suffer from one of the two errors above – which is consistent with his findings in the four other States analyzed (Arizona 58%, Georgia 39%, Pennsylvania 37%, and Wisconsin 45%) – and provides further support that these widespread "irregularities" or anomalies were one part of a much larger multi-state fraudulent scheme to rig the 2020 General Election for Joe Biden.

B. Nearly 7,000 Ineligible Voters Who Have Moved Out-of-State Illegally Voted in Wisconsin.

54. Evidence compiled by Matt Braynard using the National Change of Address ("NCOA") Database shows that 6,207 Wisconsin voters in the 2020 General Election moved out-of-state prior to voting, and therefore were ineligible. Mr. Braynard also identified 765 Wisconsin voters who subsequently registered to vote in another state and were therefore ineligible to vote in the 2020 General Election. The merged number is 6,966 ineligible voters whose votes must be removed from the total for the 2020 General Election.⁴

C. A Statistical Study Reveals that Biden Overperformed in those Precincts that Relied on Dominion Voting Machines

55. From November 13th, 2020 through November 28th, 2020, the Affiant conducted in-depth statistical analysis of publicly available data on the 2020 U.S. Presidential Election. This data

⁴ Mr. Braynard posted the results of his analysis on Twitter. See <https://twitter.com/MattBraynard/status/1329700178891333634?s=20>. This Complaint includes a copy of his Report, (attached hereto as Exh. 3).

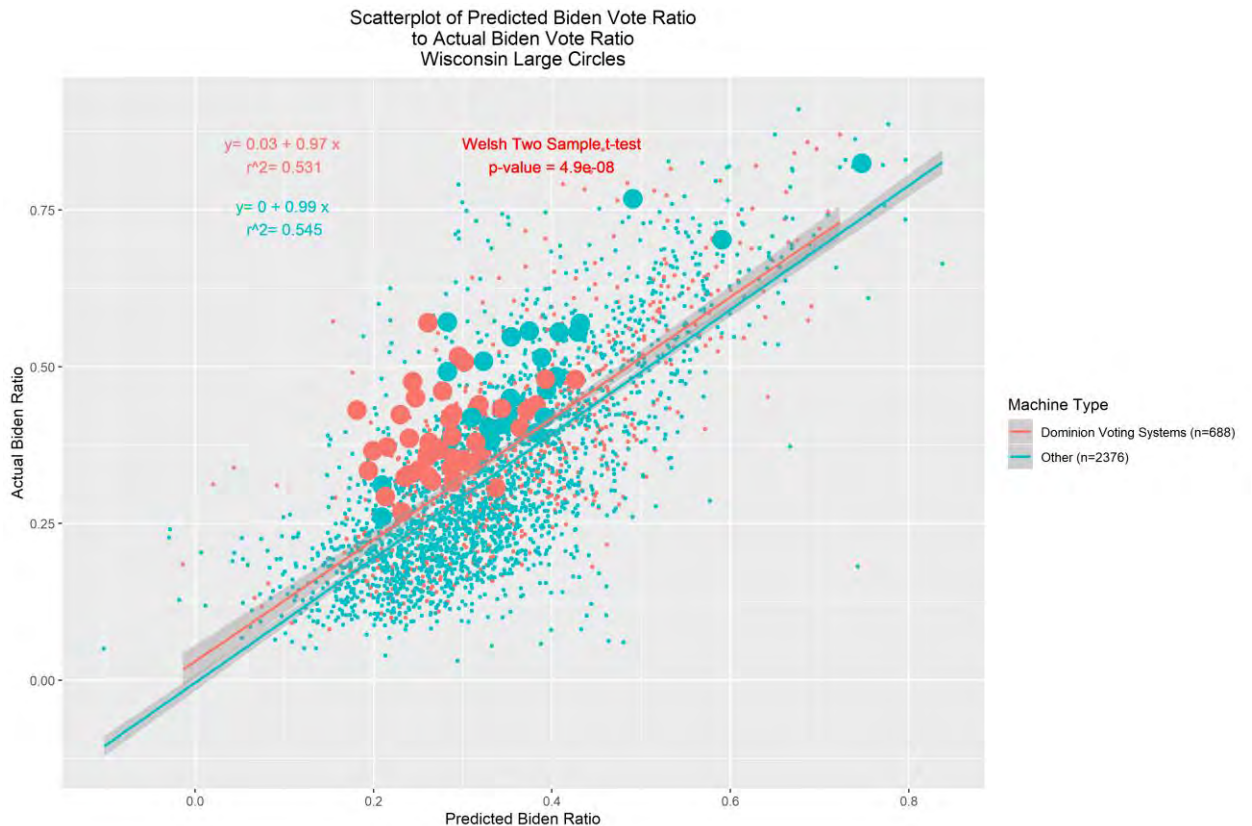
included vote counts for each county in the United States, U.S. Census data, and type of voting machine data provided by the U.S. Election Assistance Committee. The Affiant's analysis yielded several "red flags" concerning the percentage of votes won by candidate Biden in counties using voting machines provided by Dominion Voting Systems. These red flags occurred in several States in the country, including Wisconsin. (See attached hereto as Exh. 4, copy of redacted Affiant, B.S. Mathematics and M.S. Statistics).

56. The Affiant began by using Chi-Squared Automatic Interaction Detection (CHAID), which treats the data in an agnostic way—that is, it imposes no parametric assumptions that could otherwise introduce bias. Affiant posed the following question: "Do any voting machine types appear to have unusual results?" The answer provided by the statistical technique/algorithm was that machines from Dominion Voting Systems (Dominion) produced abnormal results. *Id.*

57. Subsequent graphical and statistical analysis shows the unusual pattern involving machines from Dominion occurs in at least 100 counties and multiple States, including Wisconsin. The results from the vast majority of counties using the Dominion machines is 3 to 5.6 percentage points higher in favor of candidate Biden. This pattern is seen easily in graphical form when the results from "Dominion" counties are overlaid against results from "non-Dominion" counties. The results from "Dominion" counties do not match the results from the rest of the counties in the United States. The results are clearly statistically significant, with a p-value of < 0.00004 . This translates into a statistical impossibility that something unusual involving Dominion machines is *not* occurring. This pattern appears in multiple States, including Wisconsin, and the margin of votes implied by the unusual activity would easily sway the election results. *Id.*

58. The following graph shows the pattern. The large red dots are counties in Wisconsin that use Dominion voting machines. Almost all of them are above the blue prediction line, when in

normal situations approximately half of them would be below the prediction line (as evidence by approximately half the counties in the U.S. (blue dots) that are below the blue centerline). The p-value of statistical analysis regarding the centerline for the red dots (Wisconsin counties with Dominion machines) is 0.000000049, pointing to a statistical impossibility that this is a “random” statistical anomaly. Some external force caused this anomaly:



Id.

59. To confirm that Dominion machines were the source of the pattern/anomaly, Affiant conducted further analysis using propensity scoring using U.S. census variables (including ethnicities, income, professions, population density and other social/economic data), which was used to place counties into paired groups. Such an analysis is important because one concern could be that counties with Dominion systems are systematically different from their counterparts, so

abnormalities in the margin for Biden are driven by other characteristics unrelated to the election. *Id.*

60. After matching counties using propensity score analysis, the only difference between the groups was the presence of Dominion machines. This approach again showed a highly statistically significant difference between the two groups, with candidate Biden again averaging three percentage points higher in Dominion counties than in the associated paired county. The associated p-value is < 0.00005 , against indicating a statistical impossibility that something unusual is not occurring involving Dominion machines. *Id.*

61. The results of the analysis and the pattern seen in the included graph strongly suggest a systemic, system-wide algorithm was enacted by an outside agent, causing the results of Wisconsin's vote tallies to be inflated by somewhere between three and five point six percentage points. **Statistical estimating yields that in Wisconsin, the best estimate of the number of impacted votes is 181,440.** *Id.*

62. The summation of sections A through C above provide the following conclusions for the reports cited above, respectively.

- returned ballots that were deemed unreturned by the state: 15,374
- unreturned mail ballots unlawfully ordered by third parties: 17,795
- votes by persons that moved out of state or subsequently registered to vote in another state for the 2020 election: 6,966
- Votes that were improperly relying on the "indefinitely confined" exemption to voter ID: 96,437
- And excess votes arising from the statistically significant outperformance of Dominion machines on behalf of Joe Biden: 181,440

In Conclusion, the Reports cited above show a total amount of illegal votes identified that amount to 318,012 or over 15 times the margin by which candidate Biden leads President Trump in the state of Wisconsin.

III. FACTUAL ALLEGATIONS REGARDING DOMINION VOTING SYSTEMS

63. The State of Wisconsin, in many locations, used either Sequoia, a subsidiary of Dominion Systems, and or Dominion Systems, Democracy Suite 4.14-D first, and then included Dominion Systems Democracy Suite 5.0-S on or about January 27, 2017, which added a fundamental modification: “dial-up and wireless results transmission capabilities to the ImageCast Precinct and results transmission using the Democracy Suite EMS Results Transfer Manager module.” (See Exh. 5, attached hereto, a copy of the Equipment for WI election systems).

A. Dominion’s Results for 2020 General Election Demonstrate Dominion Manipulated Election Results.

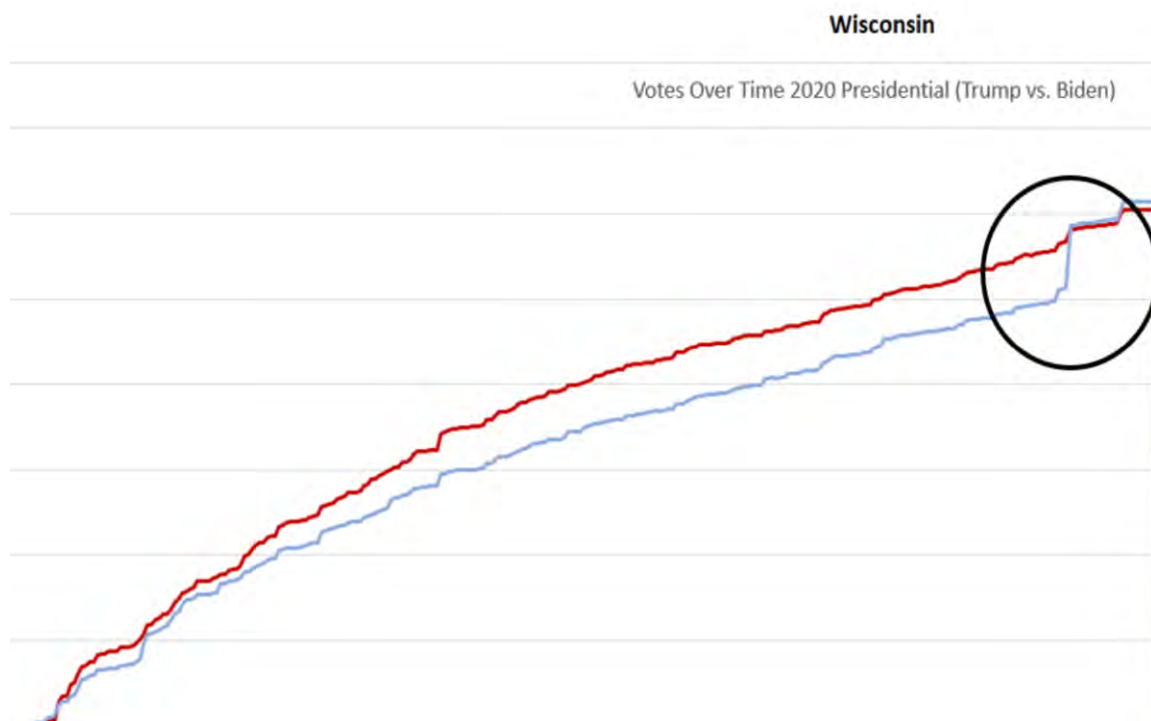
64. Affiant Keshel’s findings that reflect the discussion cited above:

While Milwaukee County is focal for transparency and observation violations, including reporting statistically impossible vote counts in the early morning hours away from scrutiny, Dane County has surged far past support totals for President Obama, despite expected difficulties mobilizing student voters to polls. President Trump has reconsolidated the Republican base in suburban Milwaukee and far surpassed his 2016 support levels but has been limited in margin growth by historically improbable Democratic support in these strongholds, which defy years of data in Wisconsin in which the Republican party surged as the Democratic Party plunged. Finally, in strong Trump counties showing a double inversion cycle (one party up, the other down), particularly in rural and exurban Wisconsin, Trump’s totals are soaring, and against established trends, Biden’s totals are at improbable levels of support despite lacking registration population (See attached hereto, Exh. 9, Aff. of Seth Keshel, MBA)

| County | Rep '08 | Dem '08 | Rep '12 | Dem '12 | Rep '16 | Dem '16 | Rep '20 | Dem '20 | Dem Percentage of Obama 2008 Votes |
|------------|---------|---------|---------|---------|---------|---------|---------|---------|------------------------------------|
| Ozaukee | 32,172 | 20,579 | 36,077 | 19,159 | 30,464 | 20,170 | 33,912 | 26,515 | 128.8% |
| % Increase | N/A | N/A | 12.1% | (6.9%) | (15.6%) | 5.3% | 11.3% | 31.5% | |
| ---- | | | | | | | | | |
| Dane | 73,065 | 205,984 | 83,644 | 216,071 | 71,275 | 217,697 | 78,789 | 260,157 | 126.3% |
| % Increase | N/A | N/A | 14.5% | 4.9% | (14.8%) | 0.8% | 10.5% | 19.5% | |
| ---- | | | | | | | | | |
| Waukesha | 145,152 | 85,339 | 162,798 | 78,779 | 142,543 | 79,224 | 159,633 | 103,867 | 121.7% |
| % Increase | N/A | N/A | 12.2% | (7.7%) | (12.4%) | 0.6% | 12.0% | 31.1% | |
| ---- | | | | | | | | | |
| Racine | 45,954 | 53,408 | 49,347 | 53,008 | 46,681 | 42,641 | 54,475 | 50,154 | 117.6% |
| % Increase | N/A | N/A | 7.4% | (0.7%) | (5.4%) | (19.6%) | 16.7% | 17.6% | |

Id.

65. Keshel provides a graph reflecting the voter returns in a time-series. The highly unlikely and remarkably convenient attainment of this block of votes provides for a stunning depiction of the election and generates many questions. The analysis provided by Plaintiffs' multiple experts, including data, statistics and cyber, will reveal clear evidence of the multiple frauds that combined to change the outcome of the 2020 election.



See Id.

B. Administrative and Judicial Decisions Regarding Dominion's Security Flaws.

66. **Wisconsin.** In 2018, Jill Stein was in litigation with Dominion Voting Systems (“DVS”) after her 2016 recount request pursuant to WISCONSIN STAT. §5.905(4) wherein DVS obtained a Court Order requiring confidentiality on information including *voting counting source code*, which Dominion claims is proprietary – and must be kept secret from the public. (*See* unpublished decision, Wisconsin Court of Appeals, No. 2019AP272 issued April 30, 2020). Rather than engaging in an open and transparent process to give credibility to Wisconsin's Dominion-Democracy Suite voting system, the processes were hidden during the receipt, review, opening, and tabulation of those votes in direct contravention of Wisconsin's Election Code and Federal law.

67. **Texas.** The same Dominion Democracy Suite was denied certification in Texas by the

Secretary of State on January 24, 2020, specifically because the “examiner reports raise concerns about whether Democracy Suite 5.5-A system ... **is safe from fraudulent or unauthorized manipulation.**”⁵

68. **Georgia.** Substantial evidence of this vulnerability was discussed in Judge Amy Totenberg’s October 11, 2020 Order in the USDC N.D. Ga. case of *Curling, et al. v. Kemp, et. al.*, Case No. 1:17-cv-02989 Doc. No. 964. *See*, p. 22-23 (“This array of experts and subject matter specialists provided a huge volume of significant evidence regarding the security risks and deficits in the system as implemented in both witness declarations and live testimony at the preliminary injunction hearing.”); p. 25 (“In particular, Dr. Halderman’s testing indicated the practical feasibility through a cyber attack of causing the swapping or deletion of specific votes cast and the compromise of the system through different cyber attack strategies, including through access to and alteration or manipulation of the QR barcode.”) The full order should be read, for it is eye-opening and refutes many of Dominion’s erroneous claims and talking points.

69. A District Judge found that Dominion’s BMD ballots are not voter verifiable, and they cannot be audited in a software independent way. The credibility of a BMD ballot can be no greater than the credibility of Dominion’s systems, which copious expert analysis has shown is deeply compromised. Similar to the issues in Wisconsin, Judge Totenberg of the District Court of Georgia Northern District held:

Georgia’s Election Code mandates the use of the BMD system as the uniform mode of voting for all in-person voters in federal and statewide elections. O.C.G.A. § 21-2-300(a)(2). The statutory provisions mandate voting on “electronic ballot markers” that: (1) use “electronic technology to independently and privately mark a paper ballot at the direction of an elector, interpret ballot selections, ... such interpretation **for elector verification**, and print **an elector verifiable paper**

⁵ See attached hereto, as Exh. 11, State of Texas Secretary of State, Elections Division, *Report of Review of Dominion Voting Systems Democracy Suite 5.5-A* at 2 (Jan. 24, 2020) (emphasis added).

ballot;” and (2) “produce paper ballots which are marked with the elector’s choices **in a format readable by the elector**” O.C.G.A. § 21-2-2(7.1); O.C.G.A. § 21-2-300(a)(2). Plaintiffs and other voters who wish to vote in-person are required to vote on **a system that does none of those things**. Rather, the evidence shows that the Dominion BMD system does **not produce a voter-verifiable paper ballot or a paper ballot marked with the voter’s choices in a format readable by the voter because the votes are tabulated solely from the unreadable QR code**.

See Order, pp. 81-82. (Emphasis added).

70. This case was later affirmed in a related case, in the Eleventh Circuit in 2018 related to Georgia’s voting system in *Common Cause Georgia v. Kemp*, 347 F. Supp. 3d 1270 (11th Cir. 2018). The Court found,

In summary, while further evidence will be necessary in the future, the Court finds that the combination of the statistical evidence and witness declarations in the record here (and the expert witness evidence in the related *Curling* case which the Court takes notice of) persuasively demonstrates the likelihood of Plaintiff succeeding on its claims. Plaintiff has shown a substantial likelihood of proving that the Secretary’s failure to properly maintain a reliable and secure voter registration system has and will continue to result in the infringement of the rights of the voters to cast their vote and have their votes counted.

Id. at 1294-1295.

71. The expert witness in the above litigation in the United States District Court of Georgia, Case 1:17-cv-02989-AT, Harri Hursti, specifically testified to the acute security vulnerabilities, *see* Ex. 107, wherein he testified or found:

A. “The scanner and tabulation software settings being employed to determine which votes to count on hand marked paper ballots are likely causing clearly intentioned votes to be counted” “The voting system is being operated in Fulton County in a manner that escalates the security risk to an extreme level” “Votes are not reviewing their BMD printed ballots, which causes BMD generated results to be un-auditable due to the untrustworthy audit trail.” 50% or more of voter selections in some counties were visible to poll workers. Dominion employees maintain near exclusive control over the EMS servers. “In my professional opinion, the role played by Dominion personnel in Fulton County, and other counties with similar arrangements, should be considered an elevated risk factor when evaluating the security

risks of Georgia's voting system." *Id.* ¶26.

- B. A video game download was found on one Georgia Dominion system laptop, suggesting that multiple Windows updates have been made on that respective computer.
- C. There is evidence of remote access and remote troubleshooting which presents a grave security implication.
- D. Certified identified vulnerabilities should be considered an "extreme security risk."
- E. There is evidence of transfer of control the systems out of the physical perimeters and place control with a third party off site.
- F. USB drives with vote tally information were observed to be removed from the presence of poll watchers during a recent election.
- G. "The security risks outlined above – operating system risks, the failure to harden the computers, performing operations directly on the operating systems, lax control of memory cards, lack of procedures, and potential remote access are extreme and destroy the credibility of the tabulations and output of the reports coming from a voting system." *Id.* ¶49.

C. Foreign Interference/Hacking and/or Manipulation of Dominion Results.

1. Evidence of Vulnerability to Foreign Hackers.

72. In October of 2020 The FBI and CISA issued a JOINT CYBERSECURITY ADVISORY ON October 30, 2020 titled: **Iranian Advanced Persistent Threat Actor Identified Obtained Voter Registration Data**

This joint cybersecurity advisory was coauthored by the Cybersecurity and Infrastructure Security Agency (CISA) and the Federal Bureau of Investigation (FBI). CISA and the FBI are aware of an Iranian advanced persistent threat (APT) actor targeting U.S. state websites to include election websites. CISA and the FBI assess this actor is responsible for the mass dissemination of voter intimidation emails to U.S. citizens and the dissemination of U.S. election-related disinformation in mid-October 2020.¹ (Reference FBI FLASH message ME-000138-TT, disseminated October 29, 2020). Further evaluation by CISA and the FBI has identified the targeting of U.S. state election websites was an intentional effort to influence and interfere with the 2020 U.S. presidential election.

(See CISA and FBI Joint Cyber Security Advisory of October 30, 2020, a copy attached hereto as Exh. 18.)

73. An analysis of the Dominion software system by a former US Military Intelligence expert subsequently found that the Dominion Voting system and software are accessible - and was compromised by rogue actors, including foreign interference by Iran and China. (See Exh. 1, Spider Declaration, (who remains redacted for security reasons).)

74. The expert does an analysis and explains how by using servers and employees connected with rogue actors and hostile foreign influences combined with numerous easily discoverable leaked credentials, Dominion allowed foreign adversaries to access data and intentionally provided access to Dominion's infrastructure in order to monitor and manipulate elections, including the most recent one in 2020. (See Exh. 12, Spider Declaration. Several facts are set forth related to foreign members of Dominion Voting Systems and foreign servers as well as foreign interference.).

75. Another Declarant first explains the foundations of her opinion and then addresses the concerns of foreign interference in our elections through hardware components from companies based in foreign countries with adverse interests. She explains that Dominion Voting Systems works with SCYTL, and that votes on route, before reporting, go to SCYTL in foreign countries. On the way, they get mixed and an algorithm is applied, which is done through a secretive process.

The core software used by ALL SCYTL related Election Machine/Software manufacturers ensures "anonymity" Algorithms within the area of this "shuffling" to maintain anonymity allows for setting values to achieve a desired goal under the guise of "encryption" in the trap-door...

(See Exh. 13, Aff. of Computer analysis, at par. 32).

76. The Affiant goes on to explain the foreign relationships in the hardware used by Dominion Voting Systems and its subsidiary Sequoia and explains specifically the port that

Wisconsin uses, which is called Edge Gateway and that is a part of Akamai Technologies based in Germany:

“Wisconsin has EDGE GATEWAY port which is AKAMAI TECHNOLOGIES based out of GERMANY. Using AKAMAI Technologies is allowing .gov sites to obfuscate and mask their systems by way of HURRICANE ELECTRIC (he.net)”

77. This Declarant further explains the foundations of her opinion and then addresses the concerns of foreign interference in our elections through hardware components from companies based in foreign countries with adverse interests.

The concern is the HARDWARE and the NON – ACCREDITED VSTLs as by their own admittance use COTS. The purpose of VSTL’s being accredited and their importance is ensuring that there is no foreign interference / bad actors accessing the tally data via backdoors in equipment software. The core software used by ALL SCYTL related Election Machine/Software manufacturers ensures “anonymity”. **Algorithms within the area of this “shuffling” to maintain anonymity allows for setting values to achieve a desired goal under the guise of “encryption” in the trap-door...**

(See Id. at ¶32).

78. This Declarant goes on to explain the foreign relationships in the hardware used by Dominion Voting Systems and its subsidiary Sequoia and specifically the port that Wisconsin uses:

“Wisconsin has EDGE GATEWAY port which is AKAMAI TECHNOLOGIES based out of GERMANY. Using AKAMAI Technologies is allowing .gov sites to obfuscate and mask their systems by way of HURRICANE ELECTRIC (he.net) Kicking it to anonymous (AKAMAI Technologies) offshore servers. Wisconsin Port.

China is not the only nation involved in COTS provided to election machines or the networking but so is Germany via a LAOS founded Chinese linked cloud service company that works with SCYTL named Akamai Technologies that have offices in China and are linked to the server [for] Dominion Software.

(See Id. at par. 21).

79. The Affiant explains the use of an algorithm and how it presents throughout the statement, but specifically concludes that,

The “Digital Fix” observed with an increased spike in VOTES for Joe Biden can be determined as evidence of a pivot. Normally it would be assumed that the algorithm had a Complete Pivot. Wilkinson’s demonstrated the guarantee as:

$$\frac{\|U\|_{\infty}}{\|A\|_{\infty}} \leq n^{\frac{1}{2} \log(n)}$$

Such a conjecture allows the growth factor the ability to be upper bound by values closer to n . Therefore, complete pivoting can’t be observed because there would be too many floating points. Nor can partial as the partial pivoting would overwhelm after the “injection” of votes. Therefore, external factors were used which is evident from the “DIGITAL FIX.” (*See Id.* at pars. 67-69)

“The algorithm looks to have been set to give Joe Biden a 52% win even with an initial 50K+ vote block allocation was provided initially as tallying began (as in case of Arizona too). In the am of November 4, 2020 the algorithm stopped working, therefore another “block allocation” to remedy the failure of the algorithm. This was done manually as ALL the SYSTEMS shut down NATIONWIDE to avoid detection.”

(*See Id.* at par. 73)

2. Background of Dominion Connections to Smartmatic and Hostile Foreign Governments.

80. An expert analysis by Russ Ramsland agrees with the data reflecting the use of an algorithm that causes the spike in the data feed, which is shown to be an injection of votes to change the outcome, because natural reporting does not appear in such a way.

81. And Russ Ramsland can support that further by documenting the data feed that came from Dominion Voting Systems to Scytl -- and was reported with decimal points, which is contrary to one vote as one ballot: **“The fact that we observed raw vote data coming directly that includes decimal places establishes selection by an algorithm, and not individual voter’s choice. Otherwise, votes would be solely represented as whole numbers (votes cannot possibly be added up and have decimal places reported).”**

82. The report concludes that “Based on the foregoing, I believe these statistical anomalies and impossibilities compels the conclusion to a reasonable degree of professional certainty that the

vote count in Wisconsin, in particular for candidates for President contain at least 119,430 (Para. 13) up to 384,085 (Para. 15) illegal votes that must be disregarded. In my opinion, it is not possible at this time to determine the true results of the Wisconsin vote for President of the United States.”

The History of Dominion Voting Systems

83. Plaintiffs can also show Smartmatic’s incorporation and inventors who have backgrounds evidencing their foreign connections, including Serbia, specifically its identified inventors:

Applicant: SMARTMATIC, CORP.

Inventors: Lino Iglesias, Roger Pinate, Antonio Mugica, Paul Babic, Jeffrey Naveda, Dany Farina, Rodrigo Meneses, Salvador Ponticelli, Gisela Goncalves, Yrem Caruso⁶

84. Another Affiant witness testifies that in Venezuela, she was in official position related to elections and witnessed manipulations of petitions to prevent a removal of President Chavez and because she protested, she was summarily dismissed. She explains the vulnerabilities of the electronic voting system and Smartmatica to such manipulations. (See Ex. 17, Cardozo Aff. ¶8).

3. US Government Warnings Regarding Hacking by Hostile Foreign Governments.

85. In October of 2020 The FBI and CISA issued a JOINT CYBERSECURITY ADVISORY ON October 30, 2020 titled: **Iranian Advanced Persistent Threat Actor Identified Obtained Voter Registration Data**

This joint cybersecurity advisory was coauthored by the Cybersecurity and Infrastructure Security Agency (CISA) and the Federal Bureau of Investigation (FBI). CISA and the FBI are aware of an Iranian advanced persistent threat (APT) actor targeting U.S. state websites to include election websites. CISA and the FBI

⁶ See Patents Assigned to Smartmatic Corp., *available at*: <https://patents.justia.com/assignee/smartmatic-corp>

assess this actor is responsible for the mass dissemination of voter intimidation emails to U.S. citizens and the dissemination of U.S. election-related disinformation in mid-October 2020.¹ (Reference FBI FLASH message ME-000138-TT, disseminated October 29, 2020). Further evaluation by CISA and the FBI has identified the targeting of U.S. state election websites was an intentional effort to influence and interfere with the 2020 U.S. presidential election.

(See Ex. 18, CISA and FBI Joint Cyber Security Advisory of October 30, 2020)

D. Additional Independent Findings of Dominion Flaws.

86. Further supportive of this pattern of incidents, reflecting an absence of mistake, Plaintiffs have since learned that the “glitches” in the Dominion system, that have the uniform effect of hurting Trump and helping Biden, have been widely reported in the press and confirmed by the analysis of independent experts.

1. Central Operator Can Remove, Discard or Manipulate Votes.

87. Mr. Watkins further explains **that the central operator can remove or discard batches of votes**. “After all of the ballots loaded into the scanner’s feed tray have been through the scanner, the “ImageCast Central” operator will remove the ballots from the tray then have the option to either “Accept Batch” or “Discard Batch” on the scanning menu “ (Ex. 106, Watkins aff. ¶11). ¶18.

88. Mr. Watkins further testifies that the user manual makes clear that the system allows for threshold settings to be set to find all ballots get marked as “problem ballots” for discretionary determinations on where the vote goes stating:

9. During the ballot scanning process, the “ImageCast Central” software will detect how much of a percent coverage of the oval was filled in by the voter. The Dominion customer determines the thresholds of which the oval needs to be covered by a mark in order to qualify as a valid vote. If a ballot has a marginal mark which did not meet the specific thresholds set by the customer, then the ballot is considered a “problem ballot” and may be set aside into a folder named “NotCastImages”.

10. Through creatively tweaking the oval coverage threshold settings, and advanced settings on the ImageCase Central scanners, it may be possible to set thresholds in such a way that a non-trivial amount of ballots are marked “problem ballots” and sent to the “NotCastImages” folder.

11. The administrator of the ImageCast Central work station may view all images of scanned ballots which were deemed “problem ballots” by simply navigating via the standard “Windows File Explorer” to the folder named “NotCastImages” which holds ballot scans of “problem ballots”. It may be possible for an administrator of the “ImageCast Central” workstation to view and delete any individual ballot scans from the “NotCastImages” folder by simply using the standard Windows delete and recycle bin functions provided by the Windows 10 Pro operating system. Id. ¶¶ 9-11.

2. Dominion – By Design – Violates Federal Election & Voting Record Retention Requirements.

89. The Dominion System put in place by its own design violates the intent of Federal law on the requirement to preserve and retain records – which clearly requires preservation of all records requisite to voting in such an election.

§ 20701. Retention and preservation of records and papers by officers of elections; deposit with custodian; penalty for violation

Every officer of election shall retain and preserve, for a period of twenty-two months from the date of any general, special, or primary election of which candidates for the office of President, Vice President, presidential elector, Member of the Senate, Member of the House of Representatives, or Resident Commissioner from the Commonwealth of Puerto Rico are voted for, **all records and papers which come into his possession relating to any application, registration, payment of poll tax, or other act requisite to voting in such election**, except that, when required by law, such records and papers may be delivered to another officer of election and except that, if a State or the Commonwealth of Puerto Rico designates a custodian to retain and preserve these records and papers at a specified place, then such records and papers may be deposited with such custodian, and the duty to retain and preserve any record or paper so deposited shall devolve upon such custodian. Any officer of election or custodian who willfully fails to comply with this section shall be fined not more than \$1,000 or imprisoned not more than one year, or both.

See 52 USC § 20701.

3. Dominion Vulnerabilities to Hacking.

90. Plaintiffs have since learned that the “glitches” in the Dominion system -- that have the uniform effect of hurting Trump and helping Biden -- have been widely reported in the press and confirmed by the analysis of independent experts, a partial summary of which is included below.

(1) Users on the ground have full admin privileges to machines and software. The Dominion system is designed to facilitate vulnerability and allow a select few to determine which votes will be counted in any election. Workers were responsible for moving ballot data from polling place to the collector’s office and inputting it into the correct folder. Any anomaly, such as pen drips or bleeds, is not counted and is handed over to a poll worker to analyze and decide if it should count. This creates massive opportunity for improper vote adjudication. (Ex. 106 Watkins aff. ¶¶8 & 11).

(2) Affiant witness (name redacted for security reasons), in his sworn testimony explains he was selected for the national security guard detail of the President of Venezuela, and that he witnessed the creation of Smartmatic for the purpose of election vote manipulation:

I was witness to the creation and operation of a sophisticated electronic voting system that permitted the leaders of the Venezuelan government to manipulate the tabulation of votes for national and local elections and select the winner of those elections in order to gain and maintain their power. Importantly, I was a direct witness to the creation and operation of an electronic voting system in a conspiracy between a company known as Smartmatic and the leaders of conspiracy with the Venezuelan government. This conspiracy specifically involved President Hugo Chavez Frias, the person in charge of the National Electoral Council named Jorge Rodriguez, and principals, representatives, and personnel from Smartmatic which included ... The purpose of this conspiracy was to create and operate a voting system that could change the votes in elections from votes against persons running the Venezuelan government to votes in their favor in order to maintain control of the government. (*Id.* ¶¶6, 9, 10).

91. Specific vulnerabilities of the systems in question that have been well documented or reported include:

A. Barcodes can override the voters’ vote: As one University of California, Berkeley study shows, “In all three of these machines [including

- Dominion Voting Systems] the ballot marking printer is in the same paper path as the mechanism to deposit marked ballots into an attached ballot box. This opens up a very serious security vulnerability: the voting machine can make the paper ballot (to add votes or spoil already-case votes) after the last time the voter sees the paper, and then deposit that marked ballot into the ballot box without the possibility of detection.” (See Ex. 2, Appel Study).
- B. Voting machines were able to be connected to the internet by way of laptops that were obviously internet accessible. If one laptop was connected to the internet, the entire precinct was compromised.
 - C. October 6, 2006 – **Congresswoman Carolyn Maloney calls on Secretary of Treasury Henry Paulson to conduct an investigation into Smartmatic based on its foreign ownership and ties to Venezuela.** (See Ex. 15). Congresswoman Maloney wrote that “It is undisputed that Smartmatic is foreign owned and it has acquired Sequoia ... Smartmatic now acknowledged that Antonio Mugica, a Venezuelan businessman has a controlling interest in Smartmatica, but the company has not revealed who all other Smartmatic owners are. *Id.*
 - D. Dominion “got into trouble” with several subsidiaries it used over alleged cases of fraud. One subsidiary is Smartmatic, a company “that has played a significant role in the U.S. market over the last decade.”⁷ Dominion entered into a 2009 contract with Smartmatic and provided Smartmatic with the PCOS machines (optical scanners) that were used in the 2010 Philippine election, the biggest automated election run by a private company. The automation of that first election in the Philippines was hailed by the international community and by the critics of the automation. The results transmission reached 90% of votes four hours after polls closed and Filipinos knew for the first time who would be their new president on Election Day. In keeping with local Election law requirements, Smartmatic and Dominion were required to provide the source code of the voting machines prior to elections so that it could be independently verified. *Id.*
 - E. Litigation over Smartmatic “glitches” alleges they impacted the 2010 and 2013 mid-term elections in the Philippines, raising questions of cheating and fraud. An independent review of the source codes used in the machines found multiple problems, which concluded, “The software inventory provided by Smartmatic is inadequate, ... which brings into

⁷ *Voting Technology Companies in the U.S. – Their Histories and Present Contributions*, Access Wire, (Aug. 10, 2017), available at: <https://www.accesswire.com/471912/Voting-Technology-Companies-in-the-US--Their-Histories>.

question the software credibility.”⁸

- F. Dominion acquired Sequoia Voting Systems as well as Premier Election Solutions (formerly part of Diebold, which sold Premier to ES&S in 2009, until antitrust issues forced ES&S to sell Premier, which then was acquired by Dominion). This map illustrates 2016 voting machine data—meaning, these data do not reflect geographic aggregation at the time of acquisition, but rather the machines that retain the Sequoia or Premier/Diebold brand that now fall under Dominion’s market share. Penn Wharton Study at 16.
- G. In late December of 2019, three Democrat Senators, Warren, Klobuchar, Wyden and House Member Mark Pocan wrote about their ‘particularized concerns that secretive & “trouble -plagued companies”’ “have long skimmed on security in favor of convenience,” in the context of how they described the voting machine systems that three large vendors – Election Systems & Software, Dominion Voting Systems, & Hart InterCivic – collectively provide voting machines & software that facilitate voting for over 90% of all eligible voters in the U.S.” (See Ex. 16).
- H. Senator Ron Wyden (D-Oregon) said the findings [insecurity of voting systems] are “yet another damning indictment of the profiteering election vendors, who care more about the bottom line than protecting our democracy.” It’s also an indictment, he said, “of the notion that important cybersecurity decisions should be left entirely to county election offices, many of whom do not employ a single cybersecurity specialist.”⁹

92. The House of Representatives passed H.R. 2722 in an attempt to address these very risks on June 27, 2019:

This bill addresses election security through grant programs and requirements for voting systems and paper ballots.

The bill establishes requirements for voting systems, including that systems (1) use individual, durable, voter-verified paper ballots; (2) make

⁸ *Smartmatic-TIM Running Out of Time to Fix Glitches*, ABS-CBN News (May 4, 2010), available at: <https://news.abs-cbn.com/nation/05/04/10/smartmatic-tim-running-out-time-fix-glitches>.

⁹ Kim Zetter, *Exclusive: Critical U.S. Election Systems Have Been Left Exposed Online Despite Official Denials*, VICE (Aug. 8, 2019) (“VICE Election Article”), available at: <https://www.vice.com/en/article/3kxzk9/exclusive-critical-us-election-systems-have-been-left-exposed-online-despite-official-denials>.

a voter's marked ballot available for inspection and verification by the voter before the vote is cast; (3) ensure that individuals with disabilities are given an equivalent opportunity to vote, including with privacy and independence, in a manner that produces a voter-verified paper ballot; (4) be manufactured in the United States; and (5) meet specified cybersecurity requirements, including the prohibition of the connection of a voting system to the internet.

See H.R. 2722.

E. Because Dominion Senior Management Has Publicly Expressed Hostility to Trump and Opposition to His Election, Dominion Is Not Entitled to Any Presumption of Fairness, Objectivity or Impartiality, and Should Instead Be Treated as a Hostile Partisan Political Actor.

93. Dr. Eric Coomer is listed as the co-inventor for several patents on ballot adjudication and voting machine-related technology, all of which were assigned to Dominion.¹⁰ He joined Dominion in 2010, and most recently served as Voting Systems Officer of Strategy and Director of Security for Dominion. Dr. Coomer first joined Sequoia Voting Systems in 2005 as Chief Software Architect and became Vice President of Engineering before Dominion Voting Systems acquired Sequoia. Dr. Coomer's patented ballot adjudication technology into Dominion voting machines sold throughout

¹⁰ See "Patents by Inventor Eric Coomer," *available at*: <https://patents.justia.com/inventor/eric-coomer>. This page lists the following patents issued to Dr. Coomer and his co-inventors: (1) U.S. Patent No. 9,202,113, Ballot Adjudication in Voting Systems Utilizing Ballot Images (issued Dec. 1, 2015); (2) U.S. Patent No. 8,913,787, Ballot Adjudication in Voting Systems Utilizing Ballot Images (issued Dec. 16, 2014); (3) U.S. Patent No. 8,910,865, Ballot Level Security Features for Optical Scan Voting Machine Capable of Ballot Image Processing, Secure Ballot Printing, and Ballot Layout Authentication and Verification (issued Dec. 16, 2014); (4) U.S. Patent No. 8,876,002, Systems for Configuring Voting Machines, Docking Device for Voting Machines, Warehouse Support and Asset Tracking of Voting Machines (issued Nov. 4, 2014); (5) U.S. Patent No. 8,864,026, Ballot Image Processing System and Method for Voting Machines (issued Oct. 21, 2014); (6) U.S. Patent No. 8,714,450, Systems and Methods for Transactional Ballot Processing, and Ballot Auditing (issued May 6, 2014), available at: <https://patents.justia.com/inventor/eric-coomer>.

the United States, including those used in Wisconsin. (See attached hereto Exh 6, Jo Oltmann Aff.).

94. In 2016, Dr. Coomer admitted to the State of Illinois that Dominion Voting machines can be manipulated remotely.¹¹ He has also publicly posted videos explaining how Dominion voting machines can be remotely manipulated. See Id.¹²

95. Dr. Coomer has emerged as Dominion's principal defender, both in litigation alleging that Dominion rigged elections in Georgia and in the media. An examination of his previous public statements has revealed that Dr. Coomer is highly partisan and even more anti-Trump, precisely the opposite of what would expect from the management of a company charged with fairly and impartially counting votes (which is presumably why he tried to scrub his social media history). (See Id.)

96. Unfortunately for Dr. Coomer, however, a number of these posts have been captured for perpetuity. Below are quotes from some of his greatest President Trump and Trump voter hating hits to show proof of motive and opportunity. (See Id.)

If you are planning to vote for that autocratic, narcissistic, fascist ass-hat blowhard and his Christian jihadist VP pic, UNFRIEND ME NOW! No, I'm not joking. ... Only an absolute F[**]KING IDIOT could ever vote for that wind-bag fuck-tard FASCIST RACIST F[**]K! ... I don't give a damn if you're friend, family, or random acquaintance, pull the lever, mark an oval, touch a screen for that carnival barker ... UNFRIEND ME NOW! I have no desire whatsoever to ever interact with you. You are beyond hope, beyond reason. You are controlled by fear, reaction and bullsh[**]t. Get your shit together. F[**]K YOU! Seriously, this f[**]king ass-clown stands

¹¹ Jose Hermosa, *Electoral Fraud: Dominion's Vice President Warned in 2016 That Vote-Counting Systems Are Manipulable*, The BL (Nov. 13, 2020), available at: <https://thebl.com/us-news/electoral-fraud-dominions-vice-president-warned-in-2016-that-vote-counting-systems-are-manipulable.html>.

¹² See, e.g., "Eric Coomer Explains How to Alter Votes in the Dominion Voting System" (Nov. 24, 2020) (excerpt of presentation delivered in Chicago in 2017), available at: <https://www.youtube.com/watch?v=UtB3tLaXLJE>.

against everything that makes this country awesome! You want in on that? You [Trump voters] deserve nothing but contempt. *Id.* (July 21, 2016 Facebook post).¹³

97. In a rare moment of perhaps unintentional honesty, Dr. Coomer anticipates this Complaint and many others, by slandering those seeking to hold election riggers like Dominion to account and to prevent the United States' descent into Venezuelan levels of voting fraud and corruption out of which Dominion was born:

Excerpts in stunning Trump-supporter logic, "I know there is a lot of voter fraud. I don't know who is doing it, or how much is happening, but I know it is going on a lot." This beautiful statement was followed by, "It happens in third world countries, this the US, we can't let it happen here." *Id.* (October 29, 2016 Facebook post); (See also Exh. 6)

1. Dr. Coomer, who invented the technology for Dominion's voting fraud and has publicly explained how it can be used to alter votes, seems to be extremely hostile to those who would attempt to stop it and uphold the integrity of elections that underpins the legitimacy of the United States government:

And in other news... There be some serious fuckery going on right here fueled by our Cheeto-in-Chief stoking lie after lie on the flames of [Kris] Kobach... [Linking Washington Post article discussing the Presidential Advisory Commission on Election Integrity, of which former Kansas Secretary of State Kris Kobach was a member, entitled, "The voting commission is a fraud itself. Shut it down."] *Id.* (September 14, 2017 Facebook post.) (Id.)

98. Dr. Coomer also keeps good company, supporting and reposting ANTIFA statements slandering President Trump as a "fascist" and by extension his supporters, voters and the United States military (which he claims, without evidence, Trump will make into a "fascist tool"). *Id.* (June 2, 2020 Facebook post). Lest someone claims that these

¹³ In this and other quotations from Dr. Coomer's social media, Plaintiffs have redacted certain profane terms.

are “isolated statements” “taken out of context”, Dr. Coomer has affirmed that he shares ANTIFA’s taste in music and hatred of the United States of America, *id.* (May 31, 2020 Facebook post linking “F[**]k the USA” by the exploited), and the police. *Id.* (separate May 31, 2020 Facebook posts linking N.W.A. “F[**]k the Police” and a post promoting phrase “Dead Cops”). *Id.* at 4-5.

99. Affiant and journalist Joseph Oltmann researched ANTIFA in Colorado. *Id.* at 1. “On or about the week of September 27, 2020,” he attended an Antifa meeting which appeared to be between Antifa members in Colorado Springs and Denver Colorado,” where Dr. Coomer was present. In response to a question as to what Antifa would do “if Trump wins this ... election?”, Dr. Coomer responded “Don’t worry about the election. Trump is not going to win. I made f[**]king sure of that ... Hahaha.” *Id.* at 2.

100. By putting an anti-Trump zealot like Dr. Coomer in charge of election “Security,” and using his technology for what should be impartial “ballot adjudication,” Dominion has given the fox the keys to the hen house ***and has forfeited any presumption of objectivity, fairness, or even propriety.*** It appears that Dominion does not care about even an appearance of impropriety, as its most important officer has his fingerprints all over a highly partisan, vindictive, and personal vendetta against the Republican nominee both in 2016 and 2020, President Donald Trump. Dr. Coomer’s highly partisan anti-Trump rages show clear motive on the part of Dominion to rig the election in favor of Biden, and may well explain why for each of the so-called “glitches” uncovered, it is always Biden receiving the most votes on the favorable end of such a “glitch.” (Id.)

101. In sum, as set forth above, for a host of independent reasons, the Wisconsin election results concluding that Joe Biden received 20,608 more votes than President

Donald Trump must be set aside.

COUNT I

Defendants Violated the Elections and Electors Clauses and 42 U.S.C. § 1983.

102. Plaintiffs reallege all preceding paragraphs as if fully set forth herein.

103. The Electors Clause states that “[e]ach State shall appoint, in such Manner as the Legislature thereof may direct, a Number of Electors” for President. U.S. Const. art. II, §1, cl. 2 (emphasis added). Likewise, the Elections Clause of the U.S. Constitution states that “[t]he Times, Places, and Manner of holding Elections for Senators and Representatives, shall be prescribed in each State by *the Legislature* thereof.” U.S. Const. art. I, § 4, cl. 1 (emphasis added).

104. The Legislature is ““the representative body which ma[kes] the laws of the people.”” *Smiley v. Holm*, 285 U.S. 355, 365 (1932). Regulations of congressional and presidential elections, thus, “must be in accordance with the method which the state has prescribed for legislative enactments.” *Id.* at 367; *see also Ariz. State Legislature v. Ariz. Indep. Redistricting Comm’n*, 135 S. Ct. 2652, 2668 (2015).

105. Defendants are not part of the Wisconsin Legislature and cannot exercise legislative power. Because the United States Constitution reserves for the Wisconsin Legislature the power to set the time, place, and manner of holding elections for the President and Congress, county boards of elections and state executive officers have no authority to unilaterally exercise that power, much less to hold them in ways that conflict with existing legislation.

106. Section I details three separate instances where Defendants violated the Wisconsin Election Code. First, the WEC May 23, 2020 “guidance”, see Ex. 16, on the treatment of “indefinitely confined” voters, who are exempt from Wisconsin’s photo ID

requirement for absentee ballot application, that directly contravened the express requirement in Wisconsin Election Code that clerks “shall” remove an allegedly “indefinitely confined” voter if the clerk has “reliable information” that that voter is not, or is no longer, “indefinitely confined.” Second, the WEC’s October 18, 2016, see Ex. 18, directed clerks to violate the express requirements of Wisconsin Statutes § 6.87(6)(d), which states “[i]f a certificate is missing the address of a witness the ballot may not be counted,” when it directed clerks to fill in missing information on absentee ballot envelopes. Third, WEC and Wisconsin election officials violated Wisconsin Election Code, or acted *ultra vires*, insofar as they filled in missing witness or voter information on absentee ballots and permitted voters to cure ballots without statutory authorization. Section II provides expert witness testimony quantifying the number of illegal or ineligible ballots that were counted, and lawful ballots that were not, as a result of these and Defendants’ other violations.

107. A report from Dr. William Briggs, shows that there were approximately 29,594 absentee ballots listed as “unreturned” by voters that either never requested them, or that requested and returned their ballots.

108. Evidence compiled by Matt Braynard using the National Change of Address (“NCOA”) Database shows that 6,207 Wisconsin voters in the 2020 General Election moved out-of-state prior to voting, and therefore were ineligible. Mr. Braynard also identified 765 Wisconsin voters who subsequently registered to vote in another state and were therefore ineligible to vote in the 2020 General Election. The merged number is 6,966 ineligible voters whose votes must be removed from the total for the 2020 General Election.

109. Plaintiffs have no adequate remedy at law and will suffer serious and irreparable

harm unless the injunctive relief requested herein is granted. Defendants have acted and, unless enjoined, will act under color of state law to violate the Elections Clause.

110. Accordingly, the results for President in the November 3, 2020 election must be set aside, the State of Wisconsin should be enjoined from transmitting the certified the results thereof, and this Court should grant the other declaratory and injunctive relief requested herein.

COUNT II

Governor Evers and Other Defendants Violated The Equal Protection Clause of the Fourteenth Amendment U.S. Const. Amend. XIV & 42 U.S.C. § 1983

Invalid Enactment of Regulations & Disparate Treatment of Absentee vs. Mail-In Ballots

111. Plaintiffs refer to and incorporate by reference each of the prior paragraphs of this Complaint as though the same were repeated at length herein.

112. The Fourteenth Amendment of the United States Constitution provides “nor shall any state deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws. *See also Bush v. Gore*, 531 U.S. 98, 104 (2000) (having once granted the right to vote on equal terms, the State may not, by later arbitrary and disparate treatment, value one person’s vote over the value of another’s). *Harper v. Va. Bd. of Elections*, 383 U.S. 663, 665 (1966) (“Once the franchise is granted to the electorate, lines may not be drawn which are inconsistent with the Equal Protection Clause of the Fourteenth Amendment.”). The Court has held that to ensure equal protection, a problem inheres in the absence of specific standards to ensure its equal application. *Bush*, 531 U.S. at 106 (“The formulation of uniform rules to determine intent based on these recurring circumstances is practicable and, we conclude,

necessary.”).

113. The equal enforcement of election laws is necessary to preserve our most basic and fundamental rights. The requirement of equal protection is particularly stringently enforced as to laws that affect the exercise of fundamental rights, including the right to vote.

114. The disparate treatment of Wisconsin voters, in subjecting one class of voters to greater burdens or scrutiny than another, violates Equal Protection guarantees because “the right of suffrage can be denied by a debasement or dilution of the weight of a citizen’s vote just as effectively as by wholly prohibiting the free exercise of the franchise.” *Reynolds*, 377 U.S. at 555. *Rice v. McAlister*, 268 Ore. 125, 128, 519 P.2d 1263, 1265 (1975); *Heitman v. Brown Grp., Inc.*, 638 S.W.2d 316, 319, 1982 Mo. App. LEXIS 3159, at *4 (Mo. Ct. App. 1982); *Prince v. Bear River Mut. Ins. Co.*, 2002 UT 68, ¶ 41, 56 P.3d 524, 536-37 (Utah 2002).

115. In statewide and federal elections conducted in the State of Wisconsin, including without limitation the November 3, 2020 General Election, all candidates, political parties, and voters, including without limitation Plaintiffs, in having the election laws enforced fairly and uniformly.

116. As set forth in Section I above, Defendants failed to comply with the requirements of the Wisconsin Election Code and thereby diluted the lawful ballots of the Plaintiffs and of other Wisconsin voters and electors in violation of the United States Constitution guarantee of Equal Protection. Further, Defendants enacted regulations, or issued guidance, that had the intent and effect of favoring one class of voters – Democratic absentee voters – over Republican voters. Further, all of these invalidly enacted rules by Defendant Wisconsin executive and administrative agencies, had the intent and effect of

eliminating protections against voter fraud, and thereby enabled and facilitated the counting of fraudulent, unlawful and ineligible votes, which were quantified in Section II. Finally, Section III details the additional voting fraud and manipulation enabled by the use Dominion voting machines, which had the intent and effect of favoring Biden and Democratic voters and discriminating against Trump and Republican voters.

117. Defendants have acted and will continue to act under color of state law to violate Plaintiffs' right to be present and have actual observation and access to the electoral process as secured by the Equal Protection Clause of the United States Constitution. Defendants thus failed to conduct the general election in a uniform manner as required by the Equal Protection Clause of the Fourteenth Amendment, the corollary provisions of the Wisconsin Constitution, and the Wisconsin Election Code.

118. Plaintiffs seek declaratory and injunctive relief forbidding Defendants from certifying a tally that includes any ballots that were not legally cast, or that were switched from Trump to Biden through the unlawful use of Dominion Democracy Suite software and devices.

119. The Briggs analysis identified two specific errors involving unreturned mail-in ballots that are indicative of voter fraud, namely: “**Error #1:** those who were recorded as receiving absentee ballots *without* requesting them;” and “**Error #2:** those who returned absentee ballots but whose votes went missing (*i.e.*, marked as unreturned).” Clearly the dilution of lawful votes violates the Equal Protection clause; and the counting of unlawful votes violates the rights of lawful Citizens.

120. In addition, Plaintiffs ask this Court to order that no ballot processed by a counting board in the Wisconsin Counties can be included in the final vote tally unless a challenger

was allowed to meaningfully observe the process and handling and counting of the ballot, or that were unlawfully switched from Trump to Biden.

121. Plaintiffs have no adequate remedy at law and will suffer serious and irreparable harm unless the declaratory and injunctive relief requested herein is granted. Indeed, the setting aside of an election in which the people have chosen their representative is a drastic remedy that should not be undertaken lightly, but instead should be reserved for cases in which a person challenging an election has clearly established a violation of election procedures and has demonstrated that the violation has placed the result of the election in doubt. Wisconsin law allows elections to be contested through litigation, both as a check on the integrity of the election process and as a means of ensuring the fundamental right of citizens to vote and to have their votes counted accurately.

COUNT III

Fourteenth Amendment, Amend. XIV & 42 U.S.C. § 1983

Denial of Due Process On The Right to Vote

122. Plaintiffs refer to and incorporate by reference each of the prior paragraphs of this Complaint as though the same were repeated at length herein.

123. The right of qualified citizens to vote in a state election involving federal candidates is recognized as a fundamental right under the Fourteenth Amendment of the United States Constitution. *Harper*, 383 U.S. at 665. *See also Reynolds*, 377 U.S. at 554 (The Fourteenth Amendment protects the “the right of all qualified citizens to vote, in state as well as in federal elections.”). Indeed, ever since the *Slaughter-House Cases*, 83 U.S. 36 (1873), the United States Supreme Court has held that the Privileges or Immunities Clause of the Fourteenth Amendment protects certain rights of federal

citizenship from state interference, including the right of citizens to directly elect members of Congress. *See Twining v. New Jersey*, 211 U.S. 78, 97 (1908) (citing *Ex parte Yarbrough*, 110 U.S. 651, 663-64 (1884)). *See also Oregon v. Mitchell*, 400 U.S. 112, 148-49 (1970) (Douglas, J., concurring) (collecting cases).

124. The fundamental right to vote protected by the Fourteenth Amendment is cherished in our nation because it “is preservative of other basic civil and political rights.” *Reynolds*, 377 U.S. at 562. Voters have a “right to cast a ballot in an election free from the taint of intimidation and fraud,” *Burson v. Freeman*, 504 U.S. 191, 211 (1992), and “[c]onfidence in the integrity of our electoral processes is essential to the functioning of our participatory democracy.” *Purcell v. Gonzalez*, 549 U.S. 1, 4 (2006) (per curiam).

125. “Obviously included within the right to [vote], secured by the Constitution, is the right of qualified voters within a state to cast their ballots and have them counted” if they are validly cast. *United States v. Classic*, 313 U.S. 299, 315 (1941). “[T]he right to have the vote counted” means counted “at full value without dilution or discount.” *Reynolds*, 377 U.S. at 555, n.29 (quoting *South v. Peters*, 339 U.S. 276, 279 (1950) (Douglas, J., dissenting)).

126. “Every voter in a federal . . . election, whether he votes for a candidate with little chance of winning or for one with little chance of losing, has a right under the Constitution to have his vote fairly counted, without its being distorted by fraudulently cast votes.” *Anderson v. United States*, 417 U.S. 211, 227 (1974); *see also Baker v. Carr*, 369 U.S. 186, 208 (1962). Invalid or fraudulent votes “debase[]” and “dilute” the weight of each validly cast vote. *See Anderson*, 417 U.S. at 227.

127. The right to vote includes not just the right to cast a ballot, but also the right to have it

fairly counted if it is legally cast. The right to vote is infringed if a vote is cancelled or diluted by a fraudulent or illegal vote, including without limitation when a single person votes multiple times. The Supreme Court of the United States has made this clear in case after case. *See, e.g., Gray v. Sanders*, 372 U.S. 368, 380 (1963) (every vote must be “protected from the diluting effect of illegal ballots.”); *Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 196 (2008) (plurality op. of Stevens, J.) (“There is no question about the legitimacy or importance of the State’s interest in counting only the votes of eligible voters.”); *accord Reynolds v. Sims*, 377 U.S. 533, 554-55 & n.29 (1964).

128. The right to an honest [count] is a right possessed by each voting elector, and to the extent that the importance of his vote is nullified, wholly or in part, he has been injured in the free exercise of a right or privilege secured to him by the laws and Constitution of the United States.” *Anderson*, 417 U.S. at 226 (*quoting Prichard v. United States*, 181 F.2d 326, 331 (6th Cir.), *aff’d due to absence of quorum*, 339 U.S. 974 (1950)).

129. Practices that promote the casting of illegal or unreliable ballots or fail to contain basic minimum guarantees against such conduct, can violate the Fourteenth Amendment by leading to the dilution of validly cast ballots. *See Reynolds*, 377 U.S. at 555 (“[T]he right of suffrage can be denied by a debasement or dilution of the weight of a citizen’s vote just as effectively as by wholly prohibiting the free exercise of the franchise.”).

130. Section I details the Defendants violations of the Wisconsin Election Code. Section II provides estimates of the number of fraudulent, illegal or ineligible votes counted, and demonstrates that this number is many times larger than Biden’s margin of victory.

131. Plaintiffs seek declaratory and injunctive relief enjoining Defendants from

certifying the results of the General Election, or in the alternative, conduct a recount or recanvass in which they allow a reasonable number of challengers to meaningfully observe the conduct of the Wisconsin Board of State Canvassers and the Wisconsin county Boards of Canvassers and that these canvassing boards exercise their duty and authority under Wisconsin law, which forbids certifying a tally that includes any ballots that were not legally cast, or that were switched from Trump to Biden through the unlawful use of Dominion Democracy Suite software and devices.

COUNT IV

Wide-Spread Ballot Fraud

132. Plaintiffs reallege all preceding paragraphs as if fully set forth herein.

133. The scheme of civil fraud can be shown with the pattern of conduct that includes motive and opportunity, as exhibited by the high level official at Dominion Voting Systems, Eric Coomer, and his visceral and public rage against the current U.S. President.

134. Opportunity appears with the secretive nature of the voting source code, and the feed of votes that make clear that an algorithm is applied, that reports in decimal points despite the law requiring one vote for one ballot.

135. The results of the analysis and the pattern seen in the included graph strongly suggest a systemic, system-wide algorithm was enacted by an outside agent, causing the results of Wisconsin's vote tallies to be inflated by somewhere between 3 and 5.6 percentage points. Statistical estimating yields that in Wisconsin, the best estimate of the number of impacted votes is 181,440. *Id.*

136. The Reports cited above show a total amount of illegal votes identified that amount to 318,012 or over 15 times the margin by which candidate Biden leads President Trump in the state

of Wisconsin.

137. The right to vote includes not just the right to cast a ballot, but also the right to have it fairly counted if it is legally cast. The right to vote is infringed if a vote is cancelled or diluted by a fraudulent or illegal vote, including without limitation when a single person votes multiple times. The Supreme Court of the United States has made this clear in case after case. See, e.g., *Gray v. Sanders*, 372 U.S. 368, 380 (1963) (every vote must be “protected from the diluting effect of illegal ballots.”); *Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 196 (2008) (plurality op. of Stevens, J.) (“There is no question about the legitimacy or importance of the State’s interest in counting only the votes of eligible voters.”); *accord Reynolds v. Sims*, 377 U.S. 533, 554-55 & n.29 (1964).

138. Plaintiffs have no adequate remedy at law. Plaintiffs contest the results of Wisconsin’s 2020 General Election because it is fundamentally corrupted by fraud. Defendants intentionally violated multiple provisions of the Wisconsin Election Code to elect Biden and other Democratic candidates and defeat President Trump and other Republican candidates.

PRAYER FOR RELIEF

139. Accordingly, Plaintiffs seek an emergency order instructing Defendants to de-certify the results of the General Election for the Office of President.

140. Alternatively, Plaintiffs seek an order instructing the Defendants to certify the results of the General Election for Office of the President in favor of President Donald Trump.

141. In the alternative, Plaintiffs seek an emergency order prohibiting Defendants from including in any certified results from the General Election the tabulation of absentee and mailing ballots which do not comply with the Wisconsin Election Code, including, without limitation, the tabulation of absentee and mail-in ballots Trump Campaign’s watchers were prevented from

observing or based on the tabulation of invalidly cast absentee and mail-in ballots which (i) lack a secrecy envelope, or contain on that envelope any text, mark, or symbol which reveals the elector's identity, political affiliation, or candidate preference, (ii) do not include on the outside envelope a completed declaration that is dated and signed by the elector, (iii) are delivered in-person by third parties for non-disabled voters, or (iv) any of the other Wisconsin Election Code violations set forth in Section II of this Complaint.

142. Order production of all registration data, ballot applications, ballots, envelopes, etc. required to be maintained by law. When we consider the harm of these uncounted votes, and ballots not ordered by the voters themselves, and the potential that many of these unordered ballots may in fact have been improperly voted and also prevented proper voting at the polls, the mail ballot system has clearly failed in the state of Wisconsin and did so on a large scale and widespread basis. The size of the voting failures, whether accidental or intentional, are multiples larger than the margin in the state. For these reasons, Wisconsin cannot reasonably rely on the results of the mail vote. Relief sought is the elimination of the mail ballots from counting in the 2020 election. Alternatively, the electors for the State of Wisconsin should be disqualified from counting toward the 2020 election. Alternatively, the electors of the State of Wisconsin should be directed to vote for President Donald Trump.

143. For these reasons, Plaintiffs ask this Court to enter a judgment in their favor and provide the following emergency relief:

1. An order directing Governor Evers and the Wisconsin Elections Commission to de-certify the election results;

2. An order enjoining Governor Evers from transmitting the currently certified election results the Electoral College;
3. An order requiring Governor Evers to transmit certified election results that state that President Donald Trump is the winner of the election;
4. An immediate emergency order to seize and impound all servers, software, voting machines, tabulators, printers, portable media, logs, ballot applications, ballot return envelopes, ballot images, paper ballots, and all “election materials” referenced in Wisconsin Statutes § 9.01(1)(b)11. related to the November 3, 2020 Wisconsin election for forensic audit and inspection by the Plaintiffs;
5. An order that no votes received or tabulated by machines that were not certified as required by federal and state law be counted;
6. A declaratory judgment declaring that Wisconsin’s failed system of signature verification violates the Electors and Elections Clause by working a de facto abolition of the signature verification requirement;
7. A declaratory judgment declaring that currently certified election results violate the Due Process Clause, U.S. CONST. Amend. XIV;
8. A declaratory judgment declaring that mail-in and absentee ballot fraud must be remedied with a Full Manual Recount or statistically valid sampling that properly verifies the signatures on absentee ballot envelopes and that

invalidates the certified results if the recount or sampling analysis shows a sufficient number of ineligible absentee ballots were counted;

9. A declaratory judgment declaring absentee ballot fraud occurred in violation of Constitutional rights, Election laws and under state law;
10. A permanent injunction prohibiting the Governor and Secretary of State from transmitting the currently certified results to the Electoral College based on the overwhelming evidence of election tampering;
11. Immediate production of 48 hours of security camera recording of all rooms used in the voting process at the TCF Center for November 3, 2020 and November 4, 2020.
12. Plaintiffs further request the Court grant such other relief as is just and proper, including but not limited to, the costs of this action and their reasonable attorney fees and expenses pursuant to 42 U.S.C. 1988.

Respectfully submitted, this 1st day of December, 2020.

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DECLARATION OF [REDACTED]

I, [REDACTED], hereby state the following:

1. [REDACTED]
[REDACTED]
[REDACTED]
2. I am an adult of sound mind. All statements in this declaration are based on my personal knowledge and are true and correct.
3. I am making this statement voluntarily and on my own initiative. I have not been promised, nor do I expect to receive, anything in exchange for my testimony and giving this statement. I have no expectation of any profit or reward and understand that there are those who may seek to harm me for what I say in this statement. I have not participated in any political process in the United States, have not supported any candidate for office in the United States, am not legally permitted to vote in the United States, and have never attempted to vote in the United States.
4. I want to alert the public and let the world know the truth about the corruption, manipulation, and lies being committed by a conspiracy of people and companies intent upon betraying the honest people of the United States and their legally constituted institutions and fundamental rights as citizens. This conspiracy began more than a decade ago in Venezuela and has spread to countries all over the world. It is a conspiracy to wrongfully gain and keep power and wealth. It involves political leaders, powerful companies, and other persons whose purpose is to gain and keep power by changing the free will of the people and subverting the proper course of governing.
5. [REDACTED]
[REDACTED] Over the course of my career, I specialized in the marines [REDACTED]
[REDACTED]
[REDACTED]
6. Due to my training in special operations and my extensive military and academic formations, I was selected for the national security guard detail of the President of Venezuela. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

7. [REDACTED]

[REDACTED] Señor Cabello was a long-time confederate of President Chavez and instrumental in his gaining power. In 2002, Señor Cabello had very briefly taken over the duties of the presidency while Hugo Chavez was imprisoned. Within hours of Señor Cabello taking over the presidency, Hugo Chavez was released from prison and regained the office of President. On December 11, 2011, Cabello was installed as the Vice-President of the United Socialist Party – the party of President Chávez and became the second most powerful figure in the party after Hugo Chávez. Cabello was appointed president of the National Assembly in early 2012 and was re-elected to that post in January 2013. After Hugo Chávez's death, Cabello was next in line for the presidency of the country, but he remained president of the National Assembly and yielded to Nicolás Maduro holding the position of President of Venezuela.

8. [REDACTED]

[REDACTED] President Chavez was very precise and exacting in his instructions in the details about meetings he wanted, where the meeting was to occur, who was to attend, what was to be done. [REDACTED]

[REDACTED]

9. [REDACTED] I was witness to the creation and operation of a

sophisticated electronic voting system that permitted the leaders of the Venezuelan government to manipulate the tabulation of votes for national and local elections and select the winner of those elections in order to gain and maintain their power.

10. Importantly, I was a direct witness to the creation and operation of an electronic voting system in a conspiracy between a company known as Smartmatic and the leaders of conspiracy with the Venezuelan government. This conspiracy specifically involved President Hugo Chavez Frias, the person in charge of the National Electoral Council named Jorge Rodriguez, and principals, representatives, and personnel from Smartmatic which included [REDACTED]. The purpose of this conspiracy was to create and operate a voting system that could change the votes in elections from votes *against* persons running the Venezuelan government to votes *in their favor* in order to maintain control of the government.
11. In mid-February of 2009, there was a national referendum to change the Constitution of Venezuela to end term limits for elected officials, including the President of Venezuela. The referendum passed. This permitted Hugo Chavez to be re-elected an unlimited number of times.
12. After passage of the referendum, President Chavez instructed me to make arrangements for him to meet with Jorge Rodriguez, then President of the National Electoral Council, and three executives from Smartmatic. Among the three Smartmatic representatives were [REDACTED]
[REDACTED] President Chavez had multiple meetings with Rodriguez and the Smartmatic team at which I was present. In the first of four meetings, Jorge Rodriguez promoted the idea to create software that would manipulate elections. Chavez was very excited and made it clear that he would provide whatever Smartmatic needed. He wanted them immediately to create a voting system which would ensure that any time anything was going to be voted on the voting system would guarantee results that Chavez wanted. Chavez offered Smartmatic many inducements, including large sums of money, for Smartmatic to create or modify the voting system so that it would guarantee Chavez would win every election cycle. Smartmatic's team agreed to create such a system and did so.
13. I arranged and attended three more meetings between President Chavez and the representatives from Smartmatic at which details of the new

voting system were discussed and agreed upon. For each of these meetings, I communicated directly with [REDACTED] on details of where and when to meet, where the participants would be picked up and delivered to the meetings, and what was to be accomplished. At these meetings, the participants called their project the “Chavez revolution.” From that point on, Chavez never lost any election. In fact, he was able to ensure wins for himself, his party, Congress persons and mayors from townships.

14. Smartmatic’s electoral technology was called “Sistema de Gestión Electoral” (the “Electoral Management System”). Smartmatic was a pioneer in this area of computing systems. Their system provided for transmission of voting data over the internet to a computerized central tabulating center. The voting machines themselves had a digital display, fingerprint recognition feature to identify the voter, and printed out the voter’s ballot. The voter’s thumbprint was linked to a computerized record of that voter’s identity. Smartmatic created and operated the entire system.
15. Chavez was most insistent that Smartmatic design the system in a way that the system could change the vote of each voter without being detected. He wanted the software itself to function in such a manner that if the voter were to place their thumb print or fingerprint on a scanner, then the thumbprint would be tied to a record of the voter’s name and identity as having voted, but that voter would not tracked to the changed vote. He made it clear that the system would have to be setup to not leave any evidence of the changed vote for a specific voter and that there would be no evidence to show and nothing to contradict that the name or the fingerprint or thumb print was going with a changed vote. Smartmatic agreed to create such a system and produced the software and hardware that accomplished that result for President Chavez.
16. After the Smartmatic Electoral Management System was put in place, I closely observed several elections where the results were manipulated using Smartmatic software. One such election was in December 2006 when Chavez was running against Rosales. Chavez won with a landslide over Manuel Rosales - a margin of nearly 6 million votes for Chavez versus 3.7 million for Rosales.
17. On April 14, 2013, I witnessed another Venezuelan national election in which the Smartmatic Electoral Management System was used to manipulate and change the results for the person to succeed Hugo Chávez

as President. In that election, Nicolás Maduro ran against Capriles Radonsky. [REDACTED]

[REDACTED] Inside that location was a control room in which there were multiple digital display screens – TV screens – for results of voting in each state in Venezuela. The actual voting results were fed into that room and onto the displays over an internet feed, which was connected to a sophisticated computer system created by Smartmatic. People in that room were able to see in “real time” whether the vote that came through the electronic voting system was in their favor or against them. If one looked at any particular screen, they could determine that the vote from any specific area or as a national total was going against either candidate. Persons controlling the vote tabulation computer had the ability to change the reporting of votes by moving votes from one candidate to another by using the Smartmatic software.

18. By two o'clock in the afternoon on that election day Capriles Radonsky was ahead of Nicolás Maduro by two million votes. When Maduro and his supporters realized the size of Radonsky's lead they were worried that they were in a crisis mode and would lose the election. The Smartmatic machines used for voting in each state were connected to the internet and reported their information over the internet to the Caracas control center in real-time. So, the decision was made to reset the entire system. Maduro's and his supporters ordered the network controllers to take the internet itself offline in practically all parts in Venezuela and to change the results.
19. It took the voting system operators approximately two hours to make the adjustments in the vote from Radonsky to Maduro. Then, when they turned the internet back on and the on-line reporting was up and running again, they checked each screen state by state to be certain where they could see that each vote was changed in favor of Nicholas Maduro. At that moment the Smartmatic system changed votes that were for Capriles Radonsky to Maduro. By the time the system operators finish, they had achieved a convincing, but narrow victory of 200,000 votes for Maduro.
20. After Smartmatic created the voting system President Chavez wanted, he exported the software and system all over Latin America. It was sent to Bolivia, Nicaragua, Argentina, Ecuador, and Chile – countries that were in alliance with President Chavez. This was a group of leaders who wanted to be able to guarantee they maintained power in their countries. When Chavez died, Smartmatic was in a position of being the only

company that could guarantee results in Venezuelan elections for the party in power.

21. I want to point out that the software and fundamental design of the electronic electoral system and software of Dominion and other election tabulating companies relies upon software that is a descendant of the Smartmatic Electoral Management System. In short, the Smartmatic software is in the DNA of every vote tabulating company's software and system.
22. Dominion is one of three major companies that tabulates votes in the United States. Dominion uses the same methods and fundamentally same software design for the storage, transfer and computation of voter identification data and voting data. Dominion and Smartmatic did business together. The software, hardware and system have the same fundamental flaws which allow multiple opportunities to corrupt the data and mask the process in a way that the average person cannot detect any fraud or manipulation. The fact that the voting machine displays a voting result that the voter intends and then prints out a paper ballot which reflects that change does not matter. It is the software that counts the digitized vote and reports the results. The software itself is the one that changes the information electronically to the result that the operator of the software and vote counting system intends to produce that counts. That's how it is done. So the software, the software itself configures the vote and voting result -- changing the selection made by the voter. The software decides the result regardless of what the voter votes.
23. All of the computer controlled voting tabulation is done in a closed environment so that the voter and any observer cannot detect what is taking place unless there is a malfunction or other event which causes the observer to question the process. I saw first-hand that the manipulation and changing of votes can be done in real-time at the secret counting center which existed in Caracas, Venezuela. For me it was something very surprising and disturbing. I was in awe because I had never been present to actually see it occur and I saw it happen. So, I learned first-hand that it doesn't matter what the voter decides or what the paper ballot says. It's the software operator and the software that decides what counts -- not the voter.
24. If one questions the reliability of my observations, they only have to read the words of [REDACTED] [REDACTED]
[REDACTED] a time period in

I declare under penalty of perjury that the foregoing is true and correct and that this Declaration was prepared in Dallas County, State of Texas, and executed on November 15, 2020.

[Faint, illegible text, likely a signature or stamp]

An Analysis of Surveys Regarding Absentee Ballots Across Several States

William M. Briggs

November 23, 2020

1 Summary

Survey data was collected from individuals in several states, sampling those who the states listed as not returning absentee ballots. The data was provided by Matt Braynard.

The survey asked respondents whether they (a) had ever requested an absentee ballot, and, if so, (b) whether they had in fact returned this ballot. From this sample I produce predictions of the total numbers of: **Error #1**, those who were recorded as receiving absentee ballots *without* requesting them; and **Error #2**, those who returned absentee ballots but whose votes went missing (i.e. marked as unreturned).

The sizes of both errors were large in each state. The states were Georgia, Michigan, Wisconsin, and Arizona where ballots were across parties. Pennsylvania data was for Republicans only.

2 Analysis Description

Each analysis was carried out separately for each state. The analysis used (a) the number of absentee ballots recorded as unreturned, (b) the total responding to the survey, (c) the total of those saying they did not request a ballot, (d) the total of those saying they did request a ballot, and of these (e) the number saying they returned their ballots. I assume survey respondents are representative and the data is accurate.

From these data a simple parameter-free predictive model was used to calculate the probability of all possible outcomes. Pictures of these probabilities were derived, and the 95% prediction interval of the relevant numbers was calculated. The pictures appear in the Appendix at the end. They are summarized here with their 95% prediction intervals.

Error #1: being recorded as sent an absentee ballot without requesting one.

Error #2: sending back an absentee ballot and having it recorded as not returned.

| State | Unreturned ballots | Error #1 | Error #2 |
|---------------|--------------------|-----------------|---------------|
| Georgia | 138,029 | 16,938–22,771 | 31,559–38,866 |
| Michigan | 139,190 | 29,611–36,529 | 27,928–34,710 |
| Pennsylvania* | 165,412 | 32,414–37,444 | 26,954–31,643 |
| Wisconsin | 96,771 | 16,316–19,273 | 13,991–16,757 |
| Arizona | 518,560 | 208,333–229,937 | 78,714–94,975 |

*Number for Pennsylvania represent Republican ballots only.

Ballots that were not requested, and ballots returned and marked as not returned were classed as *troublesome*. The estimated average number of troublesome ballots for each state were then calculated using the table above and are presented next.

| State | Unreturned ballots | Estimated average troublesome ballots | Percent |
|---------------|--------------------|--|---------|
| Georgia | 138,029 | 53,489 | 39% |
| Michigan | 139,190 | 62,517 | 45% |
| Pennsylvania* | 165,412 | 61,780 | 37% |
| Wisconsin | 96,771 | 29,594 | 31% |
| Arizona | 518,560 | 303,305 | 58% |

*Number for Pennsylvania represent Republican ballots only.

3 Conclusion

There are clearly a large number of troublesome ballots in each state investigated. Ballots marked as not returned that were never requested are clearly an error of some kind. The error is not small as a percent of the total recorded unreturned ballots.

Ballots sent back and unrecorded is a separate error. These represent votes that have gone missing, a serious mistake. The number of these missing ballots is also large in each state.

Survey respondents were not asked if they received an unrequested ballot whether they sent these ballots back. This is clearly a lively possibility, and represents a third possible source of error, including the potential of voting twice (once by absentee and once at the polls). No estimates or likelihood can be calculated for this potential error due to absence of data.

4 Declaration of William M. Briggs, PhD

1. My name is William M. Briggs. I am over 18 years of age and am competent to testify in this action. All of the facts stated herein are true and based on my personal knowledge.
2. I received a Ph.D of Statistics from Cornell University in 2004.
3. I am currently a statistical consultant. I make this declaration in my personal capacity.
4. I have analyzed data regarding responses to questions relating to mail ballot requests, returns and related issues.
5. I attest to a reasonable degree of professional certainty that the resulting analysis are accurate.

I declare under the penalty of perjury that the foregoing is true and correct.



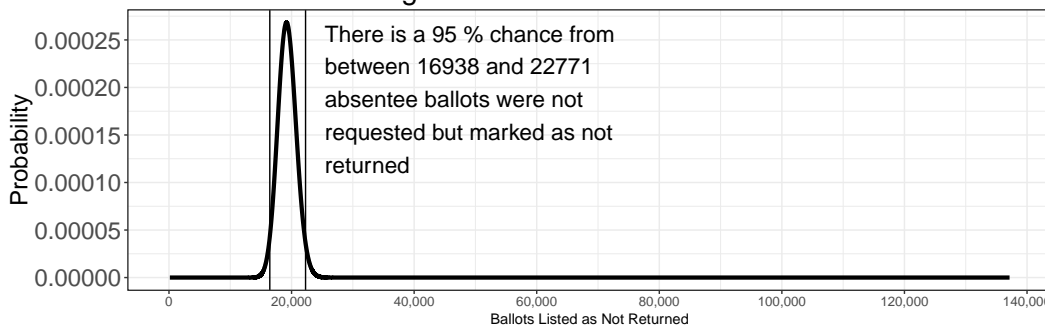
23 November 2020

William M. Briggs

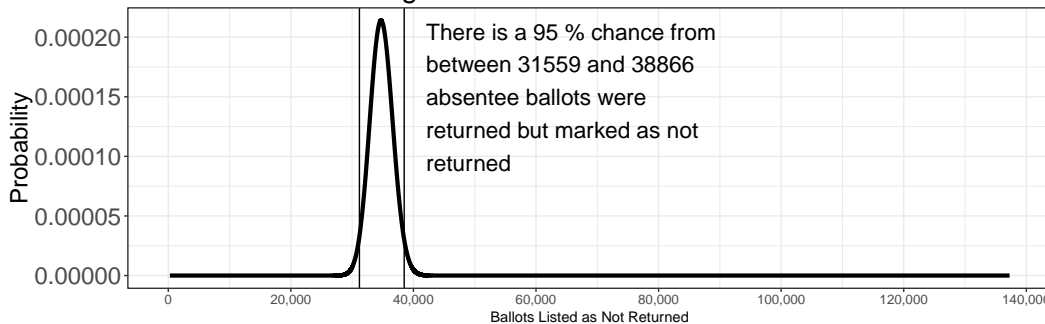
5 Appendix

The probability pictures for each state for each outcome as mentioned above.

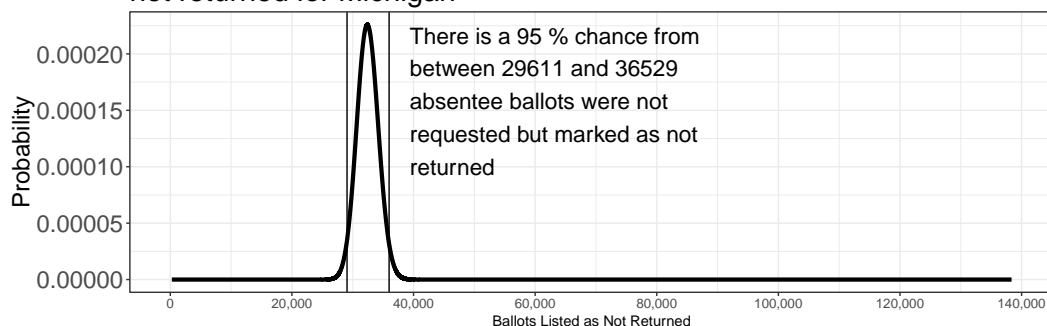
Probability of numbers of un-requested absentee ballots listed as not returned for Georgia



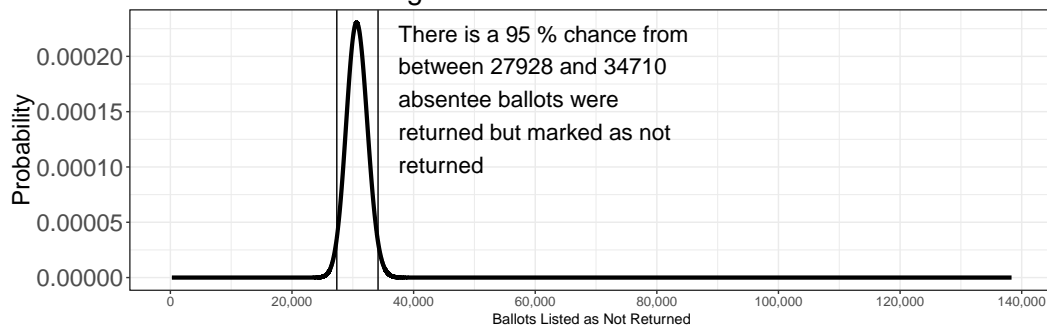
Probability of numbers of absentee ballots returned but listed as not returned for Georgia



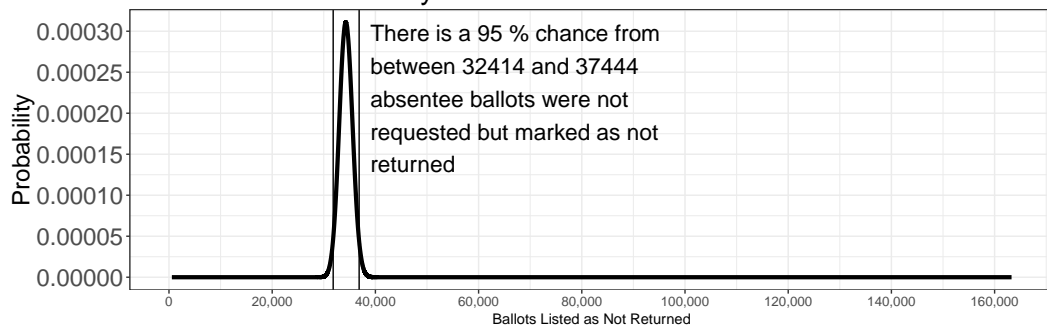
Probability of numbers of un-requested absentee ballots listed as not returned for Michigan



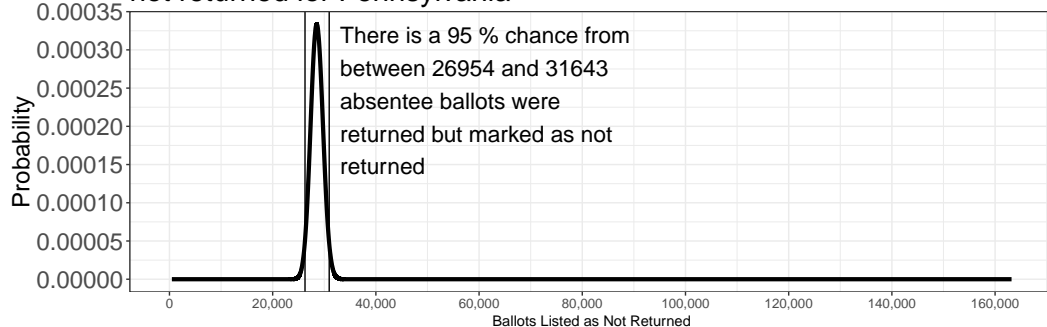
Probability of numbers of absentee ballots returned but listed as not returned for Michigan



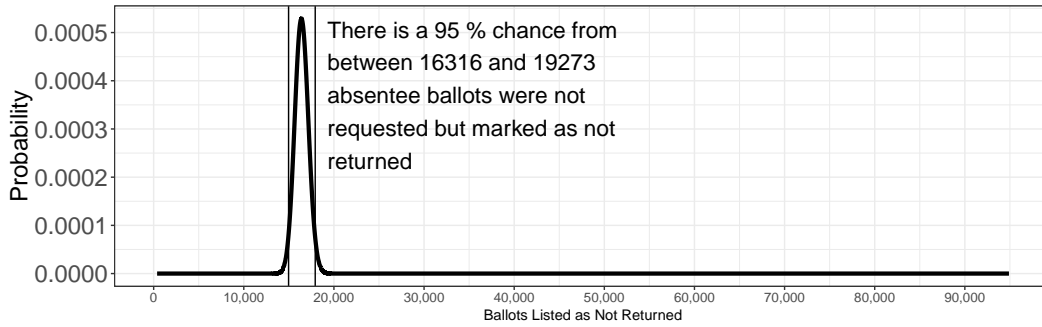
Probability of numbers of un-requested absentee ballots listed as not returned for Pennsylvania



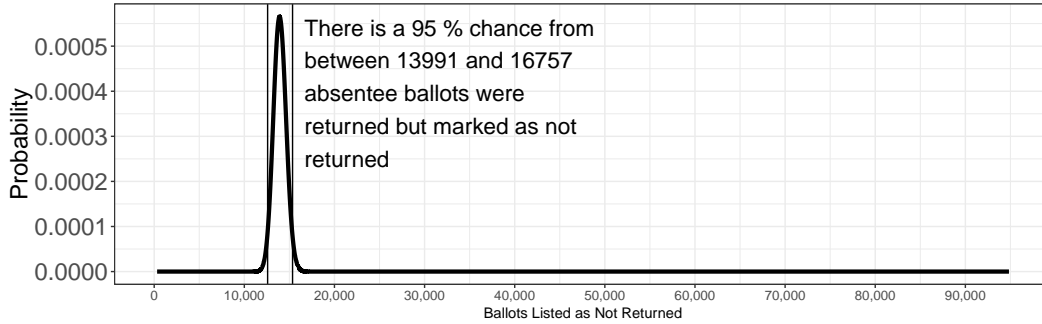
Probability of numbers of absentee ballots returned but listed as not returned for Pennsylvania



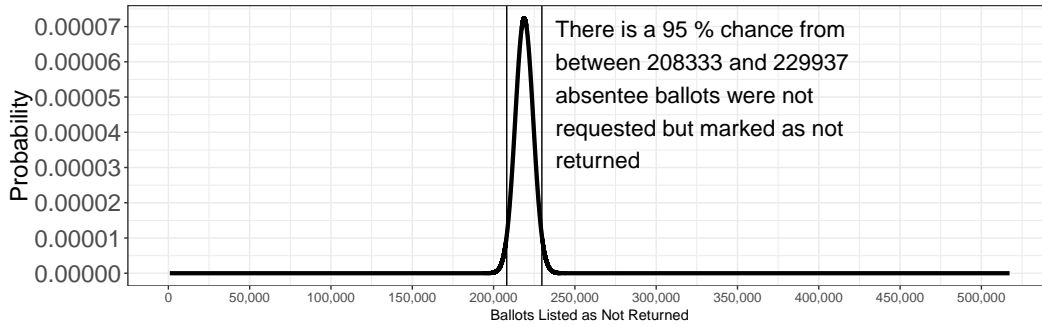
Probability of numbers of un-requested absentee ballots listed as not returned for Wisconsin



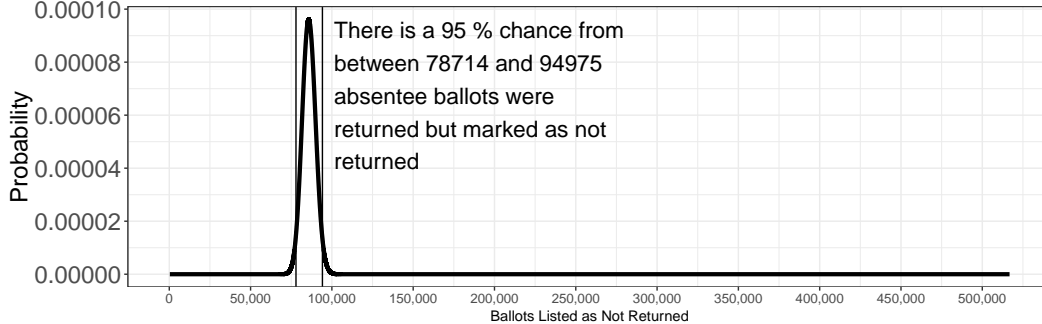
Probability of numbers of absentee ballots returned but listed as not returned for Wisconsin



Probability of numbers of un-requested absentee ballots listed as not returned for Arizona



Probability of numbers of absentee ballots returned but listed as not returned for Arizona



AZ Unreturned Live Agent - Mass Markets

| | | | 11/15/2020 | 11/16/2020 | 11/17/2020 | |
|---------|-------------------------|------------------------|------------|--------------|--------------|--|
| 5,604 | Completes | | 745 | 1,881 | 2,978 | |
| | | | | | | |
| 684 | Q4=01 | 1-Completed Survey | 116 | 212 | 356 | |
| 1,945 | VM Message Left | 2-Message Delivered VM | 90 | 657 | 1,198 | |
| 2,975 | up/RC | 3-Refused | 539 | 1,012 | 1,424 | |
| 74,437 | No Answer | 4-No Answer | 6,764 | 25,056 | 42,617 | |
| 1,663 | Numbers/Language | 5-Bad Number | 245 | 384 | 1,034 | |
| | | | | | | |
| | | | | | | |
| 100.00% | List Penetration | | | | | |
| | | | | | | |
| 81,708 | Data Loads | | | | | |

| Q1 - May I please speak to <lead on screen>? | | Response | 11/15/2020 | 11/16/2020 | 11/17/2020 |
|---|----------------|-----------------------------|-------------------|-------------------|-------------------|
| 1,812 | 40.05% | A-Reached Target | 307 | 554 | 951 |
| 335 | 7.40% | Uncertain | 80 | 124 | 131 |
| 2,377 | 52.54% | X = Refused | 382 | 854 | 1,141 |
| 0 | 0.00% | | | | |
| 4,524 | 100.00% | Sum of All Responses | 769 | 1,532 | 2,223 |

| Q2 - Did you request Absentee Ballot in state of AZ? | | Response | 11/15/2020 | 11/16/2020 | 11/17/2020 |
|---|--------|------------------|-------------------|-------------------|-------------------|
| 1,120 | 45.00% | A-Yes [Go to Q3] | 210 | 361 | 549 |

| | | | | | |
|--------------|----------------|-----------------------------|------------|------------|--------------|
| 885 | 35.56% | B-No [Go to Q4] | 162 | 286 | 437 |
| 24 | 0.96% | Member) [Go to Q3] | 5 | 9 | 10 |
| 21 | 0.84% | Member) [Go to Q4] | 3 | 10 | 8 |
| 72 | 2.89% | E-Unsure [Go to Close A] | 10 | 18 | 44 |
| 7 | 0.28% | [Go to Close A] | - | 1 | 6 |
| 360 | 14.46% | X = Refused | 45 | 69 | 246 |
| | | | | | |
| | | | | | |
| 2,489 | 100.00% | Sum of All Responses | 435 | 754 | 1,300 |

| Q3 - Did you mail your ballot | | Response | 11/15/2020 | 11/16/2020 | 11/17/2020 |
|-------------------------------|----------------|-----------------------------|------------|------------|--------------|
| 344 | 16.16% | A-Yes [Go to Q4] | 67 | 112 | 165 |
| 696 | 32.69% | B-No [Go to Close A] | 116 | 237 | 343 |
| 11 | 0.52% | Member) [Go to Q4] | 2 | 2 | 7 |
| 9 | 0.42% | Member) [Go to Close A] | 1 | 4 | 4 |
| 14 | 0.66% | Close A] | 3 | 4 | 7 |
| 1,055 | 49.55% | X = Refused | 201 | 326 | 528 |
| | | | | | |
| | | | | | |
| 2,129 | 100.00% | Sum of All Responses | 390 | 685 | 1,054 |

| Q4 - Can you please give us the best phone number to reach you at? | | Response | 11/15/2020 | 11/16/2020 | 11/17/2020 |
|--|--------|----------------------|------------|------------|------------|
| 678 | 82.48% | Q5] | 116 | 212 | 350 |
| 144 | 17.52% | B-Refused [Go to Q5] | 38 | 50 | 56 |

| | | | | | |
|------------|----------------|-----------------------------|------------|------------|------------|
| 0 | 0.00% | | | | |
| 0 | 0.00% | | | | |
| 822 | 100.00% | Sum of All Responses | 154 | 262 | 406 |

| Q5 - Can you provide us your email address? | | Response | 11/15/2020 | 11/16/2020 | 11/17/2020 |
|--|----------------|-----------------------------|-------------------|-------------------|-------------------|
| 127 | 18.57% | 01-Yes [Go to Close B] | 24 | 36 | 67 |
| 557 | 81.43% | 02-No [Go to Close B] | 92 | 176 | 289 |
| 0 | 0.00% | | | | |
| 684 | 100.00% | Sum of All Responses | 116 | 212 | 356 |

An Analysis of Surveys Regarding Absentee Ballots In Wisconsin

William M. Briggs

November 23, 2020

1 Summary

Survey data was collected from individuals in Wisconsin, sampling those listed as not returning absentee ballots. The data was provided by Matt Braynard.

The survey asked respondents whether they (a) had ever requested an absentee ballot, and, if so, (b) whether they had in fact returned this ballot. From this sample I produce predictions of the total numbers of: **Error #1**, those who were recorded as receiving absentee ballots *without* requesting them; and **Error #2**, those who returned absentee ballots but whose votes went missing (i.e. marked as unreturned).

The sizes of both errors were large.

2 Analysis Description

The analysis used (a) the number of absentee ballots recorded as unreturned, (b) the total responding to the survey, (c) the total of those saying they did not request a ballot, (d) the total of those saying they did request a ballot, and of these (e) the number saying they returned their ballots. I assume survey respondents are representative and the data is accurate.

From these data a simple parameter-free predictive model was used to calculate the probability of all possible outcomes. Pictures of these probabilities were derived, and the 95% prediction interval of the relevant numbers was calculated. The pictures appear in the Appendix at the end. They are summarized here with their 95% prediction intervals.

Error #1: being recorded as sent an absentee ballot without requesting one.

Error #2: sending back an absentee ballot and having it recorded as not returned.

| State | Unreturned ballots | Error #1 | Error #2 |
|-----------|--------------------|---------------|---------------|
| Wisconsin | 96,771 | 16,316–19,273 | 13,991–16,757 |

Ballots that were not requested, and ballots returned and marked as not returned were classed as *troublesome*. The estimated average number of troublesome ballots were then calculated using the table above and are presented next.

| State | Unreturned ballots | Estimated average troublesome ballots | Percent |
|-----------|--------------------|--|---------|
| Wisconsin | 96,771 | 29,594 | 31% |

3 Conclusion

There are clearly a large number of troublesome ballots in Wisconsin. Ballots marked as not returned that were never requested are clearly an error of some kind. The error is not small as a percent of the total recorded unreturned ballots.

Ballots sent back and unrecorded is a separate error. These represent votes that have gone missing, a serious mistake. The number of these missing ballots is also large.

Survey respondents were not asked if they received an unrequested ballot whether they sent these ballots back. This is clearly a lively possibility, and represents a third possible source of error, including the potential of voting twice (once by absentee and once at the polls). No estimates or likelihood can be calculated for this potential error due to absence of data.

4 Declaration of William M. Briggs, PhD

1. My name is William M. Briggs. I am over 18 years of age and am competent to testify in this action. All of the facts stated herein are true and based on my personal knowledge.
2. I received a Ph.D of Statistics from Cornell University in 2004.
3. I am currently a statistical consultant. I make this declaration in my personal capacity.
4. I have analyzed data regarding responses to questions relating to mail ballot requests, returns and related issues.

5. I attest to a reasonable degree of professional certainty that the resulting analysis are accurate.

I declare under the penalty of perjury that the foregoing is true and correct.



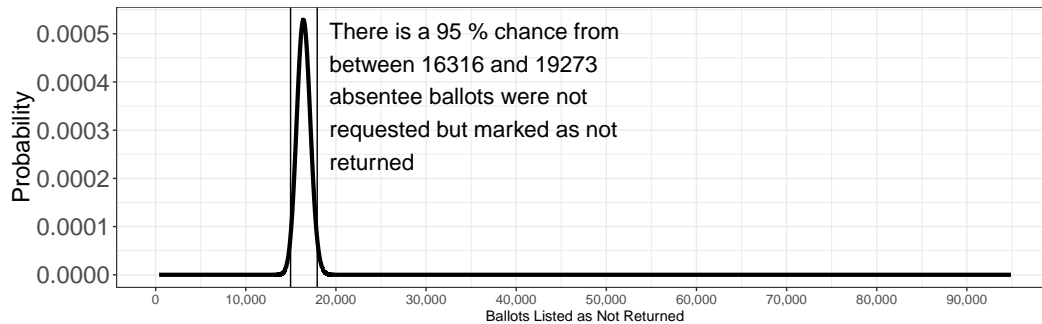
23 November 2020

William M. Briggs

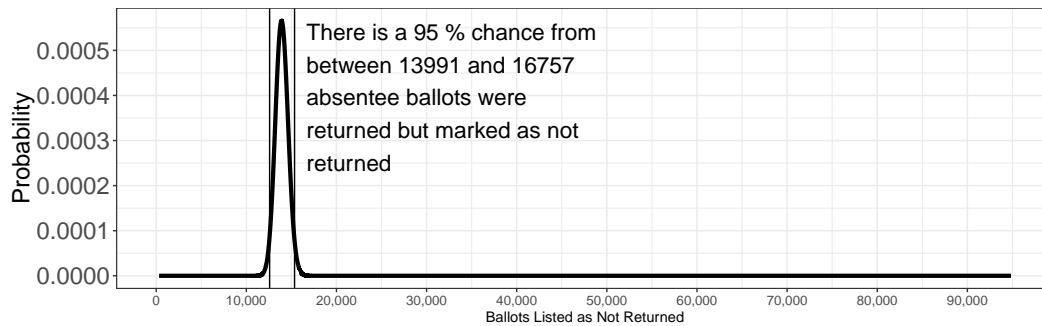
5 Appendix

The probability pictures for Wisconsin for each outcome as mentioned above.

Probability of numbers of un-requested absentee ballots listed as not returned for Wisconsin



Probability of numbers of absentee ballots returned but listed as not returned for Wisconsin



0270 PA Absentee Live ID Topline

| | | | 11/9/2020 | 11/10/2020 | 11/11/2020 |
|--------|-------------------------|------------------------|-------------|--------------|------------|
| 18037 | Completes | | 4419 | 13618 | 0 |
| 834 | survey** - Q4=01 | status = C | 178 | 656 | |
| 14,203 | Machines | status = AM | 3465 | 10738 | |
| 3,000 | Hang up/RC | status = R, IR, RC, DC | 776 | 2224 | |
| 3,521 | Numbers/Languag | status = D, BC, WN, NE | 556 | 2965 | |
| 0 | MA | status = MA | | | |
| 87.70% | List Penetration | | | | |
| 24,581 | Data Loads | | 24,581 | | |

| Q1 - May I please speak to <lead on screen>? | | Response | 9-Nov | 10-Nov | 11-Nov |
|---|----------------|-------------------------------|------------|-------------|----------|
| 2,262 | 75.86% | 1. Reached Target [Go to Q2]. | 593 | 1,669 | |
| 422 | 14.15% | Q2]. | 102 | 320 | |
| 298 | 9.99% | X = Refused <Go to CLOSE A> | 77 | 221 | |
| 739 | 24.78% | Q = Hangup <Go to CLOSE A> | 160 | 579 | |
| 2,982 | 100.00% | Sum of All Responses | 932 | 2789 | 0 |

| Q2 - Did you request an absentee ballot? | | Response | 9-Nov | 10-Nov | 11-Nov |
|---|--------|---------------------------|-------|--------|--------|
| 1,114 | 43.91% | 1. Yes. [Go to Go to Q3]. | 331 | 783 | |
| 531 | 20.93% | 2. No. [Go to Q4]. | 131 | 400 | |

| | | | | | |
|--------------|----------------|-----------------------------|------------|-------------|----------|
| 36 | 1.42% | confirmed "Yes" [Go to Q3] | 12 | 24 | |
| 25 | 0.99% | confirmed "No" [Go to Q4] | 9 | 16 | |
| 91 | 3.59% | 5. Unsure. [Go to Q3]. | 25 | 66 | |
| 89 | 3.51% | moment. [Go to Close A] | 17 | 72 | |
| 544 | 21.44% | A] | 105 | 439 | |
| 107 | 4.22% | X = Refused <Go to CLOSE A> | 29 | 78 | |
| 147 | 5.79% | Q = Hangup <Go to CLOSE A> | 36 | 111 | |
| 2,537 | 100.00% | Sum of All Responses | 695 | 1989 | 0 |

| Q3 - Did you mail back that ballot? | | Response | 9-Nov | 10-Nov | 11-Nov |
|-------------------------------------|----------------|--------------------------------|------------|------------|----------|
| 452 | 39.75% | 1. Yes. [Go to Go to Q4]. | 90 | 362 | |
| 632 | 55.58% | 2. No. [Go to Close A]. | 229 | 403 | |
| 11 | 0.97% | confirmed "Yes" [Go to Q4] | 1 | 10 | |
| 11 | 0.97% | confirmed "No" [Go to Close A] | 4 | 7 | |
| 15 | 1.32% | 5. Unsure. [Go to Close A]. | 6 | 9 | |
| 2 | 0.18% | moment. [Go to Close A] | 0 | 2 | |
| 14 | 1.23% | X = Refused <Go to CLOSE A> | 5 | 9 | |
| 13 | 1.14% | Q = Hangup <Go to CLOSE A> | 8 | 5 | |
| 1,137 | 100.00% | Sum of All Responses | 343 | 807 | 0 |

| Q4 - Can you please give us the best phone number to reach you at? | | Response | 9-Nov | 10-Nov | 11-Nov |
|--|----------------|-----------------------------|------------|------------|----------|
| 834 | 87.61% | 01 = Yes <Go to CLOSE B> | 178 | 656 | |
| 118 | 12.39% | X = Refused <Go to CLOSE A> | 36 | 82 | |
| 67 | 7.04% | Q = Hangup <Go to CLOSE A> | 17 | 50 | |
| 952 | 100.00% | Sum of All Responses | 231 | 788 | 0 |

WI Unreturned Live Agent - Mass Markets

| | | | 11/15/2020 | 11/16/2020 | 11/17/2020 |
|---------|----------------------------------|------------------------|------------|------------|------------|
| 4,614 | Completes | | - | 3,483 | 1,131 |
| | | | | | |
| 433 | Completed survey** - Q4=0 | 1-Completed Survey | - | 300 | 133 |
| 1,053 | VM Message Left | 2-Message Delivered VM | - | 804 | 249 |
| 3,128 | Refused/Early Hang up/RC | 3-Refused | - | 2,379 | 749 |
| 50,712 | No Answer | 4-No Answer | - | 40,391 | 10,321 |
| 1,944 | Bad/Wrong Numbers/Lang | 5-Bad Number | - | 1,289 | 655 |
| | | | | | |
| | | | | | |
| 100.00% | List Penetration | | | | |
| | | | | | |
| 57,271 | Data Loads | | | | |

| Q1 - May I please speak to <lead on screen>? | | Response | 11/15/2020 | 11/16/2020 | 11/17/2020 |
|---|---------|--|------------|------------|------------|
| 2,261 | 64.69% | A-Reached Target + B-What Is This About? / Uncertain | - | 1,343 | 475 |
| 1,677 | 47.98% | X = Refused | - | 1,202 | 475 |
| 0 | 0.00% | | | | |
| 3,495 | 100.00% | Sum of All Responses | - | 2,545 | 950 |

| Q2 - Did you request Absentee Ballot in state of WI? | | Response | 11/15/2020 | 11/16/2020 | 11/17/2020 |
|---|--------|------------------|------------|------------|------------|
| 1,699 | 62.39% | A-Yes [Go to Q3] | - | 1,374 | 325 |

| | | | | | |
|--------------|----------------|--|----------|--------------|------------|
| 379 | 13.92% | B-No [Go to Q4] | - | 240 | 139 |
| 32 | 1.18% | C-Yes (per Spouse/family Member) [Go to Q3] | - | 16 | 16 |
| 4 | 0.15% | D-No (per Spouse/family Member) [Go to Q4] | - | - | 4 |
| 44 | 1.62% | E-Unsure [Go to Close A] | - | 25 | 19 |
| 4 | 0.15% | F-Not Available At The Moment [Go to Close A] | - | 2 | 2 |
| 561 | 20.60% | X = Refused | - | 405 | 156 |
| | | | | | |
| | | | | | |
| 2,723 | 100.00% | Sum of All Responses | - | 2,062 | 661 |

| Q3 - Did you mail your ballot back? | | Response | 11/15/2020 | 11/16/2020 | 11/17/2020 |
|-------------------------------------|---------|--|------------|------------|------------|
| 316 | 14.67% | A-Yes [Go to Q4] | - | 238 | 78 |
| 1,286 | 59.70% | B-No [Go to Close A] | - | 1,069 | 217 |
| 9 | 0.42% | C-Yes (per Spouse/family Member) [Go to Q4] | - | 4 | 5 |
| 15 | 0.70% | D-No (per Spouse/family Member) [Go to Close A] | - | 8 | 7 |
| 28 | 1.30% | E-Unsure / Refused [Go to Close A] | - | 24 | 4 |
| 500 | 23.21% | X = Refused | - | 314 | 186 |
| | | | - | | |
| | | | | | |
| 2,154 | 100.00% | Sum of All Responses | - | 1,657 | 497 |

| Q4 - Can you please give us the best phone number to reach you at? | | Response | 11/15/2020 | 11/16/2020 | 11/17/2020 |
|--|----------------|-----------------------------------|------------|------------|------------|
| 432 | 80.00% | A-Yes (Capture Number) [Go to Q5] | - | 300 | 132 |
| 108 | 20.00% | B-Refused [Go to Q5] | - | 77 | 31 |
| 0 | 0.00% | | | | |
| 0 | 0.00% | | | | |
| 540 | 100.00% | Sum of All Responses | - | 377 | 163 |

| Q5 - Can you provide us your email address? | | Response | 11/15/2020 | 11/16/2020 | 11/17/2020 |
|---|----------------|-----------------------------|------------|------------|------------|
| 50 | 11.55% | 01-Yes [Go to Close B] | - | 37 | 13 |
| 383 | 88.45% | 02-No [Go to Close B] | - | 263 | 120 |
| 0 | 0.00% | | | | |
| 433 | 100.00% | Sum of All Responses | - | 300 | 133 |



0276 GA Unreturned_Absentee Live ID Topl

| | |
|--------|---|
| 15179 | Completes |
| | |
| 184 | Completed survey** - Q5=01 or 02 |
| 13,479 | Answering Machines |
| 1,516 | Refused/Early Hang up/RC |
| 4,902 | Bad/Wrong Numbers/Language Barrier |
| 0 | MA |
| | |
| 58.45% | List Penetration |
| | |
| 34,355 | Data Loads |

| | | |
|---|--|----------------|
| Q1 - May I please speak to <lead on screen>? | | |
| 767 | | 65.28% |
| 255 | | 21.70% |
| 153 | | 13.02% |
| 385 | | 32.77% |
| 1,175 | | 100.00% |

| | | |
|---|--|--------|
| Q2 - Did you request an absentee ballot? | | |
| 591 | | 61.31% |
| 128 | | 13.28% |

| | |
|------------|----------------|
| 39 | 4.05% |
| 14 | 1.45% |
| 40 | 4.15% |
| 82 | 8.51% |
| 70 | 7.26% |
| 58 | 6.02% |
| 964 | 100.00% |

| | |
|--|----------------|
| Q3 - Did you mail back that ballot? | |
| 240 | 38.52% |
| 317 | 50.88% |
| 17 | 2.73% |
| 9 | 1.44% |
| 24 | 3.85% |
| 11 | 1.77% |
| 5 | 0.80% |
| 7 | 1.12% |
| 623 | 100.00% |

| | |
|---|----------------|
| Q4 - Can you please give us the best phone number to reach you at? | |
| 313 | 82.15% |
| 49 | 12.86% |
| 19 | 4.99% |
| 18 | 4.72% |
| 381 | 100.00% |

| Q5 - May we please have an email address to follow-up as well? | |
|--|----------------|
| 99 | 28.86% |
| 229 | 66.76% |
| 15 | 4.37% |
| 19 | 5.54% |
| 343 | 100.00% |

ine

| | 11/16/2020 | 11/17/2020 |
|------------------------|------------|------------|
| | 8143 | 7036 |
| | | |
| status = C | 64 | 120 |
| status = AM | 7090 | 6389 |
| status = R, IR, RC, DC | 989 | 527 |
| status = D, BC, WN, NE | 2436 | 2466 |
| status = MA | 0 | 0 |
| | | |
| | | |
| | | |
| | 34,355 | |

| Response | 16-Nov | 17-Nov |
|--|------------|------------|
| 1. Reached Target [Go to Q2]. | 446 | 321 |
| 2. "What is this about?"/Uncertain [Go to Q2]. | 165 | 90 |
| X = Refused <Go to CLOSE A> | 104 | 49 |
| Q = Hangup <Go to CLOSE A> | 267 | 118 |
| Sum of All Responses | 982 | 578 |

| Response | 16-Nov | 17-Nov |
|---------------------------|--------|--------|
| 1. Yes. [Go to Go to Q3]. | 343 | 248 |
| 2. No. [Go to Q4]. | 84 | 44 |

| | | |
|---|------------|------------|
| 3. Spouse/other household member confirmed "Yes" [Go to Q3] | 24 | 15 |
| 4. Spouse/other household member confirmed "No" [Go to Q4] | 11 | 3 |
| 5. Unsure. [Go to Q3]. | 26 | 14 |
| 6. Actual target not available at the moment. [Go to Close A] | 48 | 34 |
| X = Refused <Go to CLOSE A> | 42 | 28 |
| Q = Hangup <Go to CLOSE A> | 33 | 25 |
| Sum of All Responses | 611 | 411 |

| Response | 16-Nov | 17-Nov |
|---|---------------|---------------|
| 1. Yes. [Go to Go to Q4]. | 149 | 91 |
| 2. No. [Go to Close A]. | 174 | 143 |
| 3. Spouse/other household member confirmed "Yes" [Go to Q4] | 10 | 7 |
| 4. Spouse/other household member confirmed "No" [Go to Close A] | 4 | 5 |
| 5. Unsure. [Go to Close A]. | 14 | 10 |
| 6. Actual target not available at the moment. [Go to Close A] | 8 | 3 |
| X = Refused <Go to CLOSE A> | 5 | 0 |
| Q = Hangup <Go to CLOSE A> | 3 | 4 |
| Sum of All Responses | 367 | 263 |

| Response | 16-Nov | 17-Nov |
|-----------------------------|---------------|---------------|
| 01 = Yes <Go to Q5> | 205 | 108 |
| 02 = No <Go to Q5> | 26 | 23 |
| X = Refused <Go to CLOSE A> | 13 | 6 |
| Q = Hangup <Go to CLOSE A> | 10 | 8 |
| Sum of All Responses | 254 | 145 |

| Response | 16-Nov | 17-Nov |
|-----------------------------|---------------|---------------|
| 01 = Yes <Go to CLOSE B> | 64 | 35 |
| 02 = No <Go to CLOSE B> | 144 | 85 |
| X = Refused <Go to CLOSE A> | 11 | 4 |
| Q = Hangup <Go to CLOSE A> | 12 | 7 |
| Sum of All Responses | 231 | 131 |

William M. Briggs, PhD

Statistician to the Stars!

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1. EXPERIENCE

- (1) 2016: AUTHOR OF *Uncertainty: The Soul of Modeling, Probability & Statistics*, a book which argues for a complete and fundamental change in the philosophy and practice of probability and statistics. Eliminate hypothesis testing and estimation, and move to verifiable predictions. This includes AI and machine learning. Call this The Great Reset, but a good one.
- (2) 2004-2016 ADJUNCT PROFESSOR OF STATISTICAL SCIENCE, CORNELL UNIVERSITY, ITHACA, NEW YORK
I taught a yearly Masters course to people who (rightfully) hate statistics. Interests: philosophy of science & probability, epistemology, epidemiology (ask me about the all-too-common epidemiologist fallacy), Bayesian statistics, medicine, climatology & meteorology, goodness of forecasts, overconfidence in science; public understanding of science, limitations of science, scientism; scholastic metaphysics (as it relates to epistemology).
- (3) 1998-PRESENT. STATISTICAL CONSULTANT, VARIOUS COMPANIES
Most of my time is spent coaxing people out of their money to tell them they are too sure of themselves. All manner of analyses cheerfully undertaken. Example: Fraud analysis; I created the *Wall Street Journal's* College Rankings. I consultant regularly at Methodist and other hospitals, start-ups, start-downs, and with any institution willing to fork it over.
- (4) 2003-2010. RESEARCH SCIENTIST, NEW YORK METHODIST HOSPITAL, NEW YORK
Besides the usual, I sit/sat on the Institutional Review Committee to assess the statistics of proposed research. I was an Associate Editor for *Monthly Weather Review* (through 2011). Also a member of the American Meteorological Society's Probability and Statistics Committee (through 2011). At a hospital? Yes, sir; at a hospital. It rains there, too, you know.
- (5) FALL 2007, FALL 2010 VISITING PROFESSOR OF STATISTICS, DEPARTMENT OF MATHEMATICS, CENTRAL MICHIGAN UNIVERSITY, MT. PLEASANT, MI
Who doesn't love a visit from a statistician? Ask me about the difference between "a degree" and "an education."
- (6) 2003-2007, ASSISTANT PROFESSOR STATISTICS, WEILL MEDICAL COLLEGE OF CORNELL UNIVERSITY, NEW YORK, NEW YORK
Working here gave me a sincere appreciation of the influences of government money; grants galore.
- (7) 2002-2003. GOTHAM RISK MANAGEMENT, NEW YORK
A start-up then, after Enron's shenanigans, a start-down. We set future weather derivative and weather insurance contract prices that incorporated information from medium- and long-range weather and climate forecasts.
- (8) 1998-2002. DOUBLECLICK, NEW YORK
Lead statistician. Lot of computer this and thats; enormous datasets.
- (9) 1993-1998. GRADUATE STUDENT, CORNELL UNIVERSITY

Meteorology, applied climatology, and finally statistics. Was Vice Chair of the graduate student government; probably elected thanks to a miracle.

- (10) 1992-1993. NATIONAL WEATHER SERVICE, SAULT STE. MARIE, MI
Forecast storms o' the day and launched enormous balloons in the name of Science. My proudest moment came when I was able to convince an ancient IBM-AT machine to talk to an *analog*, 110 baud, phone-coupled modem, all using BASIC!
- (11) 1989-1992. UNDERGRADUATE STUDENT, CENTRAL MICHIGAN UNIVERSITY
Meteorology and mathematics. Started the local student meteorology group to chase tornadoes. Who knew Michigan had so few? Spent a summer at U Michigan playing with a (science-fiction-sounding) lidar.
- (12) 1983-1989. UNITED STATES AIR FORCE
Cryptography and other secret stuff. Shot things; learned pinochle. I adopted and became proficient with a fascinating and versatile vocabulary. Irritate me for examples. TS/SCI, etc. security clearance (now inactive).

2. EDUCATION

- (1) Ph.D., 2004, Cornell University. Statistics.
- (2) M.S., 1995, Cornell University. Atmospheric Science.
- (3) B.S., Summa Cum Laude, 1992, Central Michigan University. Meteorology and Math.

3. PUBLICATIONS

3.0.1. *Popular.*

- (1) Op-eds in various newspapers; articles in *Stream*, *Crisis Magazine*, *The Remnant*, *Quadrant*, *Quirks*; blog with ~70,000 monthly readers. Various briefs submitted to government agencies, such as California Air Resources Board, Illinois Department of Natural Resources. Talks and holding-forths of all kinds.

3.0.2. *Books.*

- (1) Richards, JW, WM Briggs, and D Axe, 2020. *UThe Price of Panic: How the Tyranny of Experts Turned a Pandemic into a Catastrophe*. Regnery. Professors Jay Richards, William Briggs, and Douglas Axe take a deep dive into the crucial questions on the minds of millions of Americans during one of the most jarring and unprecedented global events in a generation.
- (2) Briggs, WM., 2016. *Uncertainty: The Soul of Modeling, Probability & Statistics*. Springer. Philosophy of probability and statistics. A new (old) way to view and to use statistics, a way that doesn't lead to heartbreak and pandemic over-certainty, like current methods do.
- (3) Briggs, WM., 2008 *Breaking the Law of Averages: Real Life Probability and Statistics in Plain English*. Lulu Press, New York. Free text for undergraduates.
- (4) Briggs, WM., 2006 *So You Think You're Psychic?* Lulu Press, New York. Hint: I'll bet you're not.

3.0.3. *Methods.*

- (1) Briggs, WM and J.C. Hanekamp, 2020. Uncertainty In The MAN Data Calibration & Trend Estimates. *Atmospheric Environment*, In review.
- (2) Briggs, WM and J.C. Hanekamp, 2020. Adjustments to the Ryden & McNeil Ammonia Flux Model. *Soil Use and Management*, In review.
- (3) Briggs, William M., 2020. Parameter-Centric Analysis Grossly Exaggerates Certainty. In *Data Science for Financial Econometrics*, V Kreinovich, NN Thach, ND Trung, DV Thanh (eds.), In press.
- (4) Briggs, WM, HT Nguyen, D Trafimow, 2019. Don't Test, Decide. In *Behavioral Predictive Modeling in Econometrics*, Springer, V Kreinovich, S Sriboonchitta (eds.). In press.
- (5) Briggs, William M. and HT Nguyen, 2019. Clarifying ASA's view on p-values in hypothesis testing. *Asian Journal of Business and Economics*, 03(02), 1–16.
- (6) Briggs, William M., 2019. Reality-Based Probability & Statistics: Solving The Evidential Crisis (invited paper). *Asian Journal of Business and Economics*, 03(01), 37–80.
- (7) Briggs, William M., 2019. Everything Wrong with P-Values Under One Roof. In *Beyond Traditional Probabilistic Methods in Economics*, V Kreinovich, NN Thach, ND Trung, DV Thanh (eds.), pp 22–44.
- (8) Briggs, WM, HT Nguyen, D Trafimow, 2019. The Replacement for Hypothesis Testing. In *Structural Changes and Their Econometric Modeling*, Springer, V Kreinovich, S Sriboonchitta (eds.), pp 3–17.
- (9) Trafimow, D, V Amrhein, CN Areshenkoff, C Barrera-Causil, ..., WM Briggs, (45 others), 2018. Manipulating the alpha level cannot cure significance testing. *Frontiers in Psychology*, 9, 699. doi.org/10.3389/fpsyg.2018.00699.
- (10) Briggs, WM, 2018. Testing, Prediction, and Cause in Econometric Models. In *Econometrics for Financial Applications*, ed. Anh, Dong, Kreinovich, and Thach. Springer, New York, pp 3–19.
- (11) Briggs, WM, 2017. The Substitute for p-Values. *JASA*, 112, 897–898.
- (12) J.C. Hanekamp, M. Crok, M. Briggs, 2017. Ammoniak in Nederland. *Enkele kritische wetenschappelijke kanttekeningen*. V-focus, Wageningen.
- (13) Briggs, WM, 2017. Math: Old, New, and Equalitarian. *Academic Questions*, 30(4), 508–513.
- (14) Monckton, C, W Soon, D Legates, ... (several others), WM Briggs 2018. On an error in applying feedback theory to climate. In submission (currently *J. Climate*).
- (15) Briggs, WM, JC Hanekamp, M Crok, 2017. Comment on Goedhart and Huijsmans. *Soil Use and Management*, 33(4), 603–604.
- (16) Briggs, WM, JC Hanekamp, M Crok, 2017. Response to van Pul, van Zanten and Wichink Kruit. *Soil Use and Management*, 33(4), 609–610.
- (17) Jaap C. Hanekamp, William M. Briggs, and Marcel Crock, 2016. A volatile discourse - reviewing aspects of ammonia emissions, models, and atmospheric concentrations in The Netherlands. *Soil Use and Management*, 33(2), 276–287.

- (18) Christopher Monckton of Brenchley, Willie Soon, David Legates, William Briggs, 2015. Keeping it simple: the value of an irreducibly simple climate model. *Science Bulletin*. August 2015, Volume 60, Issue 15, pp 1378–1390.
- (19) Briggs, WM, 2015. The Third Way Of Probability & Statistics: Beyond Testing and Estimation To Importance, Relevance, and Skill. *arxiv.org/abs/1508.02384*.
- (20) Briggs, WM, 2015. The Crisis Of Evidence: Why Probability And Statistics Cannot Discover Cause. *arxiv.org/abs/1507.07244*.
- (21) David R. Legates, Willie Soon, William M. Briggs, Christopher Monckton of Brenchley, 2015. Climate Consensus and ‘Misinformation’: A Rejoinder to Agnotology, Scientific Consensus, and the Teaching and Learning of Climate Change. *Science and Education*, 24, 299–318, DOI 10.1007/s11191-013-9647-9.
- (22) Briggs, WM, 2014. The Problem Of Grue Isn’t. *arxiv.org/abs/1501.03811*.
- (23) Christopher Monckton of Brenchley, Willie Soon, David Legates, William Briggs, 2014. Why models run hot: results from an irreducibly simple climate model. *Science Bulletin*. January 2015, Volume 60, Issue 1, pp 122-135.
- (24) Briggs, WM, 2014. Common Statistical Fallacies. *Journal of American Physicians and Surgeons*, Volume 19 Number 2, 58–60.
- (25) Aalt Bast, William M. Briggs, Edward J. Calabrese, Michael F. Fenech, Jaap C. Hanekamp, Robert Heaney, Ger Rijkers, Bert Schwitters, Pieter Verhoeven, 2013. Scientism, Legalism and Precaution—Contending with Regulating Nutrition and Health Claims in Europe. *European Food and Feed Law Review*, 6, 401–409.
- (26) Legates, DR, Soon, W, and Briggs, 2013. Learning and Teaching Climate Science: The Perils of Consensus Knowledge Using Agnotology. *Science and Education*, DOI 10.1007/s11191-013-9588-3.
- (27) Briggs, WM, 2012. On Probability Leakage. *arxiv.org/abs/1201.3611*.
- (28) Briggs, WM, 2012. Why do statisticians answer questions no one ever asks? *Significance*. Volume 9 Issue 1 Doi: 10.1111/j.1740-9713.2012.00542.x. 30–31.
- (29) Briggs, WM, Soon, W, Legates, D, Carter, R, 2011. A Vaccine Against Arrogance. *Water, Air, & Soil Pollution*: Volume 220, Issue 1 (2011), Page 5-6
- (30) Briggs, WM, and R Zaretski, 2009. Induction and falsifiability in statistics. *arxiv.org/abs/math/0610859*.
- (31) Briggs, WM, 2011. Discussion to A Gelman. Why Tables are Really Much Better than Graphs. *Journal Computational and Graphical Statistics*. Volume 20, 16–17.
- (32) Zaretski R, Gilchrist MA, Briggs WM, and Armagan A, 2010. Bias correction and Bayesian analysis of aggregate counts in SAGE libraries. *BMC Bioinformatics*, 11:72doi:10.1186/1471-2105-11-72.
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- (37) Briggs, WM, Positive evidence for non-arbitrary assignments of probability, 2007. Edited by Knuth et al. Proceedings 27th International Workshop on Bayesian Inference and Maximum Entropy Methods in Science and Engineering. American Institute of Physics. 101-108.
- (38) Briggs, WM, R Zaretzki, 2007. The Skill Plot: a graphical technique for the evaluating the predictive usefulness of continuous diagnostic tests. *With Discussion. Biometrics*. **64(1)**, 250-6; discussion 256-61. PMID: 18304288.
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- (40) Briggs, WM, and D Ruppert, 2006. Assessing the skill of yes/no forecasts for Markov observations. *Monthly Weather Review*. **134**, 2601-2611.
- (41) Briggs, WM, 2007. Review of *Statistical Methods in the Atmospheric Sciences* (second edition, 2006) by Wilks, D.S. *Journal of the American Statistical Association*, **102**, 380.
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- (45) Briggs, WM, 2004. Discussion to T Gneiting, LI Stanberry, EP Gritmit, L Held, NA Johnson, 2008. Assessing probabilistic forecasts of multivariate quantities, with an application to ensemble predictions of surface winds. *Test*. **17**, 240-242.
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- (49) Briggs, W.M., and R.A. Levine, 1997. Wavelets and Field Forecast Verification. *Monthly Weather Review*, **25 (6)**, 1329-1341.
- (50) Briggs, WM, and DS Wilks, 1996. Estimating monthly and seasonal distributions of temperature and precipitation using the new CPC long-range forecasts. *Journal of Climate*, **9**, 818-826.

- (51) Briggs, WM, and DS Wilks, 1996. Extension of the CPC long-lead temperature and precipitation outlooks to general weather statistics. *Journal of Climate*, **9**, 3496-3504.

3.0.4. Applications.

- (1) Jamorabo, Daniel, Renelus, Benjamin, Briggs, WM, 2019. "Comparative outcomes of EUS-guided cystogastrostomy for peripancreatic fluid collections (PFCs): A systematic review and meta-analysis, 2019. *Therapeutic Advances in Gastrointestinal Endoscopy*, in press.
- (2) Benjamin Renelus, S Paul, S Peterson, N Dave, D amorabo, W Briggs, P Kancharla, 2019. Racial disparities with esophageal cancer mortality at a high-volume university affiliated center: An All ACCESS Invitation, *Journal of the National Medical Association*, in press.
- (3) Mehta, Bella, S Ibrahim, WM Briggs, and P Efthimiou, 2019. Racial/Ethnic variations in morbidity and mortality in Adult Onset Still's Disease: An analysis of national dataset", *Seminars in Arthritis and Rheumatism*, doi: 10.1016/j.semarthrit.2019.04.0044.
- (4) Ivanov A, Dabiesingh DS, Bhumireddy GP, Mohamed A, Asfour A, Briggs WM, Ho J, Khan SA, Grossman A, Klem I, Sacchi TJ, Heitner JF. Prevalence and Prognostic Significance of Left Ventricular Noncompaction in Patients Referred for Cardiac Magnetic Resonance Imaging. *Circ Cardiovasc Imaging*. 2017 Sep;10(9). pii: e006174. doi: 10.1161/CIRCIMAGING.117.006174.
- (5) Ivanov A, Kaczowska BA, Khan SA, Ho J, Tavakol M, Prasad A, Bhumireddy G, Beall AF, Klem I, Mehta P, Briggs WM, fpaSacchi TJ, Heitner JF, 2017. Review and Analysis of Publication Trends over Three Decades in Three High Impact Medicine Journals. *PLoS One*. 2017 Jan 20;12(1):e0170056. doi: 10.1371/journal.pone.0170056.
- (6) A. Ivanova, G.P. Bhumireddy, D.S. Dabiesingh, S.A. Khana, J. Hoa N. Krishna, N. Dontineni, J.A Socolow, W.M. Briggs, I. Klem, T.J. Sacchi, J.F. Heitner, 2016. Importance of papillary muscle infarction detected by cardiac magnetic resonance imaging in predicting cardiovascular events. *International Journal of Cardiology*. Volume 220, 1 October 2016, Pages 558–563. PMID: 27390987.
- (7) A Ivanov, J Yossef, J Taillon, B Worku, I Gulkarov, A Tortolani, TJ Sacchi, WM Briggs, SJ Brener, JA Weingarten, JF Heitner, 2015. Do pulmonary function tests improve risk stratification before cardiothoracic surgery? *Journal of Thoracic and Cardiovascular Surgery*. 2015 Oct 30. pii: S0022-5223(15)02165-0. doi: 10.101. PMID: 26704058.
- (8) Chen O, Sharma A, Ahmad I, Bourji N, Nestoiter K, Hua P, Hua B, Ivanov A, Yossef J, Klem I, Briggs WM, Sacchi TJ, Heitner JF, 2015. Correlation between pericardial, mediastinal, and intrathoracic fat volumes with the presence and severity of coronary artery disease, metabolic syndrome, and cardiac risk factors. *Eur Heart J Cardiovasc Imaging*. 2015 Jan;16(1):37-46. doi: 10.1093/ehjci/jeu145.
- (9) Chery J, Semaan E, Darji S, Briggs W, Yarmush J, D'Ayala M, 2014. Impact of regional versus general anesthesia on the clinical outcomes of patients undergoing major lower extremity amputation. *Ann Vasc Surg*, 2014 Jul;28(5):1149-56. PMID: 24342828.
- (10) Visconti A, Gaeta T, Cabezon M, Briggs W, Pyle M., 2013. Focused Board Intervention (FBI): A Remediation Program for Written Board Preparation

- and the Medical Knowledge Core Competency. *J Grad Med Educ.* 2013 Sep;5(3):464-7. PMID: 24404311.
- (11) Annika Krystyna, D Kumari, R Tenney, R Kosanovic, T Safi, WM Briggs, K Hennessey, M Skelly, E Enriquez, J Lajeune, W Ghani and MD Schwalb, 2013. Hepatitis c antibody testing in African American and Hispanic men in New York City with prostate biopsy. *Oncology Discovery*, Vol 1. DOI: 10.7243/2052-6199-1-1.
 - (12) Ziad Y. Fayad, Elie Semaan, Bashar Fahoum, W. Matt Briggs, Anthony Tortolani, and Marcus D'Ayala, 2013. Aortic mural thrombus in the normal or minimally atherosclerotic aorta: A systematic review and meta-analysis of the available literature. *Ann Vasc Surg.*, Apr;27(3):282-90. DOI:10.1016/j.avsg.2012.03.011.
 - (13) Elizabeth Haines, Gerardo Chiricolo, Kresimir Aralica, William Briggs, Robert Van Amerongen, Andrew Laudenbach, Kevin O'Rourke, and Lawrence Melniker MD, 2012. Derivation of a Pediatric Growth Curve for Inferior Vena Caval Diameter in Healthy Pediatric Patients. *Crit Ultrasound J.* 2012 May 28;4(1):12. doi: 10.1186/2036-7902-4-12.
 - (14) Wei Li, Piotr Gorecki, Elie Semaan, William Briggs, Anthony J. Tortolani, Marcus D'Ayala, 2011. Concurrent Prophylactic Placement of Inferior Vena Cava Filter in gastric bypass and adjustable banding operations: An analysis of the Bariatric Outcomes Longitudinal Database (BOLD). *J. Vascular Surg.* 2012 Jun;55(6):1690-5. doi: 10.1016/j.jvs.2011.12.056.
 - (15) Krystyna A, Kosanovic R, Tenney R, Safi T, Briggs WM, et al. (2011) Colonoscopy Findings in Men with Transrectal Ultrasound Guided Prostate Biopsy: Association of Colonic Lipoma with Prostate Cancer. *J Cancer Sci Ther* S4:002. doi:10.4172/1948-5956.S4-002
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FILED**NOV 24 2020**

No. _____

**CLERK OF SUPREME COURT
OF WISCONSIN**

In the Supreme Court of Wisconsin

The Wisconsin Voters Alliance, Ronald H. Heuer, William Joseph Laurent, Richard Kucksdorf, James Fitzgerald, Kelly Ruh, William Berglund, John Jaconi, Donna Utschig, Jeff Wellhouse, Kurt Johnson, Thomas Reczek, Linda Sinkula, Atilla Thorbjorsson, Jeff Kleiman, Navin Jarugumilli, Jonathan Hunt, Suzanne Vlach, Jacob Blazkovec, Donald Utschig, Carol Aldinger, Jay Plaumann, Deborah Gorman, Robert R. Liebeck, Valerie M. Bruns Liebeck, Edward Hudak, Ron Cork, Charles Risch, Karl Lehrke, Arnet Holty and Joseph McGrath, PETITIONERS,

v.

Wisconsin Elections Commission, and its members
Ann S. Jacobs, Mark L. Thomsen, Marge Bostelman,
Julie M. Glancey, Dean Knudson, Robert F. Spindell,
Jr., in their official capacities, Governor Tony Evers,
in his official capacity, RESPONDENTS

On Petition For Original Action
Before this Court

EXPERT REPORT OF MATTHEW BRAYNARD

I. INTRODUCTION

I have been retained as an expert witness on behalf of Petitioners in the above captioned proceeding. I expect to testify on the following subject matters: (i) analysis of the database for the November 3, 2020 election for the selection of Presidential Electors in the State of Wisconsin ("State"); (ii) render opinions regarding whether individuals identified in the State's voter database actually voted; and (iii) render opinions regarding whether individuals identified in the State's voter database were actually qualified to vote on election day.

This is a statement of my relevant opinions and an outline of the factual basis for these opinions. The opinions and facts contained herein are based on the information made available to me in this case prior to preparation of this report, as well as my professional experience as an election data analyst.

I reserve the right to supplement or amend this statement on the basis of further information obtained prior to the time of trial or in order to clarify or correct the information contained herein.

II. DOCUMENTS REVIEWED

I reviewed the following documents in arriving at my opinions.

1. The voter records and election returns as maintained on the State's election database;

2. Records maintained by the National Change of Address Source which is maintained by the United States Postal Service and which is available for licensed users on the internet. I am a licensed member.
3. Records developed by the staff of my call centers and social media researchers; and
4. A national voter database maintained by L2 Political;

In addition, I discussed the facts of this matter with Petitioner's attorney Erick G. Kaardal and members of his legal team.

III. PROFESSIONAL QUALIFICATIONS

I have attached hereto as Exhibit 1 a true and correct copy of my resume. As detailed in the resume, I graduated from George Washington University in 2000 with a degree in business administration with a concentration in finance and management information systems. I have been working in the voter data and election administration field since 1996. I have worked building and deploying voter databases for the Republican National Committee, five Presidential campaigns, and no less than one-hundred different campaigns and election-related organizations in all fifty states and the U.S. Virgin Islands. I worked for eight years as a senior analyst at the nation's premier redistricting and election administration firm, Election Data Services, where I worked with states and municipalities on voter databases, delineation, and litigation support related to these matters. Also, while at Election Data Services, I worked under our contract with the US Census Bureau analyzing voting age population. Since 2004, I have worked for my own business, now known as External Affairs, Inc., providing

statistical and data analysis for local, state, and federal candidates and policy organizations in the areas of voter targeting, polling/research, fundraising, branding, and online development and strategy. My firm has worked for over two-hundred candidates from president to town council and over a dozen DC-based policy/advocacy organizations.

With respect to publications I have authored in the last 10 years, I have not authored any publications in the last ten years.

IV. COMPENSATION

I have been retained as an expert witness for Petitioners. I am being compensated for a flat fee of \$40,000.

V. PRIOR TESTIMONY

I have not provided testimony as an expert either at trial or in deposition in the last four years.

VI. STATEMENT OF OPINIONS

As set forth above, I have been engaged to provide expert opinions regarding analysis in the November 3, 2020 election of Presidential electors. Based on my review of the documents set forth above, my discussions with statisticians and analysts working with me and at my direction, my discussions with the attorneys representing the Petitioners, I have the following opinions:

1. It is my opinion, to a reasonable degree of scientific certainty, that in the State, the State's database for the November 3, 2020 election show 96,711 voters whom the state marks as having requested and been sent an absentee ballot did not return it. It is my opinion, to a reasonable degree of scientific certainty, that in my sample

of this universe, 18.12% of these absentee voters in the State did not request an absentee ballot.

2. From the State's database for the November 3, 2020 election and our call center results, it is my opinion to a reasonable degree of scientific certainty that 96,771 individuals whom the State's database identifies as having not returned an absentee ballot, that in my sample of this universe, 15.37% of those absentee voters did in fact mail back an absentee ballot to the clerk's office.
3. From the State's database for the November 3, 2020 election, the NCOA database, and our call center results, it is my opinion to a reasonable degree of scientific certainty that out of the 26,673 individuals had changed their address before the election, that in my sample of this universe, 1.11% of those individuals denied casting a ballot.
4. From the State's database for the November 3, 2020 election and the NCOA database and other state's voter databases, it is my opinion to a reasonable degree of scientific certainty, that at least 6,848 absentee or early voters were not residents of the State when they voted.
5. From the State's database for the November 3, 2020 election and my staff's review of social media for voters who applied for indefinitely confined absentee voting status, it is my opinion to a reasonable degree of scientific certainty, that of the 213,215 who claimed indefinitely confined absentee voter status in the State, that in my sample of this universe, 45.23% of those individuals were not indefinitely confined on Election Day.
6. From the State's database for the November 3, 2020 election and comparing that data to other states voting data and identifying individuals who cast early/absentee ballots in multiple states, it is my opinion to a reasonable degree of scientific certainty, that at least 234 individuals in the State voted in multiple states.

VII. BASIS AND REASONS SUPPORTING OPINIONS.

First, State maintains a database for the November 3, 2020 election which I obtained from L2 Political and which L2 Political obtained from the State's records on, among other things, voters who applied for an absentee or early voter status. I received this database from L2 Political in a table format with columns and rows which can be searched, sorted and filtered. Each row sets forth data on an individual voter. Each

column contained information such as the name of the voter, the voter's address, whether the voter applied for an absentee ballot, whether the voter voted and whether the voter voted indefinitely confined status.

Second, we are able to obtain other data from other sources such as the National Change of Address Database maintained by the United States Postal Service and licensed by L2 Political. This database also in table format shows the name of an individual, the individual's new address, the individual's old address and the date that the change of address became effective.

Third, I conducted randomized surveys of data obtained from the State's database by having my staff or the call center's staff make phone calls to and ask questions of individuals identified on the State's database by certain categories such as absentee voters who did not return a ballot. Our staff, if they talked to any of these individuals, would then ask a series of questions beginning with a confirmation of the individual's name to ensure it matched the name of the voter identified in the State's database. The staff would then ask additional questions of the individuals and record the answers.

Fourth, I had this staff survey a random sample I obtained from the State's database on indefinitely confined voters. The staff conducted research on the internet and social media postings by these individuals. Staff would undertake to determine if the individual was the individual listed on the database meant the State's definition of indefinitely confined. Staff would then attempt to determine if the individuals had posted photos, images or other information demonstrating that the individuals were not indefinitely confined. For instance, if the individual's social media showed a photo on or

near election day of the individual doing something inconsistent with indefinitely confined status such as riding a bike. Staff would then record the results as either “not indefinitely confined,” “confirmed indefinitely confined,” or “inconclusive.”

Fifth, attached as Exhibits 2 is my written analysis of the data obtained.

Below are the opinions I rendered and the basis of the reasons for those opinions.

1. It is my opinion, to a reasonable degree of scientific certainty, that in the State, the State’s database for the November 3, 2020 election show 96,711 voters whom the state marks as having requested and been sent an absentee ballot did not return it. It is my opinion, to a reasonable degree of scientific certainty, that in my sample of this universe, 18.12% of these absentee voters in the State did not request an absentee ballot.

I obtained this data from the State via L2 Political after the November 3, 2020, Election Day. This data identified 96,771 absentee voters who were sent an absentee ballot but who failed to return the absentee ballot.

I then had my staff make phone calls to a sample of this universe. When contacted, I had my staff confirm the individual’s identity by name. Once the name was confirmed, I then had staff ask if the person requested an absentee ballot or not. Staff then recorded the number of persons who answered yes. My staff then recorded that of the 2,114 individuals who answered the question, 1,731 individuals answered yes to the question whether they requested an absentee ballot. My staff recorded that 383 individuals answered no to the question whether they requested an absentee ballot. Attached as Exhibit 2 is my written analysis containing information from the data above on absentee voters. Paragraph 2 of Exhibit 2 presents this information.

Next, I then had staff ask the individuals who answered yes, they requested an absentee ballot, whether the individual mailed back the absentee ballot or did not mail back the absentee ballot. Staff then recorded that of the 1,626 individuals who answered the question, 325 individuals answered yes, they mailed back the absentee ballot. Staff recorded 1301 individuals answered no, they did not mail back the absentee ballot.

Paragraph 2 of Exhibit 2 presents this information.

Based on these results, 18.12% of our sample of these absentee voters in the State did not request an absentee ballot.

2. From the State's database for the November 3, 2020 election and our call center results, it is my opinion to a reasonable degree of scientific certainty that 96,771 individuals whom the State's database identifies as having not returned an absentee ballot, that in my sample of this universe, 15.37% of those absentee voters did in fact mail back an absentee ballot to the clerk's office.

This opinion includes the analysis set forth above. Among the 1,626 who told our call center that they did request an absentee ballot and answered the second question, 325 told our staff that they mailed the absentee ballot back, which is 15.37% of those whom the State identified as having not returned the absentee ballot the State sent them.

Paragraph 2 of Exhibit 2 presents this information.

3. From the State's database for the November 3, 2020 election, the NCOA database, and our call center results, it is my opinion to a reasonable degree of scientific certainty that out of the 26,673 individuals had changed their address before the election, that in my sample of this universe, 1.11% of those individuals denied casting a ballot.

On Exhibit 2, in paragraph 4, I took the State's database of all absentee or early voters and matched those voters to the NCOA database for the day after election day.

This data identified 26,673 individuals whose address on the State's database did not match the address on the NCOA database on election day. Next, I had my staff call the persons identified and ask these individuals whether they had voted. My call center staff identified 1,607 individuals who confirmed that they had casted a ballot. My call center staff identified 18 individuals who denied casting a ballot. Our analysis shows that 1.11% of our sample of these individuals who changed address did not vote despite the State's data recorded that the individuals did vote.

4. From the State's database for the November 3, 2020 election and the NCOA data and other state's voter data, it is my opinion to a reasonable degree of scientific certainty, that at least 6,848 absentee or early voters were not residents of the State when they voted.

On Exhibit 2, in paragraph 1, I took the State's database of all absentee or early voters and matched those voters to the NCOA database for the day after Election Day. This data identified 6,207 individuals who had moved of the State prior to Election Day. Further, by comparing the other 49 states voter databases to the State's database, I identified 765 who registered to vote in a state other than the State subsequent to the date they registered to vote in the State. When merging these two lists and removing the duplicates, and accounting for moves that would not cause an individual to lose their residency and eligibility to vote under State law, these voters total 6,848.

5. From the State's database for the November 3, 2020 election and my staff's review of social media for voters who applied for indefinitely confined absentee voting status, it is my opinion to a reasonable degree of scientific certainty, that of the 213,215 who claimed indefinitely confined absentee voter status in the State, that in my sample of this universe, 45.23% of those individuals were not indefinitely confined on Election Day.

This opinion is taken from data developed on Exhibit 3. For this determination, I had my staff investigate using the internet and social media the individuals the State's data identified as claiming indefinitely confined status in their absentee ballot applications. The staff conducted research on the internet and social media postings by these individuals. Staff would undertake to determine if the individual was the individual listed on the database as indefinitely confined. Staff would then attempt to determine if the individuals had posted photos, images or other information demonstrating that the individuals were not indefinitely confined. For instance, if the individual's social media showed a photo on or near election day doing something inconsistent with indefinitely confined status such as riding a bike. Staff would then record the results as either "not indefinitely confined," "confirmed indefinitely confined," or "inconclusive."

These results showed that of the 213,215 who claimed indefinitely confined absentee voter status in the State, that in my sample of this universe, 45.23% of those individuals were not indefinitely confined on Election Day.

6. From the State's database for the November 3, 2020 election and comparing that data to other states voting data and identifying individuals who cast early/absentee ballots in multiple states, it is my opinion to a reasonable degree of scientific certainty, that at least 234 individuals in the State voted in multiple states.

On Exhibit 2, in paragraph 2, I had my staff compare the State's early and absentee voters to other states voting data and identified individuals who cast early/absentee ballots in multiple states. My staff located 234 individuals who voted in the State and in other states for the November 3, 2020 general election.

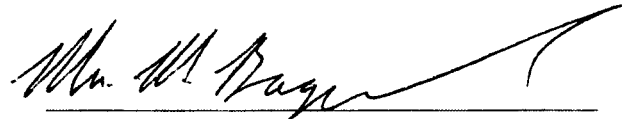
**VIII. EXHIBITS TO BE USED AT TRIAL TO SUMMARIZE OR EXPLAIN
OPINIONS**

At the present time, I intend to rely on the documents produced set forth above as possible exhibits.

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Dated: 11/22/2020


Matthew Braynard

FILED**NOV 24 2020**

No. _____

**CLERK OF SUPREME COURT
OF WISCONSIN**

In the Supreme Court of Wisconsin

The Wisconsin Voters Alliance, Ronald H. Heuer, William Joseph Laurent, Richard Kucksdorf, James Fitzgerald, Kelly Ruh, William Berglund, John Jaconi, Donna Utschig, Jeff Wellhouse, Kurt Johnson, Thomas Reczek, Linda Sinkula, Atilla Thorbjorsson, Jeff Kleiman, Navin Jarugumilli, Jonathan Hunt, Suzanne Vlach, Jacob Blazkovec, Donald Utschig, Carol Aldinger, Jay Plaumann, Deborah Gorman, Robert R. Liebeck, Valerie M. Bruns Liebeck, Edward Hudak, Ron Cork, Charles Risch, Karl Lehrke, Arnet Holty and Joseph McGrath, PETITIONERS,

v.

Wisconsin Elections Commission, and its members
Ann S. Jacobs, Mark L. Thomsen, Marge Bostelman,
Julie M. Glancey, Dean Knudson, Robert F. Spindell,
Jr., in their official capacities, Governor Tony Evers,
in his official capacity, RESPONDENTS

On Petition For Original Action
Before this Court

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I. INTRODUCTION

I have been retained as an expert witness on behalf of Petitioners in the above captioned proceeding. I expect to testify on the following subject matters: (i) analysis of the database for the November 3, 2020 election for the selection of Presidential Electors in the State of Wisconsin ("State"); (ii) render opinions regarding whether individuals identified in the State's voter database actually voted; and (iii) render opinions regarding whether individuals identified in the State's voter database were actually qualified to vote on election day.

This is a statement of my relevant opinions and an outline of the factual basis for these opinions. The opinions and facts contained herein are based on the information made available to me in this case prior to preparation of this report, as well as my professional experience as an election data analyst.

I reserve the right to supplement or amend this statement on the basis of further information obtained prior to the time of trial or in order to clarify or correct the information contained herein.

II. DOCUMENTS REVIEWED

I reviewed the following documents in arriving at my opinions.

1. The voter records and election returns as maintained on the State's election database;

2. Records maintained by the National Change of Address Source which is maintained by the United States Postal Service and which is available for licensed users on the internet. I am a licensed member.
3. Records developed by the staff of my call centers and social media researchers; and
4. A national voter database maintained by L2 Political;

In addition, I discussed the facts of this matter with Petitioner's attorney Erick G. Kaardal and members of his legal team.

III. PROFESSIONAL QUALIFICATIONS

I have attached hereto as Exhibit 1 a true and correct copy of my resume. As detailed in the resume, I graduated from George Washington University in 2000 with a degree in business administration with a concentration in finance and management information systems. I have been working in the voter data and election administration field since 1996. I have worked building and deploying voter databases for the Republican National Committee, five Presidential campaigns, and no less than one-hundred different campaigns and election-related organizations in all fifty states and the U.S. Virgin Islands. I worked for eight years as a senior analyst at the nation's premier redistricting and election administration firm, Election Data Services, where I worked with states and municipalities on voter databases, delineation, and litigation support related to these matters. Also, while at Election Data Services, I worked under our contract with the US Census Bureau analyzing voting age population. Since 2004, I have worked for my own business, now known as External Affairs, Inc., providing

statistical and data analysis for local, state, and federal candidates and policy organizations in the areas of voter targeting, polling/research, fundraising, branding, and online development and strategy. My firm has worked for over two-hundred candidates from president to town council and over a dozen DC-based policy/advocacy organizations.

With respect to publications I have authored in the last 10 years, I have not authored any publications in the last ten years.

IV. COMPENSATION

I have been retained as an expert witness for Petitioners. I am being compensated for a flat fee of \$40,000.

V. PRIOR TESTIMONY

I have not provided testimony as an expert either at trial or in deposition in the last four years.

VI. STATEMENT OF OPINIONS

As set forth above, I have been engaged to provide expert opinions regarding analysis in the November 3, 2020 election of Presidential electors. Based on my review of the documents set forth above, my discussions with statisticians and analysts working with me and at my direction, my discussions with the attorneys representing the Petitioners, I have the following opinions:

1. It is my opinion, to a reasonable degree of scientific certainty, that in the State, the State's database for the November 3, 2020 election show 96,711 voters whom the state marks as having requested and been sent an absentee ballot did not return it. It is my opinion, to a reasonable degree of scientific certainty, that in my sample

of this universe, 18.12% of these absentee voters in the State did not request an absentee ballot.

2. From the State's database for the November 3, 2020 election and our call center results, it is my opinion to a reasonable degree of scientific certainty that 96,771 individuals whom the State's database identifies as having not returned an absentee ballot, that in my sample of this universe, 15.37% of those absentee voters did in fact mail back an absentee ballot to the clerk's office.
3. From the State's database for the November 3, 2020 election, the NCOA database, and our call center results, it is my opinion to a reasonable degree of scientific certainty that out of the 26,673 individuals had changed their address before the election, that in my sample of this universe, 1.11% of those individuals denied casting a ballot.
4. From the State's database for the November 3, 2020 election and the NCOA database and other state's voter databases, it is my opinion to a reasonable degree of scientific certainty, that at least 6,848 absentee or early voters were not residents of the State when they voted.
5. From the State's database for the November 3, 2020 election and my staff's review of social media for voters who applied for indefinitely confined absentee voting status, it is my opinion to a reasonable degree of scientific certainty, that of the 213,215 who claimed indefinitely confined absentee voter status in the State, that in my sample of this universe, 45.23% of those individuals were not indefinitely confined on Election Day.
6. From the State's database for the November 3, 2020 election and comparing that data to other states voting data and identifying individuals who cast early/absentee ballots in multiple states, it is my opinion to a reasonable degree of scientific certainty, that at least 234 individuals in the State voted in multiple states.

VII. BASIS AND REASONS SUPPORTING OPINIONS.

First, State maintains a database for the November 3, 2020 election which I obtained from L2 Political and which L2 Political obtained from the State's records on, among other things, voters who applied for an absentee or early voter status. I received this database from L2 Political in a table format with columns and rows which can be searched, sorted and filtered. Each row sets forth data on an individual voter. Each

column contained information such as the name of the voter, the voter's address, whether the voter applied for an absentee ballot, whether the voter voted and whether the voter voted indefinitely confined status.

Second, we are able to obtain other data from other sources such as the National Change of Address Database maintained by the United States Postal Service and licensed by L2 Political. This database also in table format shows the name of an individual, the individual's new address, the individual's old address and the date that the change of address became effective.

Third, I conducted randomized surveys of data obtained from the State's database by having my staff or the call center's staff make phone calls to and ask questions of individuals identified on the State's database by certain categories such as absentee voters who did not return a ballot. Our staff, if they talked to any of these individuals, would then ask a series of questions beginning with a confirmation of the individual's name to ensure it matched the name of the voter identified in the State's database. The staff would then ask additional questions of the individuals and record the answers.

Fourth, I had this staff survey a random sample I obtained from the State's database on indefinitely confined voters. The staff conducted research on the internet and social media postings by these individuals. Staff would undertake to determine if the individual was the individual listed on the database meant the State's definition of indefinitely confined. Staff would then attempt to determine if the individuals had posted photos, images or other information demonstrating that the individuals were not indefinitely confined. For instance, if the individual's social media showed a photo on or

near election day of the individual doing something inconsistent with indefinitely confined status such as riding a bike. Staff would then record the results as either “not indefinitely confined,” “confirmed indefinitely confined,” or “inconclusive.”

Fifth, attached as Exhibits 2 is my written analysis of the data obtained.

Below are the opinions I rendered and the basis of the reasons for those opinions.

1. It is my opinion, to a reasonable degree of scientific certainty, that in the State, the State’s database for the November 3, 2020 election show 96,711 voters whom the state marks as having requested and been sent an absentee ballot did not return it. It is my opinion, to a reasonable degree of scientific certainty, that in my sample of this universe, 18.12% of these absentee voters in the State did not request an absentee ballot.

I obtained this data from the State via L2 Political after the November 3, 2020, Election Day. This data identified 96,771 absentee voters who were sent an absentee ballot but who failed to return the absentee ballot.

I then had my staff make phone calls to a sample of this universe. When contacted, I had my staff confirm the individual’s identity by name. Once the name was confirmed, I then had staff ask if the person requested an absentee ballot or not. Staff then recorded the number of persons who answered yes. My staff then recorded that of the 2,114 individuals who answered the question, 1,731 individuals answered yes to the question whether they requested an absentee ballot. My staff recorded that 383 individuals answered no to the question whether they requested an absentee ballot. Attached as Exhibit 2 is my written analysis containing information from the data above on absentee voters. Paragraph 2 of Exhibit 2 presents this information.

Next, I then had staff ask the individuals who answered yes, they requested an absentee ballot, whether the individual mailed back the absentee ballot or did not mail back the absentee ballot. Staff then recorded that of the 1,626 individuals who answered the question, 325 individuals answered yes, they mailed back the absentee ballot. Staff recorded 1301 individuals answered no, they did not mail back the absentee ballot.

Paragraph 2 of Exhibit 2 presents this information.

Based on these results, 18.12% of our sample of these absentee voters in the State did not request an absentee ballot.

2. From the State's database for the November 3, 2020 election and our call center results, it is my opinion to a reasonable degree of scientific certainty that 96,771 individuals whom the State's database identifies as having not returned an absentee ballot, that in my sample of this universe, 15.37% of those absentee voters did in fact mail back an absentee ballot to the clerk's office.

This opinion includes the analysis set forth above. Among the 1,626 who told our call center that they did request an absentee ballot and answered the second question, 325 told our staff that they mailed the absentee ballot back, which is 15.37% of those whom the State identified as having not returned the absentee ballot the State sent them.

Paragraph 2 of Exhibit 2 presents this information.

3. From the State's database for the November 3, 2020 election, the NCOA database, and our call center results, it is my opinion to a reasonable degree of scientific certainty that out of the 26,673 individuals had changed their address before the election, that in my sample of this universe, 1.11% of those individuals denied casting a ballot.

On Exhibit 2, in paragraph 4, I took the State's database of all absentee or early voters and matched those voters to the NCOA database for the day after election day.

This data identified 26,673 individuals whose address on the State's database did not match the address on the NCOA database on election day. Next, I had my staff call the persons identified and ask these individuals whether they had voted. My call center staff identified 1,607 individuals who confirmed that they had casted a ballot. My call center staff identified 18 individuals who denied casting a ballot. Our analysis shows that 1.11% of our sample of these individuals who changed address did not vote despite the State's data recorded that the individuals did vote.

4. From the State's database for the November 3, 2020 election and the NCOA data and other state's voter data, it is my opinion to a reasonable degree of scientific certainty, that at least 6,848 absentee or early voters were not residents of the State when they voted.

On Exhibit 2, in paragraph 1, I took the State's database of all absentee or early voters and matched those voters to the NCOA database for the day after Election Day. This data identified 6,207 individuals who had moved of the State prior to Election Day. Further, by comparing the other 49 states voter databases to the State's database, I identified 765 who registered to vote in a state other than the State subsequent to the date they registered to vote in the State. When merging these two lists and removing the duplicates, and accounting for moves that would not cause an individual to lose their residency and eligibility to vote under State law, these voters total 6,848.

5. From the State's database for the November 3, 2020 election and my staff's review of social media for voters who applied for indefinitely confined absentee voting status, it is my opinion to a reasonable degree of scientific certainty, that of the 213,215 who claimed indefinitely confined absentee voter status in the State, that in my sample of this universe, 45.23% of those individuals were not indefinitely confined on Election Day.

This opinion is taken from data developed on Exhibit 3. For this determination, I had my staff investigate using the internet and social media the individuals the State's data identified as claiming indefinitely confined status in their absentee ballot applications. The staff conducted research on the internet and social media postings by these individuals. Staff would undertake to determine if the individual was the individual listed on the database as indefinitely confined. Staff would then attempt to determine if the individuals had posted photos, images or other information demonstrating that the individuals were not indefinitely confined. For instance, if the individual's social media showed a photo on or near election day doing something inconsistent with indefinitely confined status such as riding a bike. Staff would then record the results as either "not indefinitely confined," "confirmed indefinitely confined," or "inconclusive."

These results showed that of the 213,215 who claimed indefinitely confined absentee voter status in the State, that in my sample of this universe, 45.23% of those individuals were not indefinitely confined on Election Day.

6. From the State's database for the November 3, 2020 election and comparing that data to other states voting data and identifying individuals who cast early/absentee ballots in multiple states, it is my opinion to a reasonable degree of scientific certainty, that at least 234 individuals in the State voted in multiple states.

On Exhibit 2, in paragraph 2, I had my staff compare the State's early and absentee voters to other states voting data and identified individuals who cast early/absentee ballots in multiple states. My staff located 234 individuals who voted in the State and in other states for the November 3, 2020 general election.

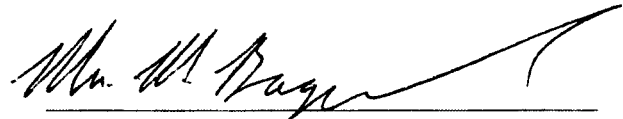
**VIII. EXHIBITS TO BE USED AT TRIAL TO SUMMARIZE OR EXPLAIN
OPINIONS**

At the present time, I intend to rely on the documents produced set forth above as possible exhibits.

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SIGNATURE PAGE TO FOLLOW

Dated: 11/22/2020


Matthew Braynard

[REDACTED]

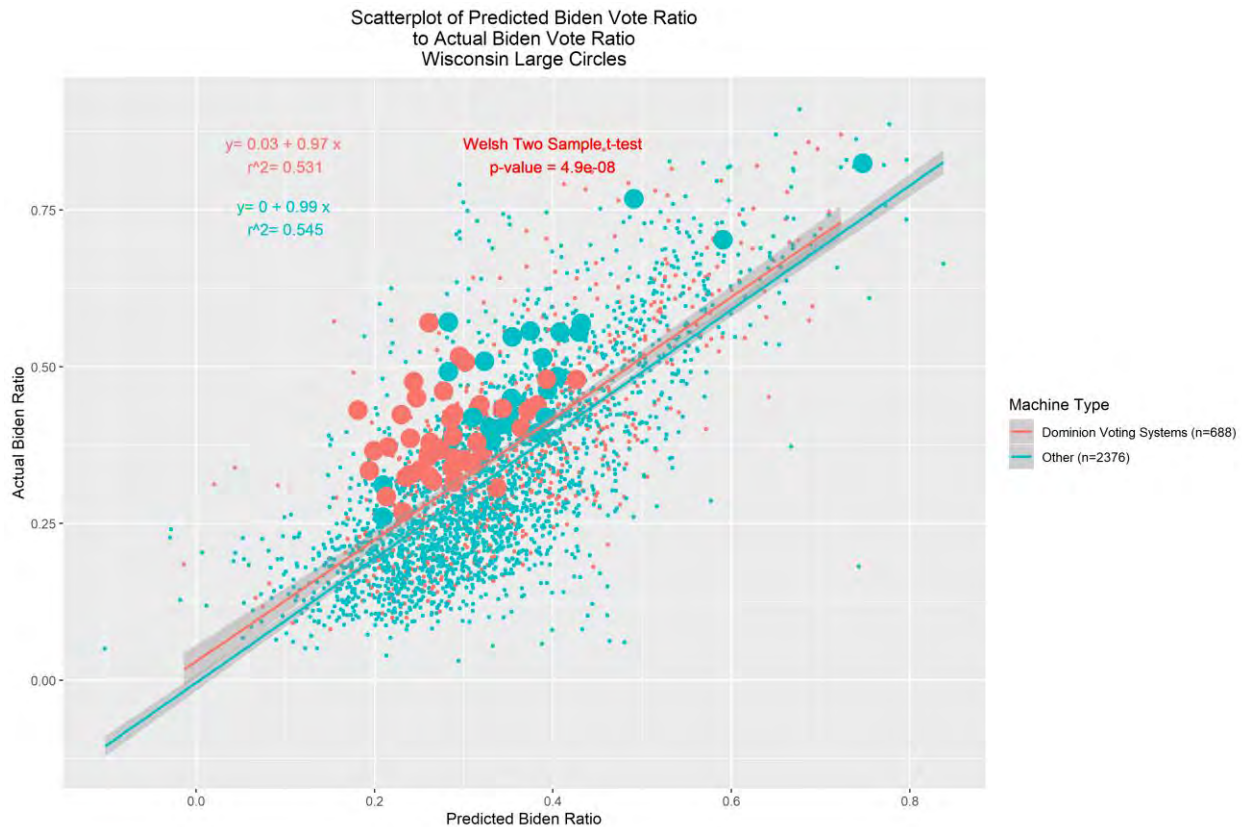
Pursuant to 28 U.S.C Section 1746, I, [REDACTED], make the following declaration.

1. I am over the age of 21 years and am a resident of Monroe County, Florida.
2. I am under no legal disability that would prevent me from giving this declaration.
3. I hold a Bachelor of Science degree in Mathematics and a Master of Science degree in Statistics.
4. For thirty years, I have conducted statistical data analysis for companies in various industries, including aerospace, consumer packaged goods, disease detection and tracking, and fraud detection.
5. From November 13th, 2020 through November 28th, 2020, I conducted in-depth statistical analysis of publicly available data on the 2020 U.S. Presidential Election. This data included vote counts for each county in the United States, U.S. Census data, and type of voting machine data provided by the U.S. Election Assistance Committee.
6. The analysis yielded several “red flags” concerning the percentage of votes won by candidate Biden in counties using voting machines provided by Dominion Voting Systems. These red flags occurred in several States in the country, including Wisconsin.
7. I began by using Chi-Squared Automatic Interaction Detection (CHAID), which treats the data in an agnostic way—that is, it imposes no parametric assumptions that could otherwise introduce bias. Here, I posed the following question: “Do any voting machine

types appear to have unusual results?” The answer provided by the statistical technique/algorithm was that machines from Dominion Voting Systems (Dominion) produced abnormal results.

8. Subsequent graphical and statistical analysis shows the unusual pattern involving machines from Dominion occurs in at least 100 counties and multiple States, including Wisconsin.
9. The results from most, if not all counties using the Dominion machines is three to five point six percentage points higher in favor of candidate Biden than the results should be. This pattern is seen easily in graphical form when the results from “Dominion” counties are overlaid against results from “non-Dominion” counties. The results from “Dominion” counties do not match the results from the rest of the counties in the United States. The results are certainly statistically significant, with a p-value of < 0.00004 . This translates into a statistical impossibility that something unusual involving Dominion machines is *not* occurring. This pattern appears in multiple States, including Wisconsin, and the margin of votes implied by the unusual activity would easily sway the election results.
10. The following graph shows the pattern. The large red dots are counties in Wisconsin that use Dominion voting machines. Almost all of them are above the blue prediction line, when in normal situations approximately half of them would be below the prediction line (as evidenced by approximately half the counties in the U.S. (blue dots) that are below the blue centerline). The p-value of statistical analysis regarding the centerline for the red dots (Wisconsin counties

with Dominion machines) is 0.000000049, pointing to a statistical impossibility that this is a “random” statistical anomaly. Some external force caused this anomaly



11. To confirm that Dominion machines were the source of the pattern/anomaly, I conducted further analysis using propensity scoring using U.S. census variables (Including ethnicities, income, professions, population density and other social/economic data) , which was used to place counties into paired groups. Such an analysis is important because one concern could be that counties with Dominion systems are systematically different from their counterparts, so abnormalities in the margin for Biden are driven by other characteristics unrelated to the election.

12. After matching counties using propensity score analysis, the only difference between the groups was the presence of Dominion machines. This approach again showed a highly statistically significant difference between the two groups, with candidate Biden again averaging three percentage points higher in Dominion counties than in the associated paired county. The associated p-value is < 0.00005 , against indicating a statistical impossibility that something unusual is not occurring involving Dominion machines.
13. The results of the analysis and the pattern seen in the included graph strongly suggest a systemic, system-wide algorithm was enacted by an outside agent, causing the results of Wisconsin's vote tallies to be inflated by somewhere between three and five point six percentage points. Statistical estimating yields that in Wisconsin, the best estimate of the number of impacted votes is 181,440. However, a 95% confidence interval calculation yields that as many as 236,520 votes may have been impacted.

I declare under penalty of perjury that the forgoing is true and correct.
Executed this November 28th, 2020.

,

/s/

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|---------------------|---------------------------------|--|--|
| ADAMS COUNTY - 01 | CITY OF ADAMS - 01201 | ES&S DS200 | ES&S AutoMARK |
| ADAMS COUNTY - 01 | TOWN OF ADAMS - 01002 | None | Vote Pad |
| ADAMS COUNTY - 01 | TOWN OF BIG FLATS - 01004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ADAMS COUNTY - 01 | TOWN OF COLBURN - 01006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ADAMS COUNTY - 01 | TOWN OF DELL PRAIRIE - 01008 | None | Vote Pad |
| ADAMS COUNTY - 01 | TOWN OF EASTON - 01010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ADAMS COUNTY - 01 | TOWN OF JACKSON - 01012 | None | Vote Pad |
| ADAMS COUNTY - 01 | TOWN OF LEOLA - 01014 | None | Vote Pad |
| ADAMS COUNTY - 01 | TOWN OF LINCOLN - 01016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ADAMS COUNTY - 01 | TOWN OF MONROE - 01018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ADAMS COUNTY - 01 | TOWN OF NEW CHESTER - 01020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ADAMS COUNTY - 01 | TOWN OF NEW HAVEN - 01022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ADAMS COUNTY - 01 | TOWN OF PRESTON - 01024 | None | Vote Pad |
| ADAMS COUNTY - 01 | TOWN OF QUINCY - 01026 | None | Vote Pad |
| ADAMS COUNTY - 01 | TOWN OF RICHFIELD - 01028 | None | Vote Pad |
| ADAMS COUNTY - 01 | TOWN OF ROME - 01030 | ES&S DS200 | ES&S AutoMARK |
| ADAMS COUNTY - 01 | TOWN OF SPRINGVILLE - 01032 | None | Vote Pad |
| ADAMS COUNTY - 01 | TOWN OF STRONGS PRAIRIE - 01034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ADAMS COUNTY - 01 | VILLAGE OF FRIENDSHIP - 01126 | None | Vote Pad |
| ASHLAND COUNTY - 02 | CITY OF ASHLAND - MAIN - 02201 | ES&S M100 | ES&S AutoMARK |
| ASHLAND COUNTY - 02 | CITY OF MELLEN - 02251 | None | ES&S AutoMARK |
| ASHLAND COUNTY - 02 | TOWN OF AGENDA - 02002 | None | ES&S AutoMARK |
| ASHLAND COUNTY - 02 | TOWN OF ASHLAND - 02004 | None | ES&S AutoMARK |
| ASHLAND COUNTY - 02 | TOWN OF CHIPPEWA - 02006 | None | ES&S AutoMARK |
| ASHLAND COUNTY - 02 | TOWN OF GINGLES - 02008 | None | ES&S AutoMARK |
| ASHLAND COUNTY - 02 | TOWN OF GORDON - 02010 | None | ES&S AutoMARK |
| ASHLAND COUNTY - 02 | TOWN OF JACOBS - 02012 | None | ES&S AutoMARK |
| ASHLAND COUNTY - 02 | TOWN OF LA POINTE - 02014 | None | ES&S AutoMARK |
| ASHLAND COUNTY - 02 | TOWN OF MARENGO - 02016 | None | ES&S AutoMARK |
| ASHLAND COUNTY - 02 | TOWN OF MORSE - 02018 | None | ES&S AutoMARK |
| ASHLAND COUNTY - 02 | TOWN OF PEEKSVILLE - 02020 | None | ES&S AutoMARK |
| ASHLAND COUNTY - 02 | TOWN OF SANBORN - 02022 | None | ES&S AutoMARK |
| ASHLAND COUNTY - 02 | TOWN OF SHANAGOLDEN - 02024 | None | ES&S AutoMARK |
| ASHLAND COUNTY - 02 | TOWN OF WHITE RIVER - 02026 | None | ES&S AutoMARK |
| ASHLAND COUNTY - 02 | VILLAGE OF BUTTERNUT - 02106 | None | ES&S AutoMARK |
| BARRON COUNTY - 03 | CITY OF BARRON - 03206 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | CITY OF CHETEK - 03211 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | CITY OF CUMBERLAND - 03212 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | CITY OF RICE LAKE - 03276 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF ALMENA - 03002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF ARLAND - 03004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF BARRON - 03006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF BEAR LAKE - 03008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF CEDAR LAKE - 03010 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF CHETEK - 03012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|----------------------|---------------------------------------|--|--|
| BARRON COUNTY - 03 | TOWN OF CLINTON - 03014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF CRYSTAL LAKE - 03016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF CUMBERLAND - 03018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF DALLAS - 03020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF DOVRE - 03022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF DOYLE - 03024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF LAKELAND - 03026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF MAPLE GROVE - 03028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF MAPLE PLAIN - 03030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF OAK GROVE - 03032 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF PRAIRIE FARM - 03034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF PRAIRIE LAKE - 03036 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF RICE LAKE - 03038 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF SIOUX CREEK - 03040 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF STANFOLD - 03042 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF STANLEY - 03044 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF SUMNER - 03046 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF TURTLE LAKE - 03048 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | TOWN OF VANCE CREEK - 03050 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | VILLAGE OF ALMENA - 03101 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | VILLAGE OF CAMERON - 03111 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | VILLAGE OF DALLAS - 03116 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | VILLAGE OF HAUGEN - 03136 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | VILLAGE OF PRAIRIE FARM - 03171 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BARRON COUNTY - 03 | VILLAGE OF TURTLE LAKE - MAIN - 03186 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BAYFIELD COUNTY - 04 | CITY OF BAYFIELD - 04206 | ES&S M100 | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | CITY OF WASHBURN - 04291 | ES&S M100 | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF BARKSDALE - 04002 | ES&S M100 | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF BARNES - 04004 | ES&S M100 | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF BAYFIELD - 04006 | ES&S M100 | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF BAYVIEW - 04008 | ES&S M100 | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF BELL - 04010 | None | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF CABLE - 04012 | ES&S M100 | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF CLOVER - 04014 | None | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF DELTA - 04016 | None | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF DRUMMOND - 04018 | None | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF EILEEN - 04020 | ES&S M100 | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF GRAND VIEW - 04021 | ES&S M100 | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF HUGHES - 04022 | ES&S M100 | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF IRON RIVER - 04024 | ES&S M100 | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF KELLY - 04026 | ES&S M100 | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF KEYSTONE - 04028 | None | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF LINCOLN - 04030 | None | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF MASON - 04032 | None | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF NAMAKAGON - 04034 | None | ES&S AutoMARK |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|----------------------|---------------------------------------|--|--|
| BAYFIELD COUNTY - 04 | TOWN OF ORIENTA - 04036 | None | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF OULU - 04038 | ES&S M100 | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF PILSEN - 04040 | None | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF PORT WING - 04042 | None | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF RUSSELL - 04046 | ES&S M100 | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF TRIPP - 04048 | None | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | TOWN OF WASHBURN - 04050 | ES&S M100 | ES&S AutoMARK |
| BAYFIELD COUNTY - 04 | VILLAGE OF MASON - 04151 | None | ES&S AutoMARK |
| BROWN COUNTY - 05 | CITY OF DE PERE - 05216 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | CITY OF GREEN BAY - 05231 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | TOWN OF EATON - 05010 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | TOWN OF GLENMORE - 05012 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | TOWN OF GREEN BAY - 05014 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | TOWN OF HOLLAND - 05018 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | TOWN OF HUMBOLDT - 05022 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | TOWN OF LAWRENCE - 05024 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | TOWN OF LEDGEVIEW - 05025 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | TOWN OF MORRISON - 05026 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | TOWN OF NEW DENMARK - 05028 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | TOWN OF PITTSFIELD - 05030 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | TOWN OF ROCKLAND - 05034 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | TOWN OF SCOTT - 05036 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | TOWN OF WRIGHTSTOWN - 05040 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | VILLAGE OF ALLOUEZ - 05102 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | VILLAGE OF ASHWAUBENON - 05104 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | VILLAGE OF BELLEVUE - 05106 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | VILLAGE OF DENMARK - 05116 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | VILLAGE OF HOBART - 05126 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | VILLAGE OF HOWARD - MAIN - 05136 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | VILLAGE OF PULASKI - MAIN - 05171 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | VILLAGE OF SUAMICO - 05178 | ES&S DS200 | ES&S ExpressVote |
| BROWN COUNTY - 05 | VILLAGE OF WRIGHTSTOWN - MAIN - 05191 | ES&S DS200 | ES&S ExpressVote |
| BUFFALO COUNTY - 06 | CITY OF ALMA - 06201 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | CITY OF BUFFALO CITY - 06206 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | CITY OF FOUNTAIN CITY - 06226 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | CITY OF MONDOVI - 06251 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | TOWN OF ALMA - 06002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | TOWN OF BELVIDERE - 06004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | TOWN OF BUFFALO - 06006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | TOWN OF CANTON - 06008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | TOWN OF CROSS - 06010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | TOWN OF DOVER - 06012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | TOWN OF GILMANTON - 06014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | TOWN OF GLENCOE - 06016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | TOWN OF LINCOLN - 06018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|---------------------|--------------------------------|--|--|
| BUFFALO COUNTY - 06 | TOWN OF MAXVILLE - 06020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | TOWN OF MILTON - 06022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | TOWN OF MODENA - 06024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | TOWN OF MONDOVI - 06026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | TOWN OF MONTANA - 06028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | TOWN OF NAPLES - 06030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | TOWN OF NELSON - 06032 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | TOWN OF WAUMANDEE - 06034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | VILLAGE OF COCHRANE - 06111 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BUFFALO COUNTY - 06 | VILLAGE OF NELSON - 06154 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF ANDERSON - 07002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF BLAINE - 07004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF DANIELS - 07006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF DEWEY - 07008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF GRANTSBURG - 07010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF JACKSON - 07012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF LA FOLLETTE - 07014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF LINCOLN - 07016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF MEENON - 07018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF OAKLAND - 07020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF ROOSEVELT - 07022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF RUSK - 07024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF SAND LAKE - 07026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF SCOTT - 07028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF SIREN - 07030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF SWISS - 07032 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF TRADE LAKE - 07034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF UNION - 07036 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF WEBB LAKE - 07038 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF WEST MARSHLAND - 07040 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | TOWN OF WOOD RIVER - 07042 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | VILLAGE OF GRANTSBURG - 07131 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | VILLAGE OF SIREN - 07181 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| BURNETT COUNTY - 07 | VILLAGE OF WEBSTER - 07191 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CALUMET COUNTY - 08 | CITY OF BRILLION - 08206 | ES&S DS200 | ES&S ExpressVote |
| CALUMET COUNTY - 08 | CITY OF CHILTON - 08211 | ES&S DS200 | ES&S ExpressVote |
| CALUMET COUNTY - 08 | CITY OF NEW HOLSTEIN - 08261 | ES&S DS200 | ES&S ExpressVote |
| CALUMET COUNTY - 08 | TOWN OF BRILLION - 08002 | ES&S DS200 | ES&S ExpressVote |
| CALUMET COUNTY - 08 | TOWN OF BROTHERTOWN - 08004 | ES&S DS200 | ES&S ExpressVote |
| CALUMET COUNTY - 08 | TOWN OF CHARLESTOWN - 08006 | ES&S DS200 | ES&S ExpressVote |
| CALUMET COUNTY - 08 | TOWN OF CHILTON - 08008 | ES&S DS200 | ES&S ExpressVote |
| CALUMET COUNTY - 08 | TOWN OF HARRISON - 08010 | ES&S DS200 | ES&S ExpressVote |
| CALUMET COUNTY - 08 | TOWN OF NEW HOLSTEIN - 08012 | ES&S DS200 | ES&S ExpressVote |
| CALUMET COUNTY - 08 | TOWN OF RANTOUL - 08014 | ES&S DS200 | ES&S ExpressVote |
| CALUMET COUNTY - 08 | TOWN OF STOCKBRIDGE - 08016 | ES&S DS200 | ES&S ExpressVote |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|----------------------|--------------------------------------|--|---|
| CALUMET COUNTY - 08 | TOWN OF WOODVILLE - 08018 | ES&S DS200 | ES&S ExpressVote |
| CALUMET COUNTY - 08 | VILLAGE OF HARRISON - MAIN - 08131 | ES&S DS200 | ES&S ExpressVote |
| CALUMET COUNTY - 08 | VILLAGE OF HILBERT - 08136 | ES&S DS200 | ES&S ExpressVote |
| CALUMET COUNTY - 08 | VILLAGE OF POTTER - 08160 | ES&S DS200 | ES&S ExpressVote |
| CALUMET COUNTY - 08 | VILLAGE OF SHERWOOD - 08179 | ES&S DS200 | ES&S ExpressVote |
| CALUMET COUNTY - 08 | VILLAGE OF STOCKBRIDGE - 08181 | ES&S DS200 | ES&S ExpressVote |
| CHIPPEWA COUNTY - 09 | CITY OF BLOOMER - 09206 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | CITY OF CHIPPEWA FALLS - 09211 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | CITY OF CORNELL - 09213 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | CITY OF STANLEY - MAIN - 09281 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF ANSON - 09002 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF ARTHUR - 09004 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF AUBURN - 09006 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF BIRCH CREEK - 09008 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF BLOOMER - 09010 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF CLEVELAND - 09012 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF COLBURN - 09014 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF COOKS VALLEY - 09016 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF DELMAR - 09018 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF EAGLE POINT - 09020 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF EDSON - 09022 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF ESTELLA - 09024 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF GOETZ - 09026 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF HALLIE - 09028 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF HOWARD - 09032 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF LAFAYETTE - 09034 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF LAKE HOLCOMBE - 09035 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF RUBY - 09036 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF SAMPSON - 09038 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF SIGEL - 09040 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF TILDEN - 09042 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF WHEATON - 09044 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | TOWN OF WOODMOHR - 09046 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | VILLAGE OF BOYD - 09106 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | VILLAGE OF CADOTT - 09111 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | VILLAGE OF LAKE HALLIE - 09128 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CHIPPEWA COUNTY - 09 | VILLAGE OF NEW AUBURN - MAIN - 09161 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| CLARK COUNTY - 10 | CITY OF ABBOTSFORD - MAIN - 10201 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | CITY OF COLBY - MAIN - 10211 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | CITY OF GREENWOOD - 10231 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | CITY OF LOYAL - 10246 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | CITY OF NEILLSVILLE - 10261 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | CITY OF OWEN - 10265 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | CITY OF THORP - 10286 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF BEAVER - 10002 | ES&S DS200 | ES&S ExpressVote |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|----------------------|--|--|---|
| CLARK COUNTY - 10 | TOWN OF BUTLER - 10004 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF COLBY - 10006 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF DEWHURST - 10008 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF EATON - 10010 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF FOSTER - 10012 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF FREMONT - 10014 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF GRANT - 10016 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF GREEN GROVE - 10018 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF HENDREN - 10020 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF HEWETT - 10022 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF HIXON - 10024 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF HOARD - 10026 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF LEVIS - 10028 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF LONGWOOD - 10030 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF LOYAL - 10032 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF LYNN - 10034 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF MAYVILLE - 10036 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF MEAD - 10038 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF MENTOR - 10040 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF PINE VALLEY - 10042 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF RESEBURG - 10044 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF SEIF - 10046 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF SHERMAN - 10048 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF SHERWOOD - 10050 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF THORP - 10052 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF UNITY - 10054 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF WARNER - 10056 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF WASHBURN - 10058 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF WESTON - 10060 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF WITHEE - 10062 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF WORDEN - 10064 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | TOWN OF YORK - 10066 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | VILLAGE OF CURTISS - 10111 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | VILLAGE OF DORCHESTER - MAIN - 10116 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | VILLAGE OF GRANTON - 10131 | ES&S DS200 | ES&S ExpressVote |
| CLARK COUNTY - 10 | VILLAGE OF WITHEE - 10191 | ES&S DS200 | ES&S ExpressVote |
| COLUMBIA COUNTY - 11 | CITY OF COLUMBUS - MAIN - 11211 | ES&S DS200 | ES&S ExpressVote |
| COLUMBIA COUNTY - 11 | CITY OF LODI - 11246 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | CITY OF PORTAGE - 11271 | ES&S DS200 | ES&S ExpressVote |
| COLUMBIA COUNTY - 11 | CITY OF WISCONSIN DELLS - MAIN - 11291 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF ARLINGTON - 11002 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF CALEDONIA - 11004 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF COLUMBUS - 11006 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF COURTLAND - 11008 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF DEKORRA - 11010 | ES&S DS200 | ES&S AutoMARK |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|----------------------|-----------------------------------|--|--|
| COLUMBIA COUNTY - 11 | TOWN OF FORT WINNEBAGO - 11012 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF FOUNTAIN PRAIRIE - 11014 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF HAMPDEN - 11016 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF LEEDS - 11018 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF LEWISTON - 11020 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF LODI - 11022 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF LOWVILLE - 11024 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF MARCELLON - 11026 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF NEWPORT - 11028 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF OTSEGO - 11030 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF PACIFIC - 11032 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF RANDOLPH - 11034 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF SCOTT - 11036 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF SPRINGVALE - 11038 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF WEST POINT - 11040 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | TOWN OF WYOCENA - 11042 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | VILLAGE OF ARLINGTON - 11101 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | VILLAGE OF CAMBRIA - 11111 | ES&S DS200 | ES&S ExpressVote |
| COLUMBIA COUNTY - 11 | VILLAGE OF DOYLESTOWN - 11116 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | VILLAGE OF FALL RIVER - 11126 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | VILLAGE OF FRIESLAND - 11127 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | VILLAGE OF PARDEEVILLE - 11171 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | VILLAGE OF POYNETTE - 11172 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | VILLAGE OF RIO - 11177 | ES&S DS200 | ES&S AutoMARK |
| COLUMBIA COUNTY - 11 | VILLAGE OF WYOCENA - 11191 | ES&S DS200 | ES&S AutoMARK |
| CRAWFORD COUNTY - 12 | CITY OF PRAIRIE DU CHIEN - 12271 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| CRAWFORD COUNTY - 12 | TOWN OF BRIDGEPORT - 12002 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| CRAWFORD COUNTY - 12 | TOWN OF CLAYTON - 12004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CRAWFORD COUNTY - 12 | TOWN OF EASTMAN - 12006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CRAWFORD COUNTY - 12 | TOWN OF FREEMAN - 12008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CRAWFORD COUNTY - 12 | TOWN OF HANEY - 12010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CRAWFORD COUNTY - 12 | TOWN OF MARIETTA - 12012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CRAWFORD COUNTY - 12 | TOWN OF PRAIRIE DU CHIEN - 12014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CRAWFORD COUNTY - 12 | TOWN OF SCOTT - 12016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CRAWFORD COUNTY - 12 | TOWN OF SENECA - 12018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CRAWFORD COUNTY - 12 | TOWN OF UTICA - 12020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CRAWFORD COUNTY - 12 | TOWN OF WAUZEKA - 12022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CRAWFORD COUNTY - 12 | VILLAGE OF BELL CENTER - 12106 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CRAWFORD COUNTY - 12 | VILLAGE OF DE SOTO - | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CRAWFORD COUNTY - 12 | VILLAGE OF EASTMAN - 12121 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CRAWFORD COUNTY - 12 | VILLAGE OF FERRYVILLE - 12126 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CRAWFORD COUNTY - 12 | VILLAGE OF GAYS MILLS - 12131 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CRAWFORD COUNTY - 12 | VILLAGE OF LYNXVILLE - 12146 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CRAWFORD COUNTY - 12 | VILLAGE OF MT. STERLING - 12151 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CRAWFORD COUNTY - 12 | VILLAGE OF SOLDIERS GROVE - 12181 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|----------------------|--------------------------------------|--|--|
| CRAWFORD COUNTY - 12 | VILLAGE OF STEUBEN - 12182 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| CRAWFORD COUNTY - 12 | VILLAGE OF WAUZEKA - 12191 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DANE COUNTY - 13 | CITY OF FITCHBURG - 13225 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | CITY OF MADISON - 13251 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | CITY OF MIDDLETON - 13255 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | CITY OF MONONA - 13258 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | CITY OF STOUGHTON - 13281 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | CITY OF SUN PRAIRIE - 13282 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | CITY OF VERONA - 13286 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF ALBION - 13002 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF BERRY - 13004 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF BLACK EARTH - 13006 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF BLOOMING GROVE - 13008 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF BLUE MOUNDS - 13010 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF BRISTOL - 13012 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF BURKE - 13014 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF CHRISTIANA - 13016 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF COTTAGE GROVE - 13018 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF CROSS PLAINS - 13020 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF DANE - 13022 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF DEERFIELD - 13024 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF DUNKIRK - 13026 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF DUNN - 13028 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF MADISON - 13032 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF MAZOMANIE - 13034 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF MEDINA - 13036 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF MIDDLETON - 13038 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF MONTROSE - 13040 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF OREGON - 13042 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF PERRY - 13044 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF PLEASANT SPRINGS - 13046 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF PRIMROSE - 13048 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF ROXBURY - 13050 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF RUTLAND - 13052 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF SPRINGDALE - 13054 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF SPRINGFIELD - 13056 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF SUN PRAIRIE - 13058 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF VERMONT - 13060 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF VERONA - 13062 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF VIENNA - 13064 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF WESTPORT - 13066 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF WINDSOR - 13068 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | TOWN OF YORK - 13070 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | VILLAGE OF BELLEVILLE - MAIN - 13106 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | VILLAGE OF BLACK EARTH - 13107 | ES&S DS200 | ES&S ExpressVote |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-------------------|-------------------------------------|--|---|
| DANE COUNTY - 13 | VILLAGE OF BLUE MOUNDS - 13108 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | VILLAGE OF BROOKLYN - MAIN - 13109 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | VILLAGE OF CAMBRIDGE - MAIN - 13111 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | VILLAGE OF COTTAGE GROVE - 13112 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | VILLAGE OF CROSS PLAINS - 13113 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | VILLAGE OF DANE - 13116 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | VILLAGE OF DEERFIELD - 13117 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | VILLAGE OF DEFOREST - 13118 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | VILLAGE OF MAPLE BLUFF - 13151 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | VILLAGE OF MARSHALL - 13152 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | VILLAGE OF MAZOMANIE - 13153 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | VILLAGE OF MCFARLAND - 13154 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | VILLAGE OF MOUNT HOREB - 13157 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | VILLAGE OF OREGON - 13165 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | VILLAGE OF ROCKDALE - 13176 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | VILLAGE OF SHOREWOOD HILLS - 13181 | ES&S DS200 | ES&S ExpressVote |
| DANE COUNTY - 13 | VILLAGE OF WAUNAKEE - 13191 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | CITY OF BEAVER DAM - 14206 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | CITY OF FOX LAKE - 14226 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | CITY OF HORICON - 14236 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | CITY OF JUNEAU - 14241 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | CITY OF MAYVILLE - 14251 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | CITY OF WAUPUN - MAIN - 14292 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF ASHIPUN - 14002 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF BEAVER DAM - 14004 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF BURNETT - 14006 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF CALAMUS - 14008 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF CHESTER - 14010 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF CLYMAN - 14012 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF ELBA - 14014 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF EMMET - 14016 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF FOX LAKE - 14018 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF HERMAN - 14020 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF HUBBARD - 14022 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF HUSTISFORD - 14024 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF LEBANON - 14026 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF LEROY - 14028 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF LOMIRA - 14030 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF LOWELL - 14032 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF OAK GROVE - 14034 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF PORTLAND - 14036 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF RUBICON - 14038 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF SHIELDS - 14040 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF THERESA - 14042 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF TRENTON - 14044 | ES&S DS200 | ES&S ExpressVote |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|----------------------------------|------------------------------------|--|---|
| DODGE COUNTY - 14 | TOWN OF WESTFORD - 14046 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | TOWN OF WILLIAMSTOWN - 14048 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | VILLAGE OF BROWNSVILLE - 14106 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | VILLAGE OF CLYMAN - 14111 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | VILLAGE OF HUSTISFORD - 14136 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | VILLAGE OF IRON RIDGE - 14141 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | VILLAGE OF KEKOSKEE - 14143 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | VILLAGE OF LOMIRA - 14146 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | VILLAGE OF LOWELL - 14147 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | VILLAGE OF NEOSHO - 14161 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | VILLAGE OF RANDOLPH - MAIN - 14176 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | VILLAGE OF REESEVILLE - 14177 | ES&S DS200 | ES&S ExpressVote |
| DODGE COUNTY - 14 | VILLAGE OF THERESA - 14186 | ES&S DS200 | ES&S ExpressVote |
| DOOR COUNTY - 15 | CITY OF STURGEON BAY - 15281 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOOR COUNTY - 15 | TOWN OF BAILEYS HARBOR - 15002 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOOR COUNTY - 15 | TOWN OF BRUSSELS - 15004 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOOR COUNTY - 15 | TOWN OF CLAY BANKS - 15006 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOOR COUNTY - 15 | TOWN OF EGG HARBOR - 15008 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOOR COUNTY - 15 | TOWN OF FORESTVILLE - 15010 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOOR COUNTY - 15 | TOWN OF GARDNER - 15012 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOOR COUNTY - 15 | TOWN OF GIBRALTAR - 15014 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOOR COUNTY - 15 | TOWN OF JACKSONPORT - 15016 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOOR COUNTY - 15 | TOWN OF LIBERTY GROVE - 15018 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOOR COUNTY - 15 | TOWN OF NASEWAUPEE - 15020 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOOR COUNTY - 15 | TOWN OF SEVASTOPOL - 15022 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOOR COUNTY - 15 | TOWN OF STURGEON BAY - 15024 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOOR COUNTY - 15 | TOWN OF UNION - 15026 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOOR COUNTY - 15 | TOWN OF WASHINGTON - 15028 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOOR COUNTY - 15 | VILLAGE OF EGG HARBOR - 15118 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOOR COUNTY - 15 | VILLAGE OF EPHRAIM - 15121 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOOR COUNTY - 15 | VILLAGE OF FORESTVILLE - 15127 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOOR COUNTY - 15 | VILLAGE OF SISTER BAY - 15181 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| DOUGLAS COUNTY - 16 as of 8/2018 | CITY OF SUPERIOR - 16281 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | TOWN OF AMNICON - 16002 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | TOWN OF BENNETT - 16004 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | TOWN OF BRULE - 16006 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | TOWN OF CLOVERLAND - 16008 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | TOWN OF DAIRYLAND - 16010 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | TOWN OF GORDON - 16012 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | TOWN OF HAWTHORNE - 16014 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | TOWN OF HIGHLAND - 16016 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | TOWN OF LAKESIDE - 16018 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | TOWN OF MAPLE - 16020 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | TOWN OF OAKLAND - 16022 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | TOWN OF PARKLAND - 16024 | ES&S DS200 | ES&S ExpressVote |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|------------------------|-----------------------------------|--|--|
| DOUGLAS COUNTY - 16 | TOWN OF SOLON SPRINGS - 16026 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | TOWN OF SUMMIT - 16028 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | TOWN OF SUPERIOR - 16030 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | TOWN OF WASCOTT - 16032 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | VILLAGE OF LAKE NEBAGAMON - 16146 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | VILLAGE OF OLIVER - 16165 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | VILLAGE OF POPLAR - 16171 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | VILLAGE OF SOLON SPRINGS - 16181 | ES&S DS200 | ES&S ExpressVote |
| DOUGLAS COUNTY - 16 | VILLAGE OF SUPERIOR - 16182 | ES&S DS200 | ES&S ExpressVote |
| DUNN COUNTY - 17 | CITY OF MENOMONIE - 17251 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF COLFAX - 17002 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF DUNN - 17004 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF EAU GALLE - 17006 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF ELK MOUND - 17008 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF GRANT - 17010 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF HAY RIVER - 17012 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF LUCAS - 17014 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF MENOMONIE - 17016 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF NEW HAVEN - 17018 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF OTTER CREEK - 17020 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF PERU - 17022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF RED CEDAR - 17024 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF ROCK CREEK - 17026 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF SAND CREEK - 17028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF SHERIDAN - 17030 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF SHERMAN - 17032 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF SPRING BROOK - 17034 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF STANTON - 17036 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF TAINTER - 17038 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF TIFFANY - 17040 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF WESTON - 17042 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | TOWN OF WILSON - 17044 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | VILLAGE OF BOYCEVILLE - 17106 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | VILLAGE OF COLFAX - 17111 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | VILLAGE OF DOWNING - 17116 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | VILLAGE OF ELK MOUND - 17121 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | VILLAGE OF KNAPP - 17141 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | VILLAGE OF RIDGELAND - 17176 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| DUNN COUNTY - 17 | VILLAGE OF WHEELER - 17191 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| EAU CLAIRE COUNTY - 18 | CITY OF ALTOONA - 18201 | ES&S DS200 | ES&S ExpressVote |
| EAU CLAIRE COUNTY - 18 | CITY OF AUGUSTA - 18202 | ES&S DS200 | ES&S ExpressVote |
| EAU CLAIRE COUNTY - 18 | CITY OF EAU CLAIRE - MAIN - 18221 | ES&S DS200 | ES&S ExpressVote |
| EAU CLAIRE COUNTY - 18 | TOWN OF BRIDGE CREEK - 18002 | ES&S DS200 | ES&S ExpressVote |
| EAU CLAIRE COUNTY - 18 | TOWN OF BRUNSWICK - 18004 | ES&S DS200 | ES&S ExpressVote |
| EAU CLAIRE COUNTY - 18 | TOWN OF CLEAR CREEK - 18006 | ES&S DS200 | ES&S ExpressVote |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-------------------------|---------------------------------|--|--|
| EAU CLAIRE COUNTY - 18 | TOWN OF DRAMMEN - 18008 | ES&S DS200 | ES&S ExpressVote |
| EAU CLAIRE COUNTY - 18 | TOWN OF FAIRCHILD - 18010 | ES&S DS200 | ES&S ExpressVote |
| EAU CLAIRE COUNTY - 18 | TOWN OF LINCOLN - 18012 | ES&S DS200 | ES&S ExpressVote |
| EAU CLAIRE COUNTY - 18 | TOWN OF LUDINGTON - 18014 | ES&S DS200 | ES&S ExpressVote |
| EAU CLAIRE COUNTY - 18 | TOWN OF OTTER CREEK - 18016 | ES&S DS200 | ES&S ExpressVote |
| EAU CLAIRE COUNTY - 18 | TOWN OF PLEASANT VALLEY - 18018 | ES&S DS200 | ES&S ExpressVote |
| EAU CLAIRE COUNTY - 18 | TOWN OF SEYMOUR - 18020 | ES&S DS200 | ES&S ExpressVote |
| EAU CLAIRE COUNTY - 18 | TOWN OF UNION - 18022 | ES&S DS200 | ES&S ExpressVote |
| EAU CLAIRE COUNTY - 18 | TOWN OF WASHINGTON - 18024 | ES&S DS200 | ES&S ExpressVote |
| EAU CLAIRE COUNTY - 18 | TOWN OF WILSON - 18026 | ES&S DS200 | ES&S ExpressVote |
| EAU CLAIRE COUNTY - 18 | VILLAGE OF FAIRCHILD - 18126 | ES&S DS200 | ES&S ExpressVote |
| EAU CLAIRE COUNTY - 18 | VILLAGE OF FALL CREEK - 18127 | ES&S DS200 | ES&S ExpressVote |
| FLORENCE COUNTY - 19 | TOWN OF AURORA - 19002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FLORENCE COUNTY - 19 | TOWN OF COMMONWEALTH - 19004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FLORENCE COUNTY - 19 | TOWN OF FENCE - 19006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FLORENCE COUNTY - 19 | TOWN OF FERN - 19008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FLORENCE COUNTY - 19 | TOWN OF FLORENCE - 19010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FLORENCE COUNTY - 19 | TOWN OF HOMESTEAD - 19012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FLORENCE COUNTY - 19 | TOWN OF LONG LAKE - 19014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FLORENCE COUNTY - 19 | TOWN OF TIPLER - 19016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FOND DU LAC COUNTY - 20 | CITY OF FOND DU LAC - 20226 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | CITY OF RIPON - 20276 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | CITY OF WAUPUN - 14292 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF ALTO - 20002 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF ASHFORD - 20004 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF AUBURN - 20006 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF BYRON - 20008 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF CALUMET - 20010 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF EDEN - 20012 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF ELDORADO - 20014 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF EMPIRE - 20016 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF FOND DU LAC - 20018 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF FOREST - 20020 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF FRIENDSHIP - 20022 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF LAMARTINE - 20024 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF MARSHFIELD - 20026 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF METOMEN - 20028 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF OAKFIELD - 20030 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF OSCEOLA - 20032 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF RIPON - 20034 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF ROSENDALE - 20036 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF SPRINGVALE - 20038 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF TAYCHEEDAH - 20040 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | TOWN OF WAUPUN - 20042 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | VILLAGE OF BRANDON - 20106 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-------------------------|--------------------------------------|--|--|
| FOND DU LAC COUNTY - 20 | VILLAGE OF CAMPBELLSPORT - 20111 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | VILLAGE OF EDEN - 20121 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | VILLAGE OF FAIRWATER - 20126 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | VILLAGE OF MOUNT CALVARY - 20151 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | VILLAGE OF NORTH FOND DU LAC - 20161 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | VILLAGE OF OAKFIELD - 20165 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | VILLAGE OF ROSENDALE - 20176 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOND DU LAC COUNTY - 20 | VILLAGE OF ST. CLOUD - 20181 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| FOREST COUNTY - 21 | CITY OF CRANDON - 21211 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FOREST COUNTY - 21 | TOWN OF ALVIN - 21002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FOREST COUNTY - 21 | TOWN OF ARGONNE - 21004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FOREST COUNTY - 21 | TOWN OF ARMSTRONG CREEK - 21006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FOREST COUNTY - 21 | TOWN OF BLACKWELL - 21008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FOREST COUNTY - 21 | TOWN OF CASWELL - 21010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FOREST COUNTY - 21 | TOWN OF CRANDON - 21012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FOREST COUNTY - 21 | TOWN OF FREEDOM - 21014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FOREST COUNTY - 21 | TOWN OF HILES - 21016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FOREST COUNTY - 21 | TOWN OF LAONA - 21018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FOREST COUNTY - 21 | TOWN OF LINCOLN - 21020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FOREST COUNTY - 21 | TOWN OF NASHVILLE - 21022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FOREST COUNTY - 21 | TOWN OF POPPLE RIVER - 21024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FOREST COUNTY - 21 | TOWN OF ROSS - 21026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| FOREST COUNTY - 21 | TOWN OF WABENO - 21028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | CITY OF BOSCOBEL - 22206 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GRANT COUNTY - 22 | CITY OF CUBA CITY - MAIN - 22211 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GRANT COUNTY - 22 | CITY OF FENNIMORE - 22226 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GRANT COUNTY - 22 | CITY OF LANCASTER - 22246 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GRANT COUNTY - 22 | CITY OF PLATTEVILLE - 22271 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GRANT COUNTY - 22 | TOWN OF BEETOWN - 22002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF BLOOMINGTON - 22004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF BOSCOBEL - 22006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF CASSVILLE - 22008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF CASTLE ROCK - 22010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF CLIFTON - 22012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF ELLENBORO - 22014 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GRANT COUNTY - 22 | TOWN OF FENNIMORE - 22016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF GLEN HAVEN - 22018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF HARRISON - 22020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF HAZEL GREEN - 22022 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GRANT COUNTY - 22 | TOWN OF HICKORY GROVE - 22024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF JAMESTOWN - 22026 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GRANT COUNTY - 22 | TOWN OF LIBERTY - 22028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF LIMA - 22030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF LITTLE GRANT - 22032 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF MARION - 22034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-------------------|---------------------------------------|--|--|
| GRANT COUNTY - 22 | TOWN OF MILLVILLE - 22036 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF MOUNT HOPE - 22038 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF MOUNT IDA - 22040 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF MUSCODA - 22042 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF NORTH LANCASTER - 22044 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF PARIS - 22046 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF PATCH GROVE - 22048 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF PLATTEVILLE - 22050 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GRANT COUNTY - 22 | TOWN OF POTOSI - 22052 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GRANT COUNTY - 22 | TOWN OF SMELSER - 22054 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GRANT COUNTY - 22 | TOWN OF SOUTH LANCASTER - 22056 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GRANT COUNTY - 22 | TOWN OF WATERLOO - 22058 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF WATTERSTOWN - 22060 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF WINGVILLE - 22062 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF WOODMAN - 22064 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | TOWN OF WYALUSING - 22066 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | VILLAGE OF BAGLEY - 22106 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | VILLAGE OF BLOOMINGTON - 22107 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | VILLAGE OF BLUE RIVER - 22108 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | VILLAGE OF CASSVILLE - 22111 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | VILLAGE OF DICKEYVILLE - 22116 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GRANT COUNTY - 22 | VILLAGE OF HAZEL GREEN - MAIN - 22136 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GRANT COUNTY - 22 | VILLAGE OF LIVINGSTON - MAIN - 22147 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GRANT COUNTY - 22 | VILLAGE OF MONTFORT - MAIN - 22151 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GRANT COUNTY - 22 | VILLAGE OF MOUNT HOPE - 22152 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GRANT COUNTY - 22 | VILLAGE OF MUSCODA - MAIN - 22153 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GRANT COUNTY - 22 | VILLAGE OF PATCH GROVE - 22171 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | VILLAGE OF POTOSI - 22172 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | VILLAGE OF TENNYSON - 22186 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GRANT COUNTY - 22 | VILLAGE OF WOODMAN - 22191 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GREEN COUNTY - 23 | CITY OF BRODHEAD - MAIN - 23206 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | CITY OF MONROE - 23251 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | TOWN OF ADAMS - 23002 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | TOWN OF ALBANY - 23004 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | TOWN OF BROOKLYN - 23006 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | TOWN OF CADIZ - 23008 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | TOWN OF CLARNO - 23010 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | TOWN OF DECATUR - 23012 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | TOWN OF EXETER - 23014 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | TOWN OF JEFFERSON - 23016 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | TOWN OF JORDAN - 23018 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | TOWN OF MONROE - 23020 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | TOWN OF MOUNT PLEASANT - 23022 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | TOWN OF NEW GLARUS - 23024 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | TOWN OF SPRING GROVE - 23026 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|------------------------|-------------------------------|--|--|
| GREEN COUNTY - 23 | TOWN OF SYLVESTER - 23028 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | TOWN OF WASHINGTON - 23030 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | TOWN OF YORK - 23032 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | VILLAGE OF ALBANY - 23101 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | VILLAGE OF BROWNTOWN - 23110 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | VILLAGE OF MONTICELLO - 23151 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN COUNTY - 23 | VILLAGE OF NEW GLARUS - 23161 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| GREEN LAKE COUNTY - 24 | CITY OF BERLIN - MAIN - 24206 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GREEN LAKE COUNTY - 24 | CITY OF GREEN LAKE - 24231 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GREEN LAKE COUNTY - 24 | CITY OF MARKESAN - 24251 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GREEN LAKE COUNTY - 24 | CITY OF PRINCETON - 24271 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GREEN LAKE COUNTY - 24 | TOWN OF BERLIN - 24002 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GREEN LAKE COUNTY - 24 | TOWN OF BROOKLYN - 24004 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GREEN LAKE COUNTY - 24 | TOWN OF GREEN LAKE - 24006 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GREEN LAKE COUNTY - 24 | TOWN OF KINGSTON - 24008 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GREEN LAKE COUNTY - 24 | TOWN OF MACKFORD - 24010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GREEN LAKE COUNTY - 24 | TOWN OF MANCHESTER - 24012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GREEN LAKE COUNTY - 24 | TOWN OF MARQUETTE - 24014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GREEN LAKE COUNTY - 24 | TOWN OF PRINCETON - 24016 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GREEN LAKE COUNTY - 24 | TOWN OF SENECA - 24020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GREEN LAKE COUNTY - 24 | TOWN OF ST. MARIE - 24018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GREEN LAKE COUNTY - 24 | VILLAGE OF KINGSTON - 24141 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| GREEN LAKE COUNTY - 24 | VILLAGE OF MARQUETTE - 24154 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | CITY OF DODGEVILLE - 25216 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | CITY OF MINERAL POINT - 25251 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | TOWN OF ARENA - 25002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | TOWN OF BRIGHAM - 25004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | TOWN OF CLYDE - 25006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | TOWN OF DODGEVILLE - 25008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | TOWN OF EDEN - 25010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | TOWN OF HIGHLAND - 25012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | TOWN OF LINDEN - 25014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | TOWN OF MIFFLIN - 25016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | TOWN OF MINERAL POINT - 25018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | TOWN OF MOSCOW - 25020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | TOWN OF PULASKI - 25022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | TOWN OF RIDGEWAY - 25024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | TOWN OF WALDWICK - 25026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | TOWN OF WYOMING - 25028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | VILLAGE OF ARENA - 25101 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | VILLAGE OF AVOCA - 25102 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | VILLAGE OF BARNEVELD - 25106 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | VILLAGE OF COBB - 25111 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | VILLAGE OF HIGHLAND - 25136 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | VILLAGE OF HOLLANDALE - 25137 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-----------------------|-----------------------------------|--|--|
| IOWA COUNTY - 25 | VILLAGE OF LINDEN - 25146 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | VILLAGE OF REWEY - 25176 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IOWA COUNTY - 25 | VILLAGE OF RIDGEWAY - 25177 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IRON COUNTY - 26 | CITY OF HURLEY - 26236 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IRON COUNTY - 26 | CITY OF MONTREAL - 26251 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IRON COUNTY - 26 | TOWN OF ANDERSON - 26002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IRON COUNTY - 26 | TOWN OF CAREY - 26004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IRON COUNTY - 26 | TOWN OF GURNEY - 26006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IRON COUNTY - 26 | TOWN OF KIMBALL - 26008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IRON COUNTY - 26 | TOWN OF KNIGHT - 26010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IRON COUNTY - 26 | TOWN OF MERCER - 26012 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IRON COUNTY - 26 | TOWN OF OMA - 26014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IRON COUNTY - 26 | TOWN OF PENCE - 26016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IRON COUNTY - 26 | TOWN OF SAXON - 26018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| IRON COUNTY - 26 | TOWN OF SHERMAN - 26020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | CITY OF BLACK RIVER FALLS - 27206 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF ADAMS - 27002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF ALBION - 27004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF ALMA - 27006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF BEAR BLUFF - 27008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF BROCKWAY - 27010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF CITY POINT - 27012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF CLEVELAND - 27014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF CURRAN - 27016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF FRANKLIN - 27018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF GARDEN VALLEY - 27020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF GARFIELD - 27022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF HIXTON - 27024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF IRVING - 27026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF KNAPP - 27028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF KOMENSKY - 27030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF MANCHESTER - 27032 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF MELROSE - 27034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF MILLSTON - 27036 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF NORTH BEND - 27038 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF NORTHFIELD - 27040 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | TOWN OF SPRINGFIELD - 27042 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | VILLAGE OF ALMA CENTER - 27101 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | VILLAGE OF HIXTON - 27136 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | VILLAGE OF MELROSE - 27151 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | VILLAGE OF MERRILLAN - 27152 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JACKSON COUNTY - 27 | VILLAGE OF TAYLOR - 27186 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JEFFERSON COUNTY - 28 | CITY OF FORT ATKINSON - 28226 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | CITY OF JEFFERSON - 28241 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | CITY OF LAKE MILLS - 28246 | ES&S DS200 | ES&S ExpressVote |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-----------------------|----------------------------------|--|--|
| JEFFERSON COUNTY - 28 | CITY OF WATERLOO - 28290 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | CITY OF WATERTOWN - MAIN - 28291 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | TOWN OF AZTALAN - 28002 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | TOWN OF COLD SPRING - 28004 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | TOWN OF CONCORD - 28006 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | TOWN OF FARMINGTON - 28008 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | TOWN OF HEBRON - 28010 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | TOWN OF IXONIA - 28012 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | TOWN OF JEFFERSON - 28014 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | TOWN OF KOSHKONONG - 28016 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | TOWN OF LAKE MILLS - 28018 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | TOWN OF MILFORD - 28020 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | TOWN OF OAKLAND - 28022 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | TOWN OF PALMYRA - 28024 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | TOWN OF SULLIVAN - 28026 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | TOWN OF SUMNER - 28028 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | TOWN OF WATERLOO - 28030 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | TOWN OF WATERTOWN - 28032 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | VILLAGE OF JOHNSON CREEK - 28141 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | VILLAGE OF PALMYRA - 28171 | ES&S DS200 | ES&S ExpressVote |
| JEFFERSON COUNTY - 28 | VILLAGE OF SULLIVAN - 28181 | ES&S DS200 | ES&S ExpressVote |
| JUNEAU COUNTY - 29 | CITY OF ELROY - 29221 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | CITY OF MAUSTON - 29251 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | CITY OF NEW LISBON - 29261 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | TOWN OF ARMENIA - 29002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | TOWN OF CLEARFIELD - 29004 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| JUNEAU COUNTY - 29 | TOWN OF CUTLER - 29006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | TOWN OF FINLEY - 29008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | TOWN OF FOUNTAIN - 29010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | TOWN OF GERMANTOWN - 29012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | TOWN OF KILDARE - 29014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | TOWN OF KINGSTON - 29016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | TOWN OF LEMONWEIR - 29018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | TOWN OF LINDINA - 29020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | TOWN OF LISBON - 29022 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| JUNEAU COUNTY - 29 | TOWN OF LYNDON - 29024 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| JUNEAU COUNTY - 29 | TOWN OF MARION - 29026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | TOWN OF NECEDAH - 29028 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| JUNEAU COUNTY - 29 | TOWN OF ORANGE - 29030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | TOWN OF PLYMOUTH - 29032 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | TOWN OF SEVEN MILE CREEK - 29034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | TOWN OF SUMMIT - 29036 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | TOWN OF WONEWOC - 29038 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | VILLAGE OF CAMP DOUGLAS - 29111 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | VILLAGE OF HUSTLER - 29136 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-----------------------|-------------------------------------|--|--|
| JUNEAU COUNTY - 29 | VILLAGE OF LYNDON STATION - 29146 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | VILLAGE OF NECEDAH - 29161 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| JUNEAU COUNTY - 29 | VILLAGE OF UNION CENTER - 29186 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| JUNEAU COUNTY - 29 | VILLAGE OF WONEWOC - 29191 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| KENOSHA COUNTY - 30 | CITY OF KENOSHA - 30241 | ES&S DS200 | ES&S ExpressVote |
| KENOSHA COUNTY - 30 | TOWN OF BRIGHTON - 30002 | ES&S DS200 | ES&S ExpressVote |
| KENOSHA COUNTY - 30 | TOWN OF PARIS - 30006 | ES&S DS200 | ES&S ExpressVote |
| KENOSHA COUNTY - 30 | TOWN OF RANDALL - 30010 | ES&S DS200 | ES&S ExpressVote |
| KENOSHA COUNTY - 30 | TOWN OF SALEM - 30012 | ES&S DS200 | ES&S ExpressVote |
| KENOSHA COUNTY - 30 | TOWN OF SOMERS - 30014 | ES&S DS200 | ES&S ExpressVote |
| KENOSHA COUNTY - 30 | TOWN OF WHEATLAND - 30016 | ES&S DS200 | ES&S ExpressVote |
| KENOSHA COUNTY - 30 | VILLAGE OF BRISTOL - 30104 | ES&S DS200 | ES&S ExpressVote |
| KENOSHA COUNTY - 30 | VILLAGE OF PADDOCK LAKE - 30171 | ES&S DS200 | ES&S ExpressVote |
| KENOSHA COUNTY - 30 | VILLAGE OF PLEASANT PRAIRIE - 30174 | ES&S DS200 | ES&S ExpressVote |
| KENOSHA COUNTY - 30 | VILLAGE OF SILVER LAKE - 30181 | ES&S DS200 | ES&S ExpressVote |
| KENOSHA COUNTY - 30 | VILLAGE OF SOMERS - 30182 | ES&S DS200 | ES&S ExpressVote |
| KENOSHA COUNTY - 30 | VILLAGE OF TWIN LAKES - 30186 | ES&S DS200 | ES&S ExpressVote |
| KEWAUNEE COUNTY - 31 | CITY OF ALGOMA - 31201 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| KEWAUNEE COUNTY - 31 | CITY OF KEWAUNEE - 31241 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| KEWAUNEE COUNTY - 31 | TOWN OF AHNAPEE - 31002 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| KEWAUNEE COUNTY - 31 | TOWN OF CARLTON - 31004 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| KEWAUNEE COUNTY - 31 | TOWN OF CASCO - 31006 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| KEWAUNEE COUNTY - 31 | TOWN OF FRANKLIN - 31008 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| KEWAUNEE COUNTY - 31 | TOWN OF LINCOLN - 31010 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| KEWAUNEE COUNTY - 31 | TOWN OF LUXEMBURG - 31012 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| KEWAUNEE COUNTY - 31 | TOWN OF MONTPELIER - 31014 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| KEWAUNEE COUNTY - 31 | TOWN OF PIERCE - 31016 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| KEWAUNEE COUNTY - 31 | TOWN OF RED RIVER - 31018 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| KEWAUNEE COUNTY - 31 | TOWN OF WEST KEWAUNEE - 31020 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| KEWAUNEE COUNTY - 31 | VILLAGE OF CASCO - 31111 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| KEWAUNEE COUNTY - 31 | VILLAGE OF LUXEMBURG - 31146 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LA CROSSE COUNTY - 32 | CITY OF LA CROSSE - 32246 | ES&S DS200 | ES&S AutoMARK |
| LA CROSSE COUNTY - 32 | CITY OF ONALASKA - 32265 | ES&S DS200 | ES&S AutoMARK |
| LA CROSSE COUNTY - 32 | TOWN OF BANGOR - 32002 | ES&S DS200 | ES&S AutoMARK |
| LA CROSSE COUNTY - 32 | TOWN OF BARRE - 32004 | ES&S DS200 | ES&S AutoMARK |
| LA CROSSE COUNTY - 32 | TOWN OF BURNS - 32006 | ES&S DS200 | ES&S AutoMARK |
| LA CROSSE COUNTY - 32 | TOWN OF CAMPBELL - 32008 | ES&S DS200 | ES&S AutoMARK |
| LA CROSSE COUNTY - 32 | TOWN OF FARMINGTON - 32010 | ES&S DS200 | ES&S AutoMARK |
| LA CROSSE COUNTY - 32 | TOWN OF GREENFIELD - 32012 | ES&S DS200 | ES&S AutoMARK |
| LA CROSSE COUNTY - 32 | TOWN OF HAMILTON - 32014 | ES&S DS200 | ES&S AutoMARK |
| LA CROSSE COUNTY - 32 | TOWN OF HOLLAND - 32016 | ES&S DS200 | ES&S AutoMARK |
| LA CROSSE COUNTY - 32 | TOWN OF MEDARY - 32018 | ES&S DS200 | ES&S AutoMARK |
| LA CROSSE COUNTY - 32 | TOWN OF ONALASKA - 32020 | ES&S DS200 | ES&S AutoMARK |
| LA CROSSE COUNTY - 32 | TOWN OF SHELBY - 32022 | ES&S DS200 | ES&S AutoMARK |
| LA CROSSE COUNTY - 32 | TOWN OF WASHINGTON - 32024 | ES&S DS200 | ES&S AutoMARK |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-----------------------|--|--|--|
| LA CROSSE COUNTY - 32 | VILLAGE OF BANGOR - 32106 | ES&S DS200 | ES&S AutoMARK |
| LA CROSSE COUNTY - 32 | VILLAGE OF HOLMEN - 32136 | ES&S DS200 | ES&S AutoMARK |
| LA CROSSE COUNTY - 32 | VILLAGE OF ROCKLAND - 32176 | ES&S DS200 | ES&S AutoMARK |
| LA CROSSE COUNTY - 32 | VILLAGE OF WEST SALEM - 32191 | ES&S DS200 | ES&S AutoMARK |
| LAFAYETTE COUNTY - 33 | CITY OF DARLINGTON - 33216 | ES&S DS200 | ES&S AutoMARK |
| LAFAYETTE COUNTY - 33 | CITY OF SHULLSBURG - 33281 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | TOWN OF ARGYLE - 33002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | TOWN OF BELMONT - 33004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | TOWN OF BENTON - 33006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | TOWN OF BLANCHARD - 33008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | TOWN OF DARLINGTON - 33010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | TOWN OF ELK GROVE - 33012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | TOWN OF FAYETTE - 33014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | TOWN OF GRATIOT - 33016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | TOWN OF KENDALL - 33018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | TOWN OF LAMONT - 33020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | TOWN OF MONTICELLO - 33022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | TOWN OF NEW DIGGINGS - 33024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | TOWN OF SEYMOUR - 33026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | TOWN OF SHULLSBURG - 33028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | TOWN OF WAYNE - 33030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | TOWN OF WHITE OAK SPRINGS - 33032 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | TOWN OF WILLOW SPRINGS - 33034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | TOWN OF WIOTA - 33036 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | VILLAGE OF ARGYLE - 33101 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | VILLAGE OF BELMONT - 33106 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | VILLAGE OF BENTON - 33107 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | VILLAGE OF BLANCHARDVILLE - MAIN - 33108 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | VILLAGE OF GRATIOT - 33131 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LAFAYETTE COUNTY - 33 | VILLAGE OF SOUTH WAYNE - 33181 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LANGLADE COUNTY - 34 | CITY OF ANTIGO - 34201 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LANGLADE COUNTY - 34 | TOWN OF ACKLEY - 34002 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LANGLADE COUNTY - 34 | TOWN OF AINSWORTH - 34004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LANGLADE COUNTY - 34 | TOWN OF ANTIGO - 34006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LANGLADE COUNTY - 34 | TOWN OF ELCHO - 34008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LANGLADE COUNTY - 34 | TOWN OF EVERGREEN - 34010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LANGLADE COUNTY - 34 | TOWN OF LANGLADE - 34012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LANGLADE COUNTY - 34 | TOWN OF NEVA - 34014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LANGLADE COUNTY - 34 | TOWN OF NORWOOD - 34016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LANGLADE COUNTY - 34 | TOWN OF PARRISH - 34018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LANGLADE COUNTY - 34 | TOWN OF PECK - 34020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LANGLADE COUNTY - 34 | TOWN OF POLAR - 34022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LANGLADE COUNTY - 34 | TOWN OF PRICE - 34024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LANGLADE COUNTY - 34 | TOWN OF ROLLING - 34026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LANGLADE COUNTY - 34 | TOWN OF SUMMIT - 34028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-----------------------|----------------------------------|--|--|
| LANGLADE COUNTY - 34 | TOWN OF UPHAM - 34030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LANGLADE COUNTY - 34 | TOWN OF VILAS - 34032 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LANGLADE COUNTY - 34 | TOWN OF WOLF RIVER - 34034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LANGLADE COUNTY - 34 | VILLAGE OF WHITE LAKE - 34191 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LINCOLN COUNTY - 35 | CITY OF MERRILL - 35251 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| LINCOLN COUNTY - 35 | CITY OF TOMAHAWK - 35286 | ES&S DS200 | ES&S AutoMARK |
| LINCOLN COUNTY - 35 | TOWN OF BIRCH - 35002 | ES&S DS200 | ES&S AutoMARK |
| LINCOLN COUNTY - 35 | TOWN OF BRADLEY - 35004 | ES&S DS200 | ES&S AutoMARK |
| LINCOLN COUNTY - 35 | TOWN OF CORNING - 35006 | ES&S DS200 | ES&S AutoMARK |
| LINCOLN COUNTY - 35 | TOWN OF HARDING - 35008 | ES&S DS200 | ES&S AutoMARK |
| LINCOLN COUNTY - 35 | TOWN OF HARRISON - 35010 | ES&S DS200 | ES&S AutoMARK |
| LINCOLN COUNTY - 35 | TOWN OF KING - 35012 | ES&S DS200 | ES&S AutoMARK |
| LINCOLN COUNTY - 35 | TOWN OF MERRILL - 35014 | ES&S DS200 | ES&S AutoMARK |
| LINCOLN COUNTY - 35 | TOWN OF PINE RIVER - 35016 | ES&S DS200 | ES&S AutoMARK |
| LINCOLN COUNTY - 35 | TOWN OF ROCK FALLS - 35018 | ES&S DS200 | ES&S AutoMARK |
| LINCOLN COUNTY - 35 | TOWN OF RUSSELL - 35020 | ES&S DS200 | ES&S AutoMARK |
| LINCOLN COUNTY - 35 | TOWN OF SCHLEY - 35022 | ES&S DS200 | ES&S AutoMARK |
| LINCOLN COUNTY - 35 | TOWN OF SCOTT - 35024 | ES&S DS200 | ES&S AutoMARK |
| LINCOLN COUNTY - 35 | TOWN OF SKANAWAN - 35026 | ES&S DS200 | ES&S AutoMARK |
| LINCOLN COUNTY - 35 | TOWN OF SOMO - 35028 | ES&S DS200 | ES&S AutoMARK |
| LINCOLN COUNTY - 35 | TOWN OF TOMAHAWK - 35030 | ES&S DS200 | ES&S AutoMARK |
| LINCOLN COUNTY - 35 | TOWN OF WILSON - 35032 | ES&S DS200 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | CITY OF KIEL - MAIN - 36241 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | CITY OF MANITOWOC - 36251 | ES&S DS200 | ES&S ExpressVote |
| MANITOWOC COUNTY - 36 | CITY OF TWO RIVERS - 36286 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | TOWN OF CATO - 36002 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | TOWN OF CENTERVILLE - 36004 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | TOWN OF COOPERSTOWN - 36006 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | TOWN OF EATON - 36008 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | TOWN OF FRANKLIN - 36010 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | TOWN OF GIBSON - 36012 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | TOWN OF KOSSUTH - 36014 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | TOWN OF LIBERTY - 36016 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | TOWN OF MANITOWOC - 36018 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | TOWN OF MANITOWOC RAPIDS - 36020 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | TOWN OF MAPLE GROVE - 36022 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | TOWN OF MEEME - 36024 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | TOWN OF MISHICOT - 36026 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | TOWN OF NEWTON - 36028 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | TOWN OF ROCKLAND - 36030 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | TOWN OF SCHLESWIG - 36032 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | TOWN OF TWO CREEKS - 36034 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | TOWN OF TWO RIVERS - 36036 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | VILLAGE OF CLEVELAND - 36112 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | VILLAGE OF FRANCIS CREEK - 36126 | ES&S M100 | ES&S AutoMARK |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-----------------------|----------------------------------|--|---|
| MANITOWOC COUNTY - 36 | VILLAGE OF KELLNERSVILLE - 36132 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | VILLAGE OF MARIBEL - 36147 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | VILLAGE OF MISHICOT - 36151 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | VILLAGE OF REEDSVILLE - 36176 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | VILLAGE OF ST. NAZIANZ - 36181 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | VILLAGE OF VALDERS - 36186 | ES&S M100 | ES&S AutoMARK |
| MANITOWOC COUNTY - 36 | VILLAGE OF WHITELAW - 36191 | ES&S M100 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | CITY OF MOSINEE - 37251 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | CITY OF SCHOFIELD - 37281 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | CITY OF WAUSAU - 37291 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF BERGEN - 37002 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF BERLIN - 37004 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF BERN - 37006 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF BEVENT - 37008 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF BRIGHTON - 37010 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF CASSEL - 37012 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF CLEVELAND - 37014 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF DAY - 37016 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF EASTON - 37018 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF EAU PLEINE - 37020 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF ELDERON - 37022 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF EMMET - 37024 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF FRANKFORT - 37026 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF FRANZEN - 37028 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF GREEN VALLEY - 37030 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF GUENTHER - 37032 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF HALSEY - 37034 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF HAMBURG - 37036 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF HARRISON - 37038 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF HEWITT - 37040 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF HOLTON - 37042 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF HULL - 37044 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF JOHNSON - 37046 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF KNOWLTON - 37048 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF MAINE - 37052 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF MARATHON - 37054 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF MCMILLAN - 37056 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF MOSINEE - 37058 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF NORRIE - 37060 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF PLOVER - 37062 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF REID - 37064 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF RIB FALLS - 37066 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF RIB MOUNTAIN - 37068 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF RIETBROCK - 37070 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF RINGLE - 37072 | ES&S DS200 | ES&S AutoMARK |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-----------------------|----------------------------------|--|--|
| MARATHON COUNTY - 37 | TOWN OF SPENCER - 37074 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF STETTIN - 37076 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF TEXAS - 37078 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF WAUSAU - 37080 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF WESTON - 37082 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | TOWN OF WIEN - 37084 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | VILLAGE OF ATHENS - 37102 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | VILLAGE OF BROKAW - 37106 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | VILLAGE OF EDGAR - 37121 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | VILLAGE OF ELDERON - 37122 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | VILLAGE OF FENWOOD - 37126 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | VILLAGE OF HATLEY - 37136 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | VILLAGE OF KRONENWETTER - 37145 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | VILLAGE OF MARATHON CITY - 37151 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | VILLAGE OF ROTHSCILD - 37176 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | VILLAGE OF SPENCER - 37181 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | VILLAGE OF STRATFORD - 37182 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | VILLAGE OF UNITY - MAIN - 37186 | ES&S DS200 | ES&S AutoMARK |
| MARATHON COUNTY - 37 | VILLAGE OF WESTON - 37192 | ES&S DS200 | ES&S AutoMARK |
| MARINETTE COUNTY - 38 | CITY OF MARINETTE - 38251 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | CITY OF NIAGARA - 38261 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | CITY OF PESHTIGO - 38271 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | TOWN OF AMBERG - 38002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | TOWN OF ATHELSTANE - 38004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | TOWN OF BEAVER - 38006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | TOWN OF BEECHER - 38008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | TOWN OF DUNBAR - 38010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | TOWN OF GOODMAN - 38012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | TOWN OF GROVER - 38014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | TOWN OF LAKE - 38016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | TOWN OF MIDDLE INLET - 38018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | TOWN OF NIAGARA - 38020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | TOWN OF PEMBINE - 38022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | TOWN OF PESHTIGO - 38024 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | TOWN OF PORTERFIELD - 38026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | TOWN OF POUND - 38028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | TOWN OF SILVER CLIFF - 38030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | TOWN OF STEPHENSON - 38032 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | TOWN OF WAGNER - 38034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | TOWN OF WAUSAUKEE - 38036 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | VILLAGE OF COLEMAN - 38111 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | VILLAGE OF CRIVITZ - 38121 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | VILLAGE OF POUND - 38171 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARINETTE COUNTY - 38 | VILLAGE OF WAUSAUKEE - 38191 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARQUETTE COUNTY - 39 | CITY OF MONTELLO - 39251 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-----------------------|-----------------------------------|--|--|
| MARQUETTE COUNTY - 39 | TOWN OF BUFFALO - 39002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARQUETTE COUNTY - 39 | TOWN OF CRYSTAL LAKE - 39004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARQUETTE COUNTY - 39 | TOWN OF DOUGLAS - 39006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARQUETTE COUNTY - 39 | TOWN OF HARRIS - 39008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARQUETTE COUNTY - 39 | TOWN OF MECAN - 39010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARQUETTE COUNTY - 39 | TOWN OF MONTELLO - 39012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARQUETTE COUNTY - 39 | TOWN OF MOUNDVILLE - 39014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARQUETTE COUNTY - 39 | TOWN OF NESHKORO - 39016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARQUETTE COUNTY - 39 | TOWN OF NEWTON - 39018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARQUETTE COUNTY - 39 | TOWN OF OXFORD - 39020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARQUETTE COUNTY - 39 | TOWN OF PACKWAUKEE - 39022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARQUETTE COUNTY - 39 | TOWN OF SHIELDS - 39024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARQUETTE COUNTY - 39 | TOWN OF SPRINGFIELD - 39026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARQUETTE COUNTY - 39 | TOWN OF WESTFIELD - 39028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARQUETTE COUNTY - 39 | VILLAGE OF ENDEAVOR - 39121 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARQUETTE COUNTY - 39 | VILLAGE OF NESHKORO - 39161 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARQUETTE COUNTY - 39 | VILLAGE OF OXFORD - 39165 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MARQUETTE COUNTY - 39 | VILLAGE OF WESTFIELD - 39191 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MENOMINEE COUNTY - 40 | TOWN OF MENOMINEE - 40001 | ES&S DS200 | ES&S AutoMARK |
| MILWAUKEE COUNTY - 41 | CITY OF CUDAHY - 41211 | ES&S DS200 | ES&S AutoMARK |
| MILWAUKEE COUNTY - 41 | CITY OF FRANKLIN - 41226 | ES&S DS200 | ES&S AutoMARK |
| MILWAUKEE COUNTY - 41 | CITY OF GLENDALE - 41231 | ES&S DS200 | ES&S AutoMARK |
| MILWAUKEE COUNTY - 41 | CITY OF GREENFIELD - 41236 | ES&S DS200 | ES&S AutoMARK |
| MILWAUKEE COUNTY - 41 | CITY OF MILWAUKEE - MAIN - 41251 | ES&S DS200/ES&S DS850 | ES&S AutoMARK/ES&S ExpressVote |
| MILWAUKEE COUNTY - 41 | CITY OF OAK CREEK - 41265 | ES&S DS200 | ES&S AutoMARK |
| MILWAUKEE COUNTY - 41 | CITY OF SOUTH MILWAUKEE - 41282 | ES&S DS200 | ES&S AutoMARK |
| MILWAUKEE COUNTY - 41 | CITY OF ST. FRANCIS - 41281 | ES&S DS200 | ES&S AutoMARK |
| MILWAUKEE COUNTY - 41 | CITY OF WAUWATOSA - 41291 | ES&S DS200 | ES&S AutoMARK |
| MILWAUKEE COUNTY - 41 | CITY OF WEST ALLIS - 41292 | ES&S DS200 | ES&S AutoMARK/ES&S ExpressVote |
| MILWAUKEE COUNTY - 41 | VILLAGE OF BAYSIDE - MAIN - 41106 | ES&S DS200 | ES&S AutoMARK |
| MILWAUKEE COUNTY - 41 | VILLAGE OF BROWN DEER - 41107 | ES&S DS200 | ES&S AutoMARK |
| MILWAUKEE COUNTY - 41 | VILLAGE OF FOX POINT - 41126 | ES&S DS200 | ES&S AutoMARK |
| MILWAUKEE COUNTY - 41 | VILLAGE OF GREENDALE - 41131 | ES&S DS200 | ES&S AutoMARK |
| MILWAUKEE COUNTY - 41 | VILLAGE OF HALES CORNERS - 41136 | ES&S DS200 | ES&S AutoMARK |
| MILWAUKEE COUNTY - 41 | VILLAGE OF RIVER HILLS - 41176 | ES&S DS200 | ES&S AutoMARK |
| MILWAUKEE COUNTY - 41 | VILLAGE OF SHOREWOOD - 41181 | ES&S DS200 | ES&S AutoMARK |
| MILWAUKEE COUNTY - 41 | VILLAGE OF WEST MILWAUKEE - 41191 | ES&S DS200 | ES&S AutoMARK |
| MILWAUKEE COUNTY - 41 | VILLAGE OF WHITEFISH BAY - 41192 | ES&S DS200 | ES&S AutoMARK |
| MONROE COUNTY - 42 | CITY OF SPARTA - 42281 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | CITY OF TOMAH - 42286 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF ADRIAN - 42002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF ANGELO - 42004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF BYRON - 42006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF CLIFTON - 42008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF GLENDALE - 42010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|--------------------|--------------------------------|--|--|
| MONROE COUNTY - 42 | TOWN OF GRANT - 42012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF GREENFIELD - 42014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF JEFFERSON - 42016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF LA GRANGE - 42020 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF LAFAYETTE - 42018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF LEON - 42022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF LINCOLN - 42024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF LITTLE FALLS - 42026 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF NEW LYME - 42028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF OAKDALE - 42030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF PORTLAND - 42032 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF RIDGEVILLE - 42034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF SCOTT - 42036 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF SHELDON - 42038 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF SPARTA - 42040 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF TOMAH - 42042 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF WELLINGTON - 42044 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF WELLS - 42046 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | TOWN OF WILTON - 42048 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | VILLAGE OF CASHTON - 42111 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | VILLAGE OF KENDALL - 42141 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | VILLAGE OF MELVINA - 42151 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | VILLAGE OF NORWALK - 42161 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | VILLAGE OF OAKDALE - 42165 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | VILLAGE OF WARRENS - 42185 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | VILLAGE OF WILTON - 42191 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| MONROE COUNTY - 42 | VILLAGE OF WYEVILLE - 42192 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| OCONTO COUNTY - 43 | CITY OF GILLET - 43231 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | CITY OF OCONTO - 43265 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | CITY OF OCONTO FALLS - 43266 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF ABRAMS - 43002 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF BAGLEY - 43006 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF BRAZEAU - 43008 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF BREED - 43010 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF CHASE - 43012 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF DOTY - 43014 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF GILLET - 43016 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF HOW - 43018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| OCONTO COUNTY - 43 | TOWN OF LAKEWOOD - 43019 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF LENA - 43020 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF LITTLE RIVER - 43022 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF LITTLE SUAMICO - 43024 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF MAPLE VALLEY - 43026 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF MORGAN - 43028 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF MOUNTAIN - 43029 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-----------------------|---------------------------------|--|--|
| OCONTO COUNTY - 43 | TOWN OF OCONTO - 43030 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF OCONTO FALLS - 43032 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF PENSAUKEE - 43034 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF RIVERVIEW - 43036 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF SPRUCE - 43038 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF STILES - 43040 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF TOWNSEND - 43042 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | TOWN OF UNDERHILL - 43044 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| OCONTO COUNTY - 43 | VILLAGE OF LENA - 43146 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OCONTO COUNTY - 43 | VILLAGE OF SURING - 43181 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| ONEIDA COUNTY - 44 | CITY OF RHINELANDER - 44276 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF CASSIAN - 44002 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF CRESCENT - 44004 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF ENTERPRISE - 44006 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| ONEIDA COUNTY - 44 | TOWN OF HAZELHURST - 44008 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF LAKE TOMAHAWK - 44010 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF LITTLE RICE - 44012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF LYNNE - 44014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF MINOCQUA - 44016 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF MONICO - 44018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF NEWBOLD - 44020 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF NOKOMIS - 44022 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF PELICAN - 44024 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF PIEHL - 44026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF PINE LAKE - 44028 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF SCHOEPEKE - 44030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF STELLA - 44032 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF SUGAR CAMP - 44034 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF THREE LAKES - 44036 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF WOODBORO - 44038 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ONEIDA COUNTY - 44 | TOWN OF WOODRUFF - 44040 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| OUTAGAMIE COUNTY - 45 | CITY OF APPLETON - MAIN - 45201 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | CITY OF KAUKAUNA - MAIN - 45241 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | CITY OF SEYMOUR - 45281 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF BLACK CREEK - 45002 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF BOVINA - 45004 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF BUCHANAN - 45006 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF CENTER - 45008 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF CICERO - 45010 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF DALE - 45012 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF DEER CREEK - 45014 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF ELLINGTON - 45016 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF FREEDOM - 45018 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF GRAND CHUTE - 45020 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF GREENVILLE - 45022 | ES&S DS200 | ES&S ExpressVote |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-----------------------|-----------------------------------|--|--|
| OUTAGAMIE COUNTY - 45 | TOWN OF HORTONIA - 45024 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF KAUKAUNA - 45026 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF LIBERTY - 45028 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF MAINE - 45030 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF MAPLE CREEK - 45032 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF ONEIDA - 45034 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF OSBORN - 45036 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF SEYMOUR - 45038 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | TOWN OF VANDENBROEK - 45040 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | VILLAGE OF BEAR CREEK - 45106 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | VILLAGE OF BLACK CREEK - 45107 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | VILLAGE OF COMBINED LOCKS - 45111 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | VILLAGE OF HORTONVILLE - 45136 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | VILLAGE OF KIMBERLY - 45141 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | VILLAGE OF LITTLE CHUTE - 45146 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | VILLAGE OF NICHOLS - 45155 | ES&S DS200 | ES&S ExpressVote |
| OUTAGAMIE COUNTY - 45 | VILLAGE OF SHIOCTON - 45181 | ES&S DS200 | ES&S ExpressVote |
| OZAUKEE COUNTY - 46 | CITY OF CEDARBURG - 46211 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OZAUKEE COUNTY - 46 | CITY OF MEQUON - 46255 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OZAUKEE COUNTY - 46 | CITY OF PORT WASHINGTON - 46271 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OZAUKEE COUNTY - 46 | TOWN OF BELGIUM - 46002 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OZAUKEE COUNTY - 46 | TOWN OF CEDARBURG - 46004 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OZAUKEE COUNTY - 46 | TOWN OF FREDONIA - 46006 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OZAUKEE COUNTY - 46 | TOWN OF GRAFTON - 46008 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OZAUKEE COUNTY - 46 | TOWN OF PORT WASHINGTON - 46012 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OZAUKEE COUNTY - 46 | TOWN OF SAUKVILLE - 46014 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OZAUKEE COUNTY - 46 | VILLAGE OF BAYSIDE - 41106 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OZAUKEE COUNTY - 46 | VILLAGE OF BELGIUM - 46106 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OZAUKEE COUNTY - 46 | VILLAGE OF FREDONIA - 46126 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OZAUKEE COUNTY - 46 | VILLAGE OF GRAFTON - 46131 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OZAUKEE COUNTY - 46 | VILLAGE OF NEWBURG - 67161 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OZAUKEE COUNTY - 46 | VILLAGE OF SAUKVILLE - 46181 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| OZAUKEE COUNTY - 46 | VILLAGE OF THIENSVILLE - 46186 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PEPIN COUNTY - 47 | CITY OF DURAND - 47216 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PEPIN COUNTY - 47 | TOWN OF ALBANY - 47002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PEPIN COUNTY - 47 | TOWN OF DURAND - 47004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PEPIN COUNTY - 47 | TOWN OF FRANKFORT - 47006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PEPIN COUNTY - 47 | TOWN OF LIMA - 47008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PEPIN COUNTY - 47 | TOWN OF PEPIN - 47010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PEPIN COUNTY - 47 | TOWN OF STOCKHOLM - 47012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PEPIN COUNTY - 47 | TOWN OF WATERVILLE - 47014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PEPIN COUNTY - 47 | TOWN OF WAUBEEK - 47016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PEPIN COUNTY - 47 | VILLAGE OF PEPIN - 47171 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PEPIN COUNTY - 47 | VILLAGE OF STOCKHOLM - 47181 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | CITY OF PRESCOTT - 48271 | ES&S DS200 | ES&S ExpressVote |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|--------------------|---|--|--|
| PIERCE COUNTY - 48 | CITY OF RIVER FALLS - MAIN - 48276 | ES&S DS200 | ES&S ExpressVote |
| PIERCE COUNTY - 48 | TOWN OF CLIFTON - 48002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | TOWN OF DIAMOND BLUFF - 48004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | TOWN OF EL PASO - 48008 | ES&S DS200 | ES&S ExpressVote |
| PIERCE COUNTY - 48 | TOWN OF ELLSWORTH - 48006 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | TOWN OF GILMAN - 48010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | TOWN OF HARTLAND - 48012 | ES&S DS200 | ES&S ExpressVote |
| PIERCE COUNTY - 48 | TOWN OF ISABELLE - 48014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | TOWN OF MAIDEN ROCK - 48016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | TOWN OF MARTELL - 48018 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | TOWN OF OAK GROVE - 48020 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | TOWN OF RIVER FALLS - 48022 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | TOWN OF ROCK ELM - 48024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | TOWN OF SALEM - 48026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | TOWN OF SPRING LAKE - 48028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | TOWN OF TRENTON - 48030 | ES&S DS200 | ES&S ExpressVote |
| PIERCE COUNTY - 48 | TOWN OF TRIMBELLE - 48032 | ES&S DS200 | ES&S ExpressVote |
| PIERCE COUNTY - 48 | TOWN OF UNION - 48034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | VILLAGE OF BAY CITY - 48106 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | VILLAGE OF ELLSWORTH - 48121 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | VILLAGE OF ELMWOOD - 48122 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | VILLAGE OF MAIDEN ROCK - 48151 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | VILLAGE OF PLUM CITY - 48171 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PIERCE COUNTY - 48 | VILLAGE OF SPRING VALLEY - MAIN - 48181 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | CITY OF AMERY - 49201 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | CITY OF ST. CROIX FALLS - 49281 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF ALDEN - 49002 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF APPLE RIVER - 49004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF BALSAM LAKE - 49006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF BEAVER - 49008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF BLACK BROOK - 49010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF BONE LAKE - 49012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF CLAM FALLS - 49014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF CLAYTON - 49016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF CLEAR LAKE - 49018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF EUREKA - 49020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF FARMINGTON - 49022 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF GARFIELD - 49024 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF GEORGETOWN - 49026 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF JOHNSTOWN - 49028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF LAKETOWN - 49030 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF LINCOLN - 49032 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF LORAIN - 49034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF LUCK - 49036 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF MCKINLEY - 49038 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|---------------------|-------------------------------------|--|--|
| POLK COUNTY - 49 | TOWN OF MILLTOWN - 49040 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF OSCEOLA - 49042 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF ST. CROIX FALLS - 49044 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF STERLING - 49046 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | TOWN OF WEST SWEDEN - 49048 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | VILLAGE OF BALSAM LAKE - 49106 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | VILLAGE OF CENTURIA - 49111 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | VILLAGE OF CLAYTON - 49112 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | VILLAGE OF CLEAR LAKE - 49113 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | VILLAGE OF DRESSER - 49116 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | VILLAGE OF FREDERIC - 49126 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | VILLAGE OF LUCK - 49146 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | VILLAGE OF MILLTOWN - 49151 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| POLK COUNTY - 49 | VILLAGE OF OSCEOLA - 49165 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| PORTAGE COUNTY - 50 | CITY OF STEVENS POINT - 50281 | ES&S DS200 | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | TOWN OF ALBAN - 50002 | ES&S DS200 | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | TOWN OF ALMOND - 50004 | ES&S DS200 | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | TOWN OF AMHERST - 50006 | ES&S DS200 | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | TOWN OF BELMONT - 50008 | None | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | TOWN OF BUENA VISTA - 50010 | ES&S M100 | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | TOWN OF CARSON - 50012 | ES&S DS200 | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | TOWN OF DEWEY - 50014 | ES&S DS200 | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | TOWN OF EAU PLEINE - 50016 | None | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | TOWN OF GRANT - 50018 | ES&S DS200 | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | TOWN OF HULL - 50020 | ES&S DS200 | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | TOWN OF LANARK - 50022 | ES&S DS200 | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | TOWN OF LINWOOD - 50024 | None | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | TOWN OF NEW HOPE - 50026 | None | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | TOWN OF PINE GROVE - 50028 | None | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | TOWN OF PLOVER - 50030 | ES&S DS200 | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | TOWN OF SHARON - 50032 | ES&S DS200 | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | TOWN OF STOCKTON - 50034 | ES&S DS200 | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | VILLAGE OF ALMOND - 50101 | None | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | VILLAGE OF AMHERST - 50102 | None | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | VILLAGE OF AMHERST JUNCTION - 50103 | None | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | VILLAGE OF JUNCTION CITY - 50141 | None | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | VILLAGE OF NELSONVILLE - 50161 | None | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | VILLAGE OF PARK RIDGE - 50171 | None | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | VILLAGE OF PLOVER - 50173 | ES&S DS200 | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | VILLAGE OF ROSHOLT - 50176 | ES&S M100 | ES&S AutoMARK |
| PORTAGE COUNTY - 50 | VILLAGE OF WHITING - 50191 | ES&S M100 | ES&S AutoMARK |
| PRICE COUNTY - 51 | CITY OF PARK FALLS - 51271 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | CITY OF PHILLIPS - 51272 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | TOWN OF CATAWBA - 51002 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | TOWN OF EISENSTEIN - 51004 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|----------------------|-----------------------------------|--|--|
| PRICE COUNTY - 51 | TOWN OF ELK - 51006 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | TOWN OF EMERY - 51008 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | TOWN OF FIFIELD - 51010 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | TOWN OF FLAMBEAU - 51012 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | TOWN OF GEORGETOWN - 51014 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | TOWN OF HACKETT - 51016 | None | Sequoia Voting - AVC Edge |
| PRICE COUNTY - 51 | TOWN OF HARMONY - 51018 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | TOWN OF HILL - 51020 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | TOWN OF KENNAN - 51022 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | TOWN OF KNOX - 51024 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | TOWN OF LAKE - 51026 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | TOWN OF OGEMA - 51028 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | TOWN OF PRENTICE - 51030 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | TOWN OF SPIRIT - 51032 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | TOWN OF WORCESTER - 51034 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | VILLAGE OF CATAWBA - 51111 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | VILLAGE OF KENNAN - 51141 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| PRICE COUNTY - 51 | VILLAGE OF PRENTICE - 51171 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RACINE COUNTY - 52 | CITY OF BURLINGTON - MAIN - 52206 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RACINE COUNTY - 52 | CITY OF RACINE - 52276 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RACINE COUNTY - 52 | TOWN OF BURLINGTON - 52002 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RACINE COUNTY - 52 | TOWN OF DOVER - 52006 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RACINE COUNTY - 52 | TOWN OF NORWAY - 52010 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RACINE COUNTY - 52 | TOWN OF RAYMOND - 52012 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RACINE COUNTY - 52 | TOWN OF WATERFORD - 52016 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RACINE COUNTY - 52 | TOWN OF YORKVILLE - 52018 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RACINE COUNTY - 52 | VILLAGE OF CALEDONIA - 52104 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RACINE COUNTY - 52 | VILLAGE OF ELMWOOD PARK - 52121 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RACINE COUNTY - 52 | VILLAGE OF MOUNT PLEASANT - 52151 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RACINE COUNTY - 52 | VILLAGE OF NORTH BAY - 52161 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RACINE COUNTY - 52 | VILLAGE OF ROCHESTER - 52176 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RACINE COUNTY - 52 | VILLAGE OF STURTEVANT - 52181 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RACINE COUNTY - 52 | VILLAGE OF UNION GROVE - 52186 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RACINE COUNTY - 52 | VILLAGE OF WATERFORD - 52191 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RACINE COUNTY - 52 | VILLAGE OF WIND POINT - 52192 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RACINE COUNTY - 52 | VILLAGE OF YORKVILLE - 52194 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RICHLAND COUNTY - 53 | CITY OF RICHLAND CENTER - 53276 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | TOWN OF AKAN - 53002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | TOWN OF BLOOM - 53004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | TOWN OF BUENA VISTA - 53006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | TOWN OF DAYTON - 53008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | TOWN OF EAGLE - 53010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | TOWN OF FOREST - 53012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | TOWN OF HENRIETTA - 53014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | TOWN OF ITHACA - 53016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|----------------------|-------------------------------------|--|--|
| RICHLAND COUNTY - 53 | TOWN OF MARSHALL - 53018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | TOWN OF ORION - 53020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | TOWN OF RICHLAND - 53022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | TOWN OF RICHWOOD - 53024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | TOWN OF ROCKBRIDGE - 53026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | TOWN OF SYLVAN - 53028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | TOWN OF WESTFORD - 53030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | TOWN OF WILLOW - 53032 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | VILLAGE OF BOAZ - 53106 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | VILLAGE OF CAZENOVIA - MAIN - 53111 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | VILLAGE OF LONE ROCK - 53146 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | VILLAGE OF VIOLA - MAIN - 53186 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RICHLAND COUNTY - 53 | VILLAGE OF YUBA - 53196 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| ROCK COUNTY - 54 | CITY OF БЕЛОИТ - 54206 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | CITY OF EDGERTON - MAIN - 54221 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | CITY OF EVANSVILLE - 54222 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | CITY OF JANESVILLE - 54241 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | CITY OF MILTON - 54257 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF AVON - 54002 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF БЕЛОИТ - 54004 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF BRADFORD - 54006 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF CENTER - 54008 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF CLINTON - 54010 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF FULTON - 54012 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF HARMONY - 54014 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF JANESVILLE - 54016 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF JOHNSTOWN - 54018 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF LA PRAIRIE - 54020 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF LIMA - 54022 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF MAGNOLIA - 54024 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF MILTON - 54026 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF NEWARK - 54028 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF PLYMOUTH - 54030 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF PORTER - 54032 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF ROCK - 54034 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF SPRING VALLEY - 54036 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF TURTLE - 54038 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | TOWN OF UNION - 54040 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | VILLAGE OF CLINTON - 54111 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | VILLAGE OF FOOTVILLE - 54126 | ES&S DS200 | ES&S ExpressVote |
| ROCK COUNTY - 54 | VILLAGE OF ORFORDVILLE - 54165 | ES&S DS200 | ES&S ExpressVote |
| RUSK COUNTY - 55 | CITY OF LADYSMITH - 55246 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| RUSK COUNTY - 55 | TOWN OF ATLANTA - 55002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF BIG BEND - 55004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF BIG FALLS - 55006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|------------------|---------------------------------|--|--|
| RUSK COUNTY - 55 | TOWN OF CEDAR RAPIDS - 55008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF DEWEY - 55010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF FLAMBEAU - 55012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF GRANT - 55014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF GROW - 55016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF HAWKINS - 55018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF HUBBARD - 55020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF LAWRENCE - 55022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF MARSHALL - 55024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF MURRY - 55026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF RICHLAND - 55028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF RUSK - 55030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF SOUTH FORK - 55032 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF STRICKLAND - 55034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF STUBBS - 55036 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF THORNAPPLE - 55038 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF TRUE - 55040 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF WASHINGTON - 55042 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF WILKINSON - 55044 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF WILLARD - 55046 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | TOWN OF WILSON - 55048 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | VILLAGE OF BRUCE - 55106 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | VILLAGE OF CONRATH - 55111 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | VILLAGE OF GLEN FLORA - 55131 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | VILLAGE OF HAWKINS - 55136 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | VILLAGE OF INGRAM - 55141 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | VILLAGE OF SHELDON - 55181 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | VILLAGE OF TONY - 55186 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| RUSK COUNTY - 55 | VILLAGE OF WEYERHAEUSER - 55191 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAUK COUNTY - 57 | CITY OF BARABOO - 57206 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | CITY OF REEDSBURG - 57276 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF BARABOO - 57002 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF BEAR CREEK - 57004 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF DELLONA - 57006 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF DELTON - 57008 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF EXCELSIOR - 57010 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF FAIRFIELD - 57012 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF FRANKLIN - 57014 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF FREEDOM - 57016 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF GREENFIELD - 57018 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF HONEY CREEK - 57020 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF IRONTON - 57022 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF LA VALLE - 57024 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF MERRIMAC - 57026 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF PRAIRIE DU SAC - 57028 | ES&S DS200 | ES&S ExpressVote |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|---------------------|-----------------------------------|--|--|
| SAUK COUNTY - 57 | TOWN OF REEDSBURG - 57030 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF SPRING GREEN - 57032 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF SUMPTER - 57034 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF TROY - 57036 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF WASHINGTON - 57038 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF WESTFIELD - 57040 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF WINFIELD - 57042 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | TOWN OF WOODLAND - 57044 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | VILLAGE OF IRONTON - 57141 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | VILLAGE OF LAKE DELTON - 57146 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | VILLAGE OF LAVALLE - 57147 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | VILLAGE OF LIME RIDGE - 57148 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | VILLAGE OF LOGANVILLE - 57149 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | VILLAGE OF MERRIMAC - 57151 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | VILLAGE OF NORTH FREEDOM - 57161 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | VILLAGE OF PLAIN - 57171 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | VILLAGE OF PRAIRIE DU SAC - 57172 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | VILLAGE OF ROCK SPRINGS - 57176 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | VILLAGE OF SAUK CITY - 57181 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | VILLAGE OF SPRING GREEN - 57182 | ES&S DS200 | ES&S ExpressVote |
| SAUK COUNTY - 57 | VILLAGE OF WEST BARABOO - 57191 | ES&S DS200 | ES&S ExpressVote |
| SAWYER COUNTY - 58 | CITY OF HAYWARD - 58236 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAWYER COUNTY - 58 | TOWN OF BASS LAKE - 58002 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| SAWYER COUNTY - 58 | TOWN OF COUDERAY - 58004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAWYER COUNTY - 58 | TOWN OF DRAPER - 58006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAWYER COUNTY - 58 | TOWN OF EDGEWATER - 58008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAWYER COUNTY - 58 | TOWN OF HAYWARD - 58010 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAWYER COUNTY - 58 | TOWN OF HUNTER - 58012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAWYER COUNTY - 58 | TOWN OF LENROOT - 58014 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| SAWYER COUNTY - 58 | TOWN OF MEADOWBROOK - 58016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAWYER COUNTY - 58 | TOWN OF METEOR - 58018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAWYER COUNTY - 58 | TOWN OF OJIBWA - 58020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAWYER COUNTY - 58 | TOWN OF RADISSON - 58022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAWYER COUNTY - 58 | TOWN OF ROUND LAKE - 58024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAWYER COUNTY - 58 | TOWN OF SAND LAKE - 58026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAWYER COUNTY - 58 | TOWN OF SPIDER LAKE - 58028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAWYER COUNTY - 58 | TOWN OF WEIRGOR - 58030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAWYER COUNTY - 58 | TOWN OF WINTER - 58032 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAWYER COUNTY - 58 | VILLAGE OF COUDERAY - 58111 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAWYER COUNTY - 58 | VILLAGE OF EXELAND - 58121 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAWYER COUNTY - 58 | VILLAGE OF RADISSON - 58176 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SAWYER COUNTY - 58 | VILLAGE OF WINTER - 58190 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | CITY OF SHAWANO - 59281 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF ALMON - 59002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF ANGELICA - 59004 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-----------------------|--------------------------------------|--|--|
| SHAWANO COUNTY - 59 | TOWN OF ANIWA - 59006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF BARTELME - 59008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF BELLE PLAINE - 59010 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF BIRNAMWOOD - 59012 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF FAIRBANKS - 59014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF GERMANIA - 59016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF GRANT - 59018 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF GREEN VALLEY - 59020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF HARTLAND - 59022 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF HERMAN - 59024 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF HUTCHINS - 59026 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF LESSOR - 59028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF MAPLE GROVE - 59030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF MORRIS - 59032 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF NAVARINO - 59034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF PELLA - 59036 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF RED SPRINGS - 59038 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF RICHMOND - 59040 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF SENECA - 59042 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF WASHINGTON - 59044 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF WAUKECHON - 59046 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF WESCOTT - 59048 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | TOWN OF WITTENBERG - 59050 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | VILLAGE OF ANIWA - 59101 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | VILLAGE OF BIRNAMWOOD - MAIN - 59106 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | VILLAGE OF BONDUEL - 59107 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | VILLAGE OF BOWLER - 59108 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | VILLAGE OF CECIL - 59111 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | VILLAGE OF ELAND - 59121 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | VILLAGE OF GRESHAM - 59131 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | VILLAGE OF MATTOON - 59151 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | VILLAGE OF TIGERTON - 59186 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHAWANO COUNTY - 59 | VILLAGE OF WITTENBERG - 59191 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| SHEBOYGAN COUNTY - 60 | CITY OF PLYMOUTH - 60271 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | CITY OF SHEBOYGAN - 60281 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | CITY OF SHEBOYGAN FALLS - 60282 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | TOWN OF GREENBUSH - 60002 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | TOWN OF HERMAN - 60004 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | TOWN OF HOLLAND - 60006 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | TOWN OF LIMA - 60008 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | TOWN OF LYNDON - 60010 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | TOWN OF MITCHELL - 60012 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | TOWN OF MOSEL - 60014 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | TOWN OF PLYMOUTH - 60016 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | TOWN OF RHINE - 60018 | ClearCount 2.0.1 | ClearAccess 2.0.1 |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-----------------------|----------------------------------|--|---|
| SHEBOYGAN COUNTY - 60 | TOWN OF RUSSELL - 60020 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | TOWN OF SCOTT - 60022 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | TOWN OF SHEBOYGAN - 60024 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | TOWN OF SHEBOYGAN FALLS - 60026 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | TOWN OF SHERMAN - 60028 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | TOWN OF WILSON - 60030 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | VILLAGE OF ADELL - 60101 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | VILLAGE OF CASCADE - 60111 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | VILLAGE OF CEDAR GROVE - 60112 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | VILLAGE OF ELKHART LAKE - 60121 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | VILLAGE OF GLENBEULAH - 60131 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | VILLAGE OF HOWARDS GROVE - 60135 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | VILLAGE OF KOHLER - 60141 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | VILLAGE OF OOSTBURG - 60165 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | VILLAGE OF RANDOM LAKE - 60176 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| SHEBOYGAN COUNTY - 60 | VILLAGE OF WALDO - 60191 | ClearCount 2.0.1 | ClearAccess 2.0.1 |
| ST. CROIX COUNTY - 56 | CITY OF GLENWOOD CITY - 56231 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | CITY OF HUDSON - 56236 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | CITY OF NEW RICHMOND - 56261 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF BALDWIN - 56002 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF CADY - 56004 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF CYLON - 56006 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF EAU GALLE - 56008 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF EMERALD - 56010 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF ERIN PRAIRIE - 56012 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF FOREST - 56014 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF GLENWOOD - 56016 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF HAMMOND - 56018 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF HUDSON - 56020 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF KINNICKINNIC - 56022 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF PLEASANT VALLEY - 56024 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF RICHMOND - 56026 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF RUSH RIVER - 56028 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF SOMERSET - 56032 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF SPRINGFIELD - 56034 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF ST. JOSEPH - 56030 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF STANTON - 56036 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF STAR PRAIRIE - 56038 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF TROY - 56040 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | TOWN OF WARREN - 56042 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | VILLAGE OF BALDWIN - 56106 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | VILLAGE OF DEER PARK - 56116 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | VILLAGE OF HAMMOND - 56136 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | VILLAGE OF NORTH HUDSON - 56161 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | VILLAGE OF ROBERTS - 56176 | ES&S DS200 | ES&S ExpressVote |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-------------------------|---------------------------------|--|--|
| ST. CROIX COUNTY - 56 | VILLAGE OF SOMERSET - 56181 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | VILLAGE OF STAR PRAIRIE - 56182 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | VILLAGE OF WILSON - 56191 | ES&S DS200 | ES&S ExpressVote |
| ST. CROIX COUNTY - 56 | VILLAGE OF WOODVILLE - 56192 | ES&S DS200 | ES&S ExpressVote |
| TAYLOR COUNTY - 61 | CITY OF MEDFORD - 61251 | ES&S M100 | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF AURORA - 61002 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF BROWNING - 61004 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF CHELSEA - 61006 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF CLEVELAND - 61008 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF DEER CREEK - 61010 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF FORD - 61012 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF GOODRICH - 61014 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF GREENWOOD - 61016 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF GROVER - 61018 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF HAMMEL - 61020 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF HOLWAY - 61022 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF JUMP RIVER - 61024 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF LITTLE BLACK - 61026 | ES&S M100 | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF MAPLEHURST - 61028 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF MCKINLEY - 61030 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF MEDFORD - 61032 | ES&S M100 | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF MOLITOR - 61034 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF PERSHING - 61036 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF RIB LAKE - 61038 | ES&S M100 | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF ROOSEVELT - 61040 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF TAFT - 61042 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | TOWN OF WESTBORO - 61044 | ES&S M100 | ES&S iVotronic |
| TAYLOR COUNTY - 61 | VILLAGE OF GILMAN - 61131 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | VILLAGE OF LUBLIN - 61146 | None | ES&S iVotronic |
| TAYLOR COUNTY - 61 | VILLAGE OF RIB LAKE - 61176 | ES&S M100 | ES&S iVotronic |
| TAYLOR COUNTY - 61 | VILLAGE OF STETSONVILLE - 61181 | None | ES&S iVotronic |
| TREMPEALEAU COUNTY - 62 | CITY OF ARCADIA - 62201 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| TREMPEALEAU COUNTY - 62 | CITY OF BLAIR - 62206 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | CITY OF GALESVILLE - 62231 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | CITY OF INDEPENDENCE - 62241 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | CITY OF OSSEO - 62265 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | CITY OF WHITEHALL - 62291 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | TOWN OF ALBION - 62002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | TOWN OF ARCADIA - 62004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | TOWN OF BURNSIDE - 62006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | TOWN OF CALEDONIA - 62008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | TOWN OF CHIMNEY ROCK - 62010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | TOWN OF DODGE - 62012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | TOWN OF ETTRICK - 62014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | TOWN OF GALE - 62016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-------------------------|-----------------------------------|--|--|
| TREMPEALEAU COUNTY - 62 | TOWN OF HALE - 62018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | TOWN OF LINCOLN - 62020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | TOWN OF PIGEON - 62022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | TOWN OF PRESTON - 62024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | TOWN OF SUMNER - 62026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | TOWN OF TREMPLEALEAU - 62028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | TOWN OF UNITY - 62030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | VILLAGE OF ELEVA - 62121 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | VILLAGE OF ETTRICK - 62122 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | VILLAGE OF PIGEON FALLS - 62173 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | VILLAGE OF STRUM - 62181 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| TREMPEALEAU COUNTY - 62 | VILLAGE OF TREMPLEALEAU - 62186 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | CITY OF HILLSBORO - 63236 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | CITY OF VIROQUA - 63286 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | CITY OF WESTBY - 63291 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF BERGEN - 63002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF CHRISTIANA - 63004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF CLINTON - 63006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF COON - 63008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF FOREST - 63010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF FRANKLIN - 63012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF GENOA - 63014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF GREENWOOD - 63016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF HAMBURG - 63018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF HARMONY - 63020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF HILLSBORO - 63022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF JEFFERSON - 63024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF KICKAPOO - 63026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF LIBERTY - 63028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF STARK - 63030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF STERLING - 63032 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF UNION - 63034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF VIROQUA - 63036 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF WEBSTER - 63038 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF WHEATLAND - 63040 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | TOWN OF WHITESTOWN - 63042 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | VILLAGE OF CHASEBURG - 63111 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | VILLAGE OF COON VALLEY - 63112 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | VILLAGE OF DE SOTO - MAIN - 63116 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | VILLAGE OF GENOA - 63131 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | VILLAGE OF LA FARGE - 63146 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | VILLAGE OF ONTARIO - 63165 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | VILLAGE OF READSTOWN - 63176 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VERNON COUNTY - 63 | VILLAGE OF STODDARD - 63181 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| VILAS COUNTY - 64 | CITY OF EAGLE RIVER - 64221 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|----------------------|--------------------------------------|--|--|
| VILAS COUNTY - 64 | TOWN OF ARBOR VITAE - 64002 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| VILAS COUNTY - 64 | TOWN OF BOULDER JUNCTION - 64004 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| VILAS COUNTY - 64 | TOWN OF CLOVERLAND - 64006 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| VILAS COUNTY - 64 | TOWN OF CONOVER - 64008 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| VILAS COUNTY - 64 | TOWN OF LAC DU FLAMBEAU - 64010 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| VILAS COUNTY - 64 | TOWN OF LAND O-LAKES - 64012 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| VILAS COUNTY - 64 | TOWN OF LINCOLN - 64014 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| VILAS COUNTY - 64 | TOWN OF MANITOWISH WATERS - 64016 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| VILAS COUNTY - 64 | TOWN OF PHELPS - 64018 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| VILAS COUNTY - 64 | TOWN OF PLUM LAKE - 64020 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| VILAS COUNTY - 64 | TOWN OF PRESQUE ISLE - 64022 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| VILAS COUNTY - 64 | TOWN OF ST. GERMAIN - 64024 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| VILAS COUNTY - 64 | TOWN OF WASHINGTON - 64026 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| VILAS COUNTY - 64 | TOWN OF WINCHESTER - 64028 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | CITY OF DELAVAN - 65216 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | CITY OF ELKHORN - 65221 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | CITY OF LAKE GENEVA - 65246 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | CITY OF WHITEWATER - MAIN - 65291 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | TOWN OF BLOOMFIELD - 65002 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | TOWN OF DARIEN - 65004 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | TOWN OF DELAVAN - 65006 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | TOWN OF EAST TROY - 65008 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | TOWN OF GENEVA - 65010 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | TOWN OF LA GRANGE - 65014 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | TOWN OF LAFAYETTE - 65012 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | TOWN OF LINN - 65016 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | TOWN OF LYONS - 65018 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | TOWN OF RICHMOND - 65020 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | TOWN OF SHARON - 65022 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | TOWN OF SPRING PRAIRIE - 65024 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | TOWN OF SUGAR CREEK - 65026 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | TOWN OF TROY - 65028 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | TOWN OF WALWORTH - 65030 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | TOWN OF WHITEWATER - 65032 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | VILLAGE OF BLOOMFIELD - 65115 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | VILLAGE OF DARIEN - 65116 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | VILLAGE OF EAST TROY - 65121 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | VILLAGE OF FONTANA - 65126 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | VILLAGE OF GENOA CITY - MAIN - 65131 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | VILLAGE OF SHARON - 65181 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | VILLAGE OF WALWORTH - 65191 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WALWORTH COUNTY - 65 | VILLAGE OF WILLIAMS BAY - 65192 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHBURN COUNTY - 66 | CITY OF SHELL LAKE - 66282 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | CITY OF SPOONER - 66281 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF BARRONETT - 66002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|------------------------|------------------------------------|--|--|
| WASHBURN COUNTY - 66 | TOWN OF BASHAW - 66004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF BASS LAKE - 66006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF BEAVER BROOK - 66008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF BIRCHWOOD - 66010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF BROOKLYN - 66012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF CASEY - 66014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF CHICOG - 66016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF CRYSTAL - 66018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF EVERGREEN - 66020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF FROG CREEK - 66022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF GULL LAKE - 66024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF LONG LAKE - 66026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF MADGE - 66028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF MINONG - 66030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF SARONA - 66032 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF SPOONER - 66034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF SPRINGBROOK - 66036 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF STINNETT - 66038 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF STONE LAKE - 66040 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | TOWN OF TREGO - 66042 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | VILLAGE OF BIRCHWOOD - 66106 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHBURN COUNTY - 66 | VILLAGE OF MINONG - 66151 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WASHINGTON COUNTY - 67 | CITY OF HARTFORD - MAIN - 67236 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | CITY OF WEST BEND - 67291 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | TOWN OF ADDISON - 67002 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | TOWN OF BARTON - 67004 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | TOWN OF ERIN - 67006 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | TOWN OF FARMINGTON - 67008 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | TOWN OF GERMANTOWN - 67010 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | TOWN OF HARTFORD - 67012 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | TOWN OF JACKSON - 67014 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | TOWN OF KEWASKUM - 67016 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | TOWN OF POLK - 67018 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | TOWN OF TRENTON - 67022 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | TOWN OF WAYNE - 67024 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | TOWN OF WEST BEND - 67026 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | VILLAGE OF GERMANTOWN - 67131 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | VILLAGE OF JACKSON - 67141 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | VILLAGE OF KEWASKUM - MAIN - 67142 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | VILLAGE OF NEWBURG - MAIN - 67161 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | VILLAGE OF RICHFIELD - 67166 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WASHINGTON COUNTY - 67 | VILLAGE OF SLINGER - 67181 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WAUKESHA COUNTY - 68 | CITY OF BROOKFIELD - 68206 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | CITY OF DELAFIELD - 68216 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | CITY OF MUSKEGO - 68251 | ES&S DS200 | ES&S ExpressVote |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|----------------------|--|--|--|
| WAUKESHA COUNTY - 68 | CITY OF NEW BERLIN - 68261 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | CITY OF OCONOMOWOC - 68265 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | CITY OF PEWAUKEE - 68270 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | CITY OF WAUKESHA - 68291 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | TOWN OF BROOKFIELD - 68002 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | TOWN OF DELAFIELD - 68004 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | TOWN OF EAGLE - 68006 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | TOWN OF GENESEE - 68008 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | TOWN OF LISBON - 68010 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | TOWN OF MERTON - 68014 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | TOWN OF MUKWONAGO - 68016 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | TOWN OF OCONOMOWOC - 68022 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | TOWN OF OTTAWA - 68024 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | TOWN OF VERNON - 68030 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | TOWN OF WAUKESHA - 68032 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF BIG BEND - 68106 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF BUTLER - 68107 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF CHENEQUA - 68111 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF DOUSMAN - 68116 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF EAGLE - 68121 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF ELM GROVE - 68122 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF HARTLAND - 68136 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF LAC LA BELLE - MAIN - 68146 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF LANNON - 68147 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF MENOMONEE FALLS - 68151 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF MERTON - 68152 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF MUKWONAGO - MAIN - 68153 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF NASHOTAH - 68158 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF NORTH PRAIRIE - 68161 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF OCONOMOWOC LAKE - 68166 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF PEWAUKEE - 68171 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF SUMMIT - 68172 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF SUSSEX - 68181 | ES&S DS200 | ES&S ExpressVote |
| WAUKESHA COUNTY - 68 | VILLAGE OF WALES - 68191 | ES&S DS200 | ES&S ExpressVote |
| WAUPACA COUNTY - 69 | CITY OF CLINTONVILLE - 69211 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WAUPACA COUNTY - 69 | CITY OF MANAWA - 69251 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | CITY OF MARION - MAIN - 69252 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | CITY OF NEW LONDON - MAIN - 69261 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WAUPACA COUNTY - 69 | CITY OF WAUPACA - 69291 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | CITY OF WEYAUWEGA - 69292 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF BEAR CREEK - 69002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF CALEDONIA - 69004 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WAUPACA COUNTY - 69 | TOWN OF DAYTON - 69006 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF DUPONT - 69008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF FARMINGTON - 69010 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|----------------------|--------------------------------|--|--|
| WAUPACA COUNTY - 69 | TOWN OF FREMONT - 69012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF HARRISON - 69014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF HELVETIA - 69016 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF IOLA - 69018 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF LARRABEE - 69020 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF LEBANON - 69022 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF LIND - 69024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF LITTLE WOLF - 69026 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WAUPACA COUNTY - 69 | TOWN OF MATTESON - 69028 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF MUKWA - 69030 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF ROYALTON - 69032 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF SAINT LAWRENCE - 69034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF SCANDINAVIA - 69036 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF UNION - 69038 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF WAUPACA - 69040 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF WEYAUWEGA - 69042 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | TOWN OF WYOMING - 69044 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | VILLAGE OF BIG FALLS - 69106 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | VILLAGE OF EMBARRASS - 69121 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | VILLAGE OF FREMONT - 69126 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | VILLAGE OF IOLA - 69141 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | VILLAGE OF OGDENSBURG - 69165 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUPACA COUNTY - 69 | VILLAGE OF SCANDINAVIA - 69181 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | CITY OF WAUTOMA - 70291 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | TOWN OF AURORA - 70002 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | TOWN OF BLOOMFIELD - 70004 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | TOWN OF COLOMA - 70006 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | TOWN OF DAKOTA - 70008 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | TOWN OF DEERFIELD - 70010 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | TOWN OF HANCOCK - 70012 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | TOWN OF LEON - 70014 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | TOWN OF MARION - 70016 | Sequoia Voting - Optech Insight | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | TOWN OF MOUNT MORRIS - 70018 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | TOWN OF OASIS - 70020 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | TOWN OF PLAINFIELD - 70022 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | TOWN OF POY SIPPI - 70024 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | TOWN OF RICHFORD - 70026 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | TOWN OF ROSE - 70028 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | TOWN OF SAXEVILLE - 70030 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | TOWN OF SPRINGWATER - 70032 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | TOWN OF WARREN - 70034 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | TOWN OF WAUTOMA - 70036 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | VILLAGE OF COLOMA - 70111 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | VILLAGE OF HANCOCK - 70136 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | VILLAGE OF LOHRVILLE - 70146 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|-----------------------|-----------------------------------|--|--|
| WAUSHARA COUNTY - 70 | VILLAGE OF PLAINFIELD - 70171 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | VILLAGE OF REDGRANITE - 70176 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WAUSHARA COUNTY - 70 | VILLAGE OF WILD ROSE - 70191 | None | Sequoia Voting - AVC Edge with VeriVote Printer DRE system |
| WINNEBAGO COUNTY - 71 | CITY OF MENASHA - MAIN - 71251 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | CITY OF NEENAH - 71261 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | CITY OF OMRO - 71265 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | CITY OF OSHKOSH - 71266 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | TOWN OF ALGOMA - 71002 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | TOWN OF BLACK WOLF - 71004 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | TOWN OF CLAYTON - 71006 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | TOWN OF MENASHA - 71008 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | TOWN OF NEENAH - 71010 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | TOWN OF NEKIMI - 71012 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | TOWN OF NEPEUSKUN - 71014 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | TOWN OF OMRO - 71016 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | TOWN OF OSHKOSH - 71018 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | TOWN OF POYGAN - 71020 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | TOWN OF RUSHFORD - 71022 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | TOWN OF UTICA - 71024 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | TOWN OF VINLAND - 71026 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | TOWN OF WINCHESTER - 71028 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | TOWN OF WINNECONNE - 71030 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | TOWN OF WOLF RIVER - 71032 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | VILLAGE OF FOX CROSSING - 71121 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WINNEBAGO COUNTY - 71 | VILLAGE OF WINNECONNE - 71191 | Dominion Voting - ImageCast Evolution (ICE) | Dominion Voting - ImageCast Evolution (ICE) |
| WOOD COUNTY - 72 | CITY OF MARSHFIELD - MAIN - 72251 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | CITY OF NEKOOSA - 72261 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | CITY OF PITTSVILLE - 72271 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | CITY OF WISCONSIN RAPIDS - 72291 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF ARPIN - 72002 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF AUBURNDALE - 72004 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF CAMERON - 72006 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF CARY - 72008 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF CRANMOOR - 72010 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF DEXTER - 72012 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF GRAND RAPIDS - 72014 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF HANSEN - 72016 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF HILES - 72018 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF LINCOLN - 72020 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF MARSHFIELD - 72022 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF MILLADORE - 72024 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF PORT EDWARDS - 72026 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF REMINGTON - 72028 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF RICHFIELD - 72030 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF ROCK - 72032 | ES&S DS200 | ES&S AutoMARK |

| County | Municipality | Optical/Digital Scan Tabulator (Vendor/Dealer-Model) | Accessible Voting Equipment Vendor/Dealer-Model |
|------------------|-------------------------------------|--|---|
| WOOD COUNTY - 72 | TOWN OF RUDOLPH - 72034 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF SARATOGA - 72036 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF SENECA - 72038 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF SHERRY - 72040 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF SIGEL - 72042 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | TOWN OF WOOD - 72044 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | VILLAGE OF ARPIN - 72100 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | VILLAGE OF AUBURNDALE - 72101 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | VILLAGE OF BIRON - 72106 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | VILLAGE OF HEWITT - 72122 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | VILLAGE OF MILLADORE - MAIN - 72151 | None | ES&S AutoMARK |
| WOOD COUNTY - 72 | VILLAGE OF PORT EDWARDS - 72171 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | VILLAGE OF RUDOLPH - 72178 | ES&S DS200 | ES&S AutoMARK |
| WOOD COUNTY - 72 | VILLAGE OF VESPER - 72186 | ES&S DS200 | ES&S AutoMARK |

STATE OF COLORADO)
County of Douglas)ss.

COMES NOW, Affiant Joseph T. Oltmann, being first duly sworn, under oath, and states under penalty of perjury that the following information is true and accurate within his personal knowledge and belief:

My name Joseph Oltmann. I am over eighteen years of age. I am not suffering under any mental disability and am competent to give this sworn affidavit. I am able to read and write and to give this affidavit voluntarily and on my own free will and accord. No one has used any threats, force, pressure, or intimidation to make me sign this affidavit. I make this affidavit in support of the truth.

I am the CEO of a tech company based just outside of Denver, Colorado. I am also the founder of an organization called FEC United. [[Fecunited.com](https://fecunited.com)] The goal of this organization is to restore constitutional integrity to our community and empower those in our community to stand up to state and national leadership that intends to suppress the rights of individuals holistically.

Through this organization "FEC" I became a target of journalists who began to slander both me and my organization. I became the topic of Antifa and extremists through my involvement in a movement to resist the narrative that police are bad and our society represented the rhetoric shared by these extremists. As a result of these attacks, I started researching Antifa, BLM, Inc. and their connection to violence and unrest inside of our communities. As a result, I set out to infiltrate Antifa meetings and de-mask those Antifa members who are journalists in the mainstream media in Colorado specifically.

On or about the week of September 27, 2020, I was able to attend an Antifa meeting which appeared to be between Antifa members in Colorado Springs and in Denver Colorado. I cannot verify the connection between the two or the leadership as they were disorganized. Discussions of Our Revolution and Antifa were discussed. Rhetoric of "eliminating fascists" and frustration as to the dwindling of support to rally in the street was evident.

Then I honed in among other conversations key actors in the organization who work for local and state news publications. One such person of interest was Heidi Beedle, identified leader of Our Revolution in El Paso County (Southern Colorado) and Antifa leader of the same area.

Heidi's name is actually Sean Beedle. She is a journalist at Colorado Springs Independent, Colorado Springs Business Journal and a freelance writer for several online publications. Others to remain unnamed in this were present.

The conversation went like this:

Someone identified as "Eric" began to speak. Someone asked who Eric was, and someone else replied "he is the Dominion guy" [paraphrased].

Eric then began to speak after being told to continue, but was interrupted and asked by someone, "What are we going to do if Trump wins this fucking election?"

Eric responded, "Don't worry about the election. Trump is not going to win. I made fucking sure of that.. Hahaha"

Someone responded, "Fucking right."

Eric continued with fortifying the groups and recruiting. I would describe his tone as eccentric and boisterous. I wrote down his name and started to do some research into him.

At the time, I thought that they were so disconnected with reality that they think they can "make sure Trump is not elected."

I started with a simple google search: Keywords: "Eric," "Dominion," "Denver Colorado." The fifth result in organic search returned:

[Dominion Voting Systems | Employee Profiles, Emails, Mutual ...](#)

www.leadcandy.io › company › Dominion-Voting-Syst...

Find people working at Dominion Voting Systems. LeadCandy provides Full ... Denver, Colorado. VIEW FULL PROFILE ... FULL PROFILE. Eric Coomer's photo ...

Above that were results for Eric Schussler- Old Dominion University and Eric E Johnson, Attorney - Sherman & Howard. The first two on organic search however was as follows:

[Dominion - Colorado Secretary of State](#)

www.sos.state.co.us › elections › files › projectPlans
PDF

Sep 9, 2016 — our most recent pilots in the City and County of Denver and Mesa County.

... 1 Democracy Suite is a registered trademark of Dominion Voting Systems. ... Eric Coomer graduated from the University of California, Berkeley in ...

And

[Eric Coomer's email & phone | Dominion Voting Systems's ...](#)

rocketreach.co › eric-coomer-email_7112825

Location, **Denver, Colorado**, United States. Work, Director, Market Strategy @ **Dominion Voting Systems** Member, Board of Directors @ Friends of Levitt Pavilion ...

I began doing research on Eric Coomer and discovered that Colorado Secretary of state link the following about Dr. Eric Coomer on page 26:

“Eric Coomer graduated from the University of California, Berkeley in 1997 with a Ph.D. in Nuclear Physics. After working in IT consulting for several years, Eric entered the elections industry in 2005 with Sequoia Voting Systems as Chief Software Architect. After three years with the company, Eric took over all development operations as Vice President of Engineering. When Sequoia was acquired by Dominion Voting Systems in 2010, Eric joined the DVS team as Vice President of US Engineering overseeing development in the Denver, Colorado office.

Recently, Eric has taken over as the Director of Product Strategy driving the creation of next generation products through close collaboration with customers, combined with a deep understanding of technology and the needs of Elections departments throughout the United States and abroad. Eric has been an active participant in the development of the IEEE common data format for Elections systems, as well as the working group for developing standards for Risk-Limiting Audits for elections results. When not designing new products, Eric supports large and small scale customers during Election season.”

I did some cursory research on Eric, but my conclusion was that he was either a part of the government or not relevant to the conversation. In other words, this was not a target I would

identify as being influential in Antifa. My conclusion was based on his credentials of having a PhD in Nuclear Physics. Did not add up for someone with that intelligence. I set it aside and concentrated my focus on the activist journalist who were actually Antifa members.

On October 15, 2020 I spoke at an FEC meeting in Bandimere Speedway. It was a rally around the unconstitutional actions of Jefferson County, Colorado government leadership to hurt Bandimere Speedway. I spoke and before the event started they escorted a suspected Antifa Journalist Erik Maulbetsch [Colorado Recorder] off the premises. In that meeting I talked about outing activist journalists who were Antifa and holding them accountable in our community for attacking organizations like FEC United that serve the community.

These activist journalists frequently slander people of faith, conservatives and call them names that defame them in the community. I had enough and warned that we would call them out by name. Maulbetsch wrote an article reflecting this as he was listening in online and decided to omit details about the meeting, causing the entire journalistic community to wonder if they were on the list. It had a positive effect contrary to their intentions.

On Friday November 6th, I received a forwarded article about Georgia irregularities on the election day. I normally do not read many of these articles because I am inundated with information both from FEC, and my company. I started reading it and noticed Eric Coomer was the spokesperson for a company called Dominion Voting Systems. I immediately stopped and started to go back through my notes to find the info on Eric Coomer. I then started research Dominion Voting Systems. The information became rather scary as everywhere I looked I found Eric's name. Some listing him as VP of Security and others calling him Director of Strategy and Security. I began my search for everything Eric Coomer, Dr. Eric Coomer and any information related to legal filings, RFPs, states using Dominion, Colorado uses and even areas in Colorado that do not use Dominion.

I then turned my attention to Eric Coomer's Facebook profile and page while I gathered information on correlating email addresses, profiles, screen names, etc. Searching Twitter, Reddit, Facebook, 4Chan, etc etc.

I was able to get screenshots of Eric Coomer's Facebook posts going back to 2016. What I discovered was disturbing. Anti-Trump rhetoric, posts referring to: Fuck USA, Fuck the Police, A.C.A.B., posts that were anti Conservative, and even posts being happy someone died. Then the bigger shocker. He reposted the Antifa "Manifesto" letter to Donald Trump. I knew that I had the right guy and someone that was clearly mentally unstable and radical. I started digging into the

code irregularities and tying all of the pieces together with the irregularities and the Dominion uses in the disputed states. The correlation was astonishing. I then found the information related to justifying voting machines being online and his justification that they had "hardware and IP address protection". This statement by itself is FALSE.

I then attempted to reach out to all sources to bring this information to light. Calling major news stations and attempting to connect with the DOJ.

I took the information to the listeners of an organization that I also own called Conservative Daily. We have a podcast that we do on weekdays. I felt I had enough information and was confident that the Eric on the conference call was the same Eric Coomer that worked for Dominion. I was also confident that given the Facebook and other information I was able to collect that Eric Coomer was interfering with the election and as he admits in one of his posts that people at his company think and feel the same way he does. I began to research his patents, who owns them, the pattern of states they acquired as clients.

I began to research the connection to Diane Feinstein, her husband, campaign manager, Clinton Foundation and became worried that the finger of radicals had taken away the voice of the American people in deciding the election. I used ARIMA analysis to show me trends on data and probability models to prove that they were in fact using code and technology to ghost votes, switch votes or even remove probable ballots completely. Code is random unless it is not. Since we are a data company and understand artificial intelligence and use of neural networks, we understand the capabilities of creating chaos in outcome based on weighted density of probable voters.

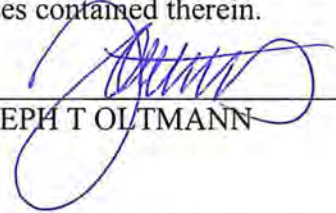
These statements are true and accurate to the best of my knowledge.



Joseph Oltmann

STATE OF COLORADO
COUNTY OF Douglas

Personally appeared before me, LYNN KIEFFER, a Notary Public in and for the aforesaid State and County, JOSEPH T OLTMANN, the within named bargainer, with whom I am personally acquainted and who, after being duly sworn, acknowledged that she executed the foregoing Agreement for the purposes contained therein.



JOSEPH T OLTMANN

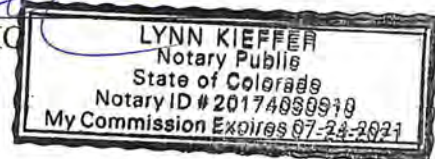
Sworn to and subscribed before me this 13th day of November, 2020.

My Commission Expires:

07-24-2021



NOTARY PUBLIC



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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

| | | |
|-------------------------------|---|---------------------------------|
| DONNA CURLING, ET AL., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | CIVIL ACTION |
| vs. |) | |
| |) | FILE NO. 1:17-cv-2989-AT |
| BRAD RAFFENSPERGER, |) | |
| ET AL., |) | |
| |) | |
| Defendants. |) | |

DECLARATION OF HARRI HURSTI

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

1. My name is Harri Hursti. I am over the age of 21 and competent to give this testimony. The facts stated in this declaration are based on my personal knowledge, unless stated otherwise.

2. My background and qualifications in voting system cybersecurity are set forth in my December 16, 2019 declaration. (Doc. 680-1, pages 37 *et seq*). I stand by everything in that declaration and in my August 21, 2020 declaration. (Doc. 800-2).

3. I am also an expert in ballot scanning because of extensive background in digital imaging prior by work researching election systems. In addition, in 2005 I started an open source project for scanning and auditing paper ballots from images. As a result, I am familiar with different scanner types, how scanner settings and image processing features change the images, and how file format choices affect the quality and accuracy of the ballots.

4. I am engaged as an expert in this case by Coalition for Good Governance.

5. In developing this declaration and opinion, I visited Atlanta to observe certain operations of the June 9, 2020 statewide primary, and the August 11 runoff. During the June 9 election, I was an authorized poll watcher in some locations and was a public observer in others. On August 11, I was authorized as an expert inspecting and observing under the Coalition for Good Governance's Rule 34 Inspection request in certain polling places and the Fulton County Election Preparation Center. As I will explain below in this declaration, my extensive experience in the area of voting system security and my observations of these elections lead to additional conclusions beyond those in my December 16, 2019 declaration. Specifically:

- a) the scanner and tabulation software settings being employed to determine which votes to count on hand marked paper ballots are likely causing clearly intentioned votes not to be counted;
- b) the voting system is being operated in Fulton County in a manner that escalates the security risk to an extreme level; and
- c) voters are not reviewing their BMD printed ballots, which causes BMD generated results to be un-auditable due to the untrustworthy audit trail.

Polling Place Observations

6. Election observation on Peachtree Christian Church. The ballot marking devices were installed so that 4 out of 8 touchscreen devices were clearly visible from the pollbook check in desk. Voter's selections could be effortlessly seen from over 50 ft away.

7. Over period of about 45 minutes, I only observed one voter who appeared to be studying the ballot after picking it up from the printer before casting it in the scanner. When voters do not fully verify their ballot prior to casting, the ballots cannot be considered a reliable auditable record.

8. The scanner would reject some ballots and then accept them after they were rotated to a different orientation. I noted that the scanner would vary in the amount of time that it took to accept or reject a ballot. The delay varied between 3

and 5 seconds from the moment the scanner takes the ballot until the scanner either accepts the ballot or rejects it. This kind of behavior is normal on general purpose operating systems multitasking between multiple applications, but a voting system component should be running only a single application without outside dependencies causing variable execution times.

9. Further research is necessary to determine the cause of the unexpected scanning delays. A system that is dedicated to performing one task repeatedly should not have unexplained variation in processing time. As security researcher, we are always suspicious about any unexpected variable delays, as those are common telltale signs of many issues, including a possibility of unauthorized code being executed. So, in my opinion changes of behaviors between supposedly identical machines performing identical tasks should always be investigated.

When ballots are the same and are produced by a ballot marking device, there should be no time difference whatsoever in processing the bar codes. Variations in time can be the result of many things - one of them is that the scanner encounters an error reading the bar code and needs to utilize error correcting algorithms to recover from that error. Further investigation is

necessary to determine the root cause of these delays, the potential impact of the error correcting algorithms if those are found to be the cause, and whether the delay has any impact upon the vote.

10. Election observation in Central Park Recreation Center. The Poll place manager told me that no Dominion trained technician had reported on location to help them that morning.

11. The ballot marking devices were originally installed in a way that voter privacy was not protected, as anyone could observe across the room how people are voting on about 2/3 devices.

12. The ballot scanner took between 4 and 6 seconds to accept the ballot. I observed only one ballot being rejected.

13. Generally, voters did not inspect the ballots after taking it from the printer and casting it into the scanner.

14. Election observation in Fanplex location. Samantha Whitley and Harrison Thweatt were poll watchers at the Fanplex polling location. They contacted me at approximately 9:10am about problems they were observing with the operation of the BMDs and Poll Pads and asked me to come to help them

understand the anomalies they were observing. I arrived at FanPlex at approximately 9:30am.

15. I observed that the ballot scanner located by a glass wall whereby standing outside of the building observe the scanning, would take between 6 and 7 seconds to either accept or reject the ballot.

16. For reasons unknown, on multiple machines, while voters were attempting to vote, the ballot marking devices sometimes printed “test” ballots. I was not able to take a picture of the ballot from the designated observation area, but I overheard the poll worker by the scanner explaining the issue to a voter which was sent back to the Ballot-Marking Device to pick up another ballot from the printer tray. Test ballots are intended to be used to test the system but without being counted by the system during an election. The ballot scanner in election settings rejects test ballots, as the scanners at FanPlex did. This caused confusion as the voters needed to return to the ballot-marking device to retrieve the actual ballot. Some voters returned the test ballot into the printer tray, potentially confusing the next voter. Had voters been reviewing the ballots at all before taking them to the scanner, they would have noticed the “Test Ballot” text on the ballot. I observed no voter really questioning a poll worker why a “Test” ballot was printed in the first place.

17. Obviously, during the election day, the ballot marking device should not be processing or printing any ballot other than the one the voter is voting. While the cause of the improper printing of ballots should be examined, the fact that this was happening at all is likely indicative of a wrong configuration given to the BMD, which in my professional opinion raises another question: Why didn't the device print only test ballots? And how can the device change its behavior in the middle of the election day? Is the incorrect configuration originating from the Electronic Pollbook System? What are the implications for the reliability of the printed ballot and the QR code being counted?

18. Election observation Park Tavern. The scanner acceptance delay did not vary as it had in previous locations and was consistently about 5 seconds from the moment the scanner takes the ballot, to the moment the scanner either accepts the ballot or rejects it. The variation between scanners at different locations is concerning because these are identical physical devices and should not behave differently while performing the identical task of scanning a ballot.

19. The vast majority of voters at Park Tavern did not inspect the ballots after taking them from the printer and before casting them in the scanner.

Fulton Tabulation Center Operation-Election Night, August 11, 2020

20. In Fulton County Election Preparation Center (“EPC”) on election night I reviewed certain operations as authorized by Rule 34 inspection.

21. I was permitted to view the operations of the upload of the memory devices coming in from the precincts to the Dominion Election Management System (“EMS”) server. The agreement with Fulton County was that I could review only for a limited period of time; therefore, I did not review the entire evening’s process. Also, Dominion employees asked me to move away from the monitors containing the information and messages from the upload process and error messages, limiting my ability to give a more detailed report with documentation and photographs of the screens. However, my vantage point was more than adequate to observe that system problems were recurring and the Dominion technicians operating the system were struggling with the upload process.

22. It is my understanding the same EMS equipment and software had been used in Fulton County’s June 9, 2020 primary election.

23. It is my understanding that the Dominion technician (“Dominic”) charged with operating the EMS server for Fulton County had been performing

these duties at Fulton County for several months, including during the June 9 primary.

24. During my August 11 visit, and a follow-up visit on August 17, I observed that the EMS server was operated almost exclusively by Dominion personnel, with little interaction with EPC management, even when problems were encountered. In my conversations with Derrick Gilstrap and other Fulton County Elections Department EPC personnel, they professed to have limited knowledge of or control over the EMS server and its operations.

25. Outsourcing the operation of the voting system components directly to the voting system vendors' personnel is highly unusual in my experience and of grave concern from a security and conflict of interest perspective. Voting system vendors' personnel have a conflict of interest because they are not inclined to report on, or address, defects in the voting systems. The dangers this poses is aggravated by the absence of any trained County personnel to oversee and supervise the process.

26. In my professional opinion, the role played by Dominion personnel in Fulton County, and other counties with similar arrangements, should be considered an elevated risk factor when evaluating the security risks of Georgia's voting system.

27. Based on my observations on August 11 and August 17, Dell computers running the EMS that is used to process Fulton county votes appeared not to have been hardened.

28. In essence, hardening is the process of securing a system by reducing its surface of vulnerability, which is larger when a system performs more functions; in principle it is to reduce the general purpose system into a single-function system which is more secure than a multipurpose one. Reducing available ways of attack typically includes changing default passwords, the removal of unnecessary software, unnecessary usernames or logins, grant accounts and programs with the minimum level of privileges needed for the tasks and create separate accounts for privileged operations as needed, and the disabling or removal of unnecessary services.

29. Computers performing any sensitive and mission critical tasks such as elections should unquestionably be hardened. Voting system are designated by the Department of Homeland Security as part of the critical infrastructure and certainly fall into the category of devices which should be hardened as the most fundamental security measure. In my experience, it is unusual, and I find it unacceptable for an EMS server not to have been hardened prior to installation.

30. The Operating System version in the Dominion Election Management computer, which is positioned into the rack and by usage pattern appears to be the main computer, is Windows 10 Pro 10.0.14393. This version is also known as the Anniversary Update version 1607 and it was released August 2, 2016. Exhibit A is a true and correct copy of a photograph that I took of this computer.

31. When a voting system is certified by the EAC, the Operating System is specifically defined, as Windows 10 Pro was for the Dominion 5.5-A system. Unlike consumer computers, voting systems do not and should not receive automatic “upgrades” to newer versions of the Operating System. without undergoing tests for conflicts with the new operating system software.

32. That computer and other computers used in Georgia’s system for vote processing appear to have home/small business companion software packages included. Exhibits B and C are true and correct copies of photographs that I took of the computer located in the rack and the computer located closest to the rack on the table to the right. The Start Menu shows a large number of game and entertainment software icons. As stated before, one of the first procedures of hardening is removal of all unwanted software, and removal of those game icons and the associated games and installers alongside with all other software which is not absolutely needed in the computer for election processing purposes would be

one of the first and most basic steps in the hardening process. In my professional opinion, independent inquiry should be promptly made of all 159 counties to determine if the Dominion systems statewide share this major deficiency.

33. Furthermore, when I asked the Dominion employee Dominic assigned to the Fulton County election server operation about the origin of the Windows operating system, he answered that he believed that “it has been provided by the State.”

34. Since Georgia’s Dominion system is new, it is a reasonable assumption that all machines in the Fulton County election network had the same version of Windows installed. However, not only the two computers displayed different entertainment software icons, but additionally one of the machines in Fulton’s group of election servers had an icon of computer game called “*Homescapes*” which is made by Playrix Holding Ltd., founded by Dmitry and Igor Bukham in Vologda, Russia. Attached as Exhibit C is a true and correct copy of a photograph that I took of the Fulton voting system computer” Client 02”. The icon for *Homescapes* is shown by the arrow on Exhibit C.

35. The *Homescapes* game was released in August 2017, one year after Fulton County’s operating system release. If the *Homescapes* game came with the operating system it would be unusual, because at the time of the release of

Homescapes, Microsoft had already released 3 major Microsoft Windows 10 update releases after build 14393 and before the release of that game. This calls into question whether all Georgia Dominion system computers have the same operating system version, or how the game has come to be having a presence in Fulton's Dominion voting system.

36. Although this Dominion voting system is new to Georgia, the Windows 10 operating system of at least the 'main' computer in the rack has not been updated for 4 years and carries a wide range of well-known and publicly disclosed vulnerabilities. At the time of this writing, The National Vulnerability Database maintained by National Institute of Standards and Technology lists 3,177 vulnerabilities mentioning "Windows 10 Pro" and 203 vulnerabilities are specifically mentioning "Windows 10 Pro 1607" which is the specific version number of the build 14393 that Dominion uses.

37. Even without internet connectivity, unhardened computers are at risk when those are used to process removable media. It was clear that when Compact Flash storage media containing the ballot images, audit logs and results from the precinct scanners were connected to the server, the media was automounted by the operating system. When the operating system is automounting a storage media, the operating system starts automatically to interact with the device. The zero-day

vulnerabilities exploiting this process has been recurrently discovered from all operating systems, including Windows. Presence of automount calls also into question presence of another setting which is always disabled in hardening process. It is autorun, which automatically executes some content on the removable media. While this is convenient for consumers, it poses extreme security risk.

38. Based on my experience and mental impression observing the Dominion technician's activities, Fulton County's EMS server management seems to be an *ad hoc* operation with no formalized process. This was especially clear on the manual processing of the memory cards storage devices coming in from the precincts on election night and the repeated access of the operating system to directly access filesystem, format USB devices, etc. This kind of operation is naturally prone to human errors. I observed personnel calling on the floor asking if all vote carrying compact flash cards had been delivered from the early voting machines for processing, followed by later finding additional cards which had been overlooked in apparent human error. Later, I heard again one technician calling on the floor asking if all vote carrying compact flashes had been delivered. This clearly demonstrates lack of inventory management which should be in place to ensure, among other things, that no rogue storage devices would be inserted into the computer. In response, 3 more compact flash cards were hand-delivered. Less

than 5 minutes later, I heard one of the county workers say that additional card was found and was delivered for processing. All these devices were trusted by printed label only and no comparison to an inventory list of any kind was performed.

39. In addition, operations were repeatedly performed directly on the operating system. Election software has no visibility into the operations performed directly on the operating system, and therefore those are not included in election system event logging. Those activities can only be partially reconstructed from operating system logs – and as these activities included copying election data files, election software log may create false impression that the software is accessing the same file over a period of time, while in reality the file could had been replaced with another file with the same name by activities commanded to the operating system. Therefore, any attempt to audit the election system operated in this manner must include through analysis of all operating system logs, which complicates the auditing process. Unless the system is configured properly to collect file system auditing data is not complete. As the system appears not to be hardened, it is unlikely that the operating system has been configured to collect auditing data.

40. A human error when operating live election system from the operating system can result in a catastrophic event destroying election data or even rendering the system unusable. Human error is likely given the time pressure involved and,

at least in Fulton County, no formal check lists or operating procedures were followed to mitigate the human error risk. The best practice is to automate trivial tasks to reduce risk of human error, increase the quality assurance of overall operations and provide auditability and transparency by logging.

41. Uploading of memory cards had already started before I arrived at EPC. While one person was operating the upload process, the two other Dominion employees were troubleshooting issues which seemed to be related to ballot images uploads. I repeatedly observed error messages appearing on the screen of the EMS server. I was not able to get picture of the errors on August 11th, I believe the error was the same or similar that errors recurring August 17th as shown on Exhibit D and discussed later in this declaration. Dominion employees were troubleshooting the issue with ‘trial-and-error’ approach. As part of this effort they accessed “Computer Management” application of Windows 10 and experimented with trouble shooting the user account management feature. This demonstrates that they had complete access to the computer. This means there are no meaningful access separation and privileges and roles controls protecting the county’s primary election servers. This also greatly amplifies the risk of catastrophic human error and malicious program execution.

42. I overheard the Dominion technician's conversation that they had issues with file system structure and "need 5 files out of EMS server and paste. Delete everything out of there and put it there." To communicate the gravity of the situation to each other they added "Troubleshooting in the live environment". These conversations increased the mental image that they were not familiar the issue they were troubleshooting.

43. After about 45 minutes of trying to solve the issue by instructions received over the phone, the two Dominion employees' (who had been troubleshooting) behavior changed. The Dominion staff member walked behind the server rack and made manual manipulations which could not be observed from my vantage point. After that they moved with their personal laptops to a table physically farther away from the election system and stopped trying different ways to work around the issue in front of the server, and no longer talked continuously with their remote help over phone.

44. In the follow-up-calls I overheard them ask people on the other end of the call to check different things, and they only went to a computer and appeared to test something and subsequently take a picture of the computer screen with a mobile phone and apparently send it to a remote location.

45. Based on my extensive experience, this all created a strong mental impression that the troubleshooting effort was being done remotely over remote access to key parts of the system. Additionally, new wireless access point with a hidden SSID access point name appeared in the active Wi-Fi stations list that I was monitoring, but it may have been co-incidental. Hidden SSIDs are used to obscure presence of wireless networking from casual observers, although they do not provide any real additional security.

46. If in fact remote access was arranged and granted to the server, this has gravely serious implications for the security of the new Dominion system. Remote access, regardless how it is protected and organized is always a security risk, but furthermore it is transfer of control out of the physical perimeters and deny any ability to observe the activities.

47. I also observed USB drives marked with the Centon DataStick Pro Logo with no visible inventory control numbering system being taken repeatedly from the EMS server rack to the Fulton managers' offices and back. The Dominion employee told me that the USB drives were being taken to the Election Night Reporting Computer in another office. This action was repeated several times during the time of my observation. Carrying generic unmarked and therefore unidentifiable media out-of-view and back is a security risk – especially when the

exact same type of devices was piled on the desk near the computer. During the election night, the Dominion employees reached to storage box and introduced more unmarked storage devices into the ongoing election process. I saw no effort made to maintain a memory card inventory control document or chain of custody accounting for memory cards from the precincts.

48. I also visited the EPC on August 17. During that visit, the staff working on uploading ballots for adjudication experienced an error which appeared similar to the one on election night. This error was repeated with multitude of ballots and at the time we left the location, the error appeared to be ignored, rather than resolved. (EXHIBIT D - the error message and partial explanation of the error being read by the operator.).

49. The security risks outlined above – operating system risks, the failure to harden the computers, performing operations directly on the operating systems, lax control of memory cards, lack of procedures, and potential remote access, are extreme and destroy the credibility of the tabulations and output of the reports coming from a voting system.

50. Such a risk could be overcome if the election were conducted using hand marked paper ballots, with proper chain of custody controls. For elections conducted with hand marked paper ballots, any malware or human error involved

in the server security deficiencies or malfunctions could be overcome with a robust audit of the hand marked paper ballots and in case of irregularities detected, remedied by a recount. However, given that BMD ballots are computer marked, and the ballots therefore unauditable for determining the result, no recovery from system security lapses is possible for providing any confidence in the reported outcomes.

Ballot Scanning and Tabulation of Vote Marks

51. I have been asked to evaluate the performance and reliability of Georgia's Dominion precinct and central count scanners in the counting of votes on hand marked paper ballots.

52. On or about June 10th, Jeanne Dufort and Marilyn Marks called me to seek my perspective on what Ms. Dufort said she observed while serving as a Vote Review Panel member in Morgan County. Ms. Dufort told me that she observed votes that were not counted as votes nor flagged by the Dominion adjudication software.

53. Because of the ongoing questions this raised related to the reliability of the Dominion system tabulation of hand marked ballots, I was asked by Coalition Plaintiffs to conduct technical analysis of the scanner and tabulation accuracy. That analysis is still in its early stages.

54. Before addressing the particulars of my findings and research into the accuracy of Dominion's scanning and tabulation, I will address the basic process by which an image on a voted hand marked paper ballot is processed by scanner and tabulation software generally. It is important to understand that the Dominion scanners are Canon off the shelf scanners and their embedded software were designed for different applications than ballot scanning which is best conducted with scanners specifically designed for detecting hand markings on paper ballots.

55. Contrary of public belief, the scanner is not taking a picture of the paper. The scanner is illuminating the paper with a number of narrow spectrum color lights, typically 3, and then using software to produce an approximation what the human eye would be likely to see if there would had been a single white wide-spectrum light source. This process takes place in partially within the scanner and embedded software in the (commercial off the shelf) scanner and partially in the driver software in the host computer. It is guided by number of settings and configurations, some of which are stored in the scanner and some in the driver software. The scanner sensors gather more information than will be saved into the resulting file and another set of settings and configurations are used to drive that part of the process. The scanners also produce anomalies which are automatically removed from the images by the software. All these activities are performed

outside of the Dominion election software, which is relying on the end product of this process as the input.

56. I began reviewing Dominion user manuals in the public domain to further investigate the Dominion process.

57. On August 14, I received 2 sample Fulton County August 11 ballots of high-speed scanned ballot from Rhonda Martin, who stated that she obtained them from Fulton County during Coalition Plaintiff's discovery. The image characteristics matched the file details I had seen on the screen in EPC. The image is TIFF format, about 1700 by 2200 pixels with 1-bit color depth (= strictly black or white pixels only) with 200 by 200 dots per square inch ("dpi") resolution resulting in files that are typically about 64 or 73 kilo bytes in size for August 11 ballots. With this resolution, the outer dimension of the oval voting target is about 30 by 25 pixels. The oval itself (that is, the oval line that encircles the voting target) is about 2 pixels wide. The target area is about 450 pixels; the area of the target a tight bounding box would be 750 pixels and the oval line encircling the target is 165 pixels. In these images, the oval itself represented about 22% value in the bounding box around the vote target oval.

58. Important image processing decisions are done in scanner software and before election software threshold values are applied to the image. These

scanner settings are discussed in an excerpt Dominion's manual for ICC operations. My understanding is that the excerpt of the Manual was received from Marilyn Marks who stated that she obtained it from a Georgia election official in response to an Open Records request. Attached as Exhibit E is page 9 of the manual. Box number 2 on Exhibit E shows that the settings used are not neutral factory default settings.

59. Each pixel of the voters' marks on a hand marked paper ballot will be either in color or gray when the scanner originally measures the markings. The scanner settings affect how image processing turns each pixel from color or gray to either black or white in the image the voting software will later process. This processing step is responsible for major image manipulation and information reduction before the election software threshold values are calculated. This process has a high risk of having an impact upon how a voter mark is interpreted by the tabulation software when the information reduction erases markings from the scanned image before the election software processes it.

60. In my professional opinion, any decision by Georgia's election officials about adopting or changing election software threshold values is premature before the scanner settings are thoroughly tested, optimized and locked.

61. The impact of the scanner settings is minimal for markings made with a black felt pen but can be great for markings made with any color ballpoint pens. To illustrate this, I have used standard color scanning settings and applied then standard conversion from a scanned ballot vote target with widely used free and open source image processing software “GNU Image Manipulation Program version 2.10.18” EXHIBIT G shows the color image being converted with the software’s default settings from color image to Black-and-White only. The red color does not meet the internal conversion algorithm criteria for black, therefore it gets erased to white instead.

62. Dominion manual for ICC operations clearly show that the scanner settings are changed from neutral factory default settings. EXHIBIT H shows how these settings applied different ways alter how a blue marking is converted into Black-and-White only image.

63. The optimal scanner settings are different for each model of scanner and each type of paper used to print ballots. Furthermore, because scanners are inherently different, the manufacturers use hidden settings and algorithms to cause neutral factory settings to produce similar baseline results across different makes and models. This is well-studied topic; academic and image processing studies published as early as 1979 discuss the brittleness of black-or-white images in

conversion. Subsequently, significance for ballot counting has been discussed in academic USENIX conference peer-reviewed papers.

64. On the August 17th at Fulton County Election Preparation Center Professor Richard DeMillo and I participated in a scan test of August 11 test ballots using a Fulton County owned Dominion precinct scanner. Two different ballot styles were tested, one with 4 races and one with 5 races. Attached as Exhibits I and J show a sample ballots with test marks.

65. A batch of 50 test ballots had been marked by Rhonda Martin with varying types of marks and varying types of writing instruments that a voter might use at home to mark an absentee ballot. Professor DeMillo and I participated in marking a handful of ballots.

66. Everything said here concerning the August 17 test is based on a very preliminary analysis. The scanner took about 6 seconds to reject the ballots, and one ballot was only acceptable “headfirst” while another ballot only “tail first.” Ballot scanners are designed to read ballots “headfirst” or “tail first,” and front side and backside and therefore there should not be ballots which are accepted only in one orientation. I observed the ballots to make sure that both ballots had been cleanly separated from the stub and I could not identify any defects of any kind on the ballots.

67. There was a 15 second cycle from the time the precinct scanner accepted a ballot to the time it was ready for the next ballot. Therefore, the maximum theoretical capacity with the simple 5 race ballot is about 4 ballots per minute if the next ballot is ready to be fed into the scanner as soon as the scanner was ready to take it. In a real-world voting environment, it takes considerably longer because voters move away from the scanner, the next voter must move in and subsequently figure where to insert the ballot. The Dominion precinct scanner that I observed was considerably slower than the ballot scanners I have tested over the last 15 years. This was done with a simple ballot, and we did not test how increase of the number of races or vote targets on the ballot would affect the scanning speed and performance.

68. Though my analysis is preliminary, this test reveals that a significant percentage of filled ovals that would to a human clearly show voter's intent failed to register as a vote on the precinct count scanner.

69. The necessary testing effort has barely begun at the time of this writing, as only limited access to equipment has been made available. I have not had access to the high-volume mail ballot scanner that is expected to process millions of mail ballots in Georgia's upcoming elections. However, initial results suggest that significant revisions must be made in the scanning settings to avoid a

widespread failure to count certain valid votes that are not marked as filled in ovals. Without testing, it is impossible to know, if setting changes alone are sufficient to cure the issue.

Scanned Ballot Tabulation Software Threshold Settings

70. Georgia is employing a Dominion tabulation software tool called “Dual Threshold Technology” for “marginal marks.” (See Exhibit M) The intent of the tool is to detect voter marks that could be misinterpreted by the software and flag them for review. While the goal is admirable, the method of achieving this goal is quite flawed.

71. While it is compelling from development cost point of view to use commercial off the shelf COTS scanners and software, it requires additional steps to ensure that the integration of the information flow is flawless. In this case, the software provided by the scanner manufacturer and with settings and configurations have great impact in how the images are created and what information is removed from the images before the election software processes it. In recent years, many defective scanner software packages have been found. These software flaws include ‘image enhancement’ features which have remained enabled even when the feature has been chosen to be disabled from the scanner software provided by the manufacturer. An example of dangerous feature to keep

enabled is ‘Punch Hole Removal’, intended to make images of documents removed from notebook binders to look more aesthetically pleasing. The software can and in many cases will misinterpret a voted oval as a punch hole and erase the vote from the image file and to make this worse, the punch holes are expected to be found only in certain places near the edge of the paper, and therefore it will erase only votes from candidates whose targets are in those target zones.

72. Decades ago, when computing and storage capacity were expensive black-and-white image commonly meant 1-bit black-or-white pixel images like used by Dominion system. As computer got faster and storage space cheaper during the last 2-3 decades black-and-white image has become by default meaning 255 shades of gray grayscale images. For the purposes of reliable digitalization of physical documents, grayscale image carries more information from the original document for reliable processing and especially when colored markings are being processed. With today’s technology, the difference in processing time and storage prices between grayscale and 1-bit images has become completely meaningless, and the benefits gained in accuracy are undeniable.

73. I am aware that the Georgia Secretary of State’s office has stated that Georgia threshold settings are national industry standards for ballot scanners (Exhibit K). This is simply untrue. If, there were an industry standard for that, it

would be part of EAC certification. There is no EAC standard for such threshold settings. As mentioned before, the optimal settings are products of many elements. The type of the scanner used, the scanner settings and configuration, the type of the paper used, the type of the ink printer has used in printing the ballots, color dropout settings, just to name few. Older scanner models, which were optical mark recognitions scanners, used to be calibrated using calibration sheet – similar process is needed to be established for digital imaging scanners used this way as the ballot scanners.

74. Furthermore, the software settings in Exhibit E box 2 show that the software is instructed to ignore all markings in red color (“Color drop-out: Red”), This clearly indicates that the software was expecting the oval to be printed in Red and therefore it will be automatically removed from the calculation. The software does not anticipate printed black ovals as used in Fulton County. Voters have likely not been properly warned that any pen they use which ink contains high concentration of red pigment particles is at risk of not counting, even if to the human eye the ink looks very dark.

75. I listened to the August 10 meeting of the State Board of Elections as they approved a draft rule related to what constitutes a vote, incorporating the following language:

Ballot scanners that are used to tabulate optical scan ballots marked by hand shall be set so that:

- 1. Detection of 20% or more fill-in of the target area surrounded by the oval shall be considered a vote for the selection;*
- 2. Detection of less than 10% fill-in of the target area surrounded by the oval shall not be considered a vote for that selection;*
- 3. Detection of at least 10% but less than 20% fill-in of the target area surrounded by the oval shall flag the ballot for adjudication by a vote review panel as set forth in O.C.G.A. 21-2-483(g). In reviewing any ballot flagged for adjudication, the votes shall be counted if, in the opinion of the vote review panel, the voter has clearly and without question indicated the candidate or candidates and answers to questions for which such voter desires to vote.*

76. The settings discussed in the rule are completely subject to the scanner settings. How the physical marking is translated into the digital image is determined by those values and therefore setting the threshold values without at the same time setting the scanner settings carries no value or meaning. If the ballots will be continuing to be printed with black only, there is no logic in having any drop-out colors.

77. Before the State sets threshold standards for the Dominion system, extensive testing is needed to establish optimal configuration and settings for each step of the process. Also, the scanners are likely to have settings additional configuration and settings which are not visible menus shown in the manual excerpt. All those should be evaluated and tested for all types of scanners approved for use in Georgia, including the precinct scanners

78. As temporary solution, after initial testing, the scanner settings and configuration should be locked and then a low threshold values should be chosen. All drop-out colors should be disabled. This will increase the number of ballots chosen for human review and reduce the number of valid votes not being counted as cast.

Logic and Accuracy Testing

79. Ballot-Marking Device systems inherits the same well-documented systemic security issues embedded in direct-recording electronic (DRE) voting machine design. Such design flaws eventually are causing the demise of DRE voting system across the country as it did in Georgia. In essence the Ballot Marking Device is a general-purpose computer running a general-purpose operating system with touchscreen that is utilized as a platform to run a software, very similar to DRE by displaying a ballot to the voter and recording the voter's intents. The main difference is that instead of recording those internally digitally, it prints out a ballot summary card of voter's choices.

80. Security properties of this approach would be positively different from DREs if the ballot contained only human-readable information and all voters are required to and were capable of verifying their choices from the paper ballot summary. That of course is unrealistic.

81. When voter fails to inspect the paper ballot and significant portion of the information is not in human readable form as a QR barcode, Ballot-Marking Device based voting effectively inherits most of the negative and undesirable security and reliability properties directly from DRE paradigm, and therefore should be subject to the same testing requirements and mitigation strategies as DREs.

82. In response to repeating myriad of issues with DREs, which have been attributed to causes from screen calibration issues to failures in ballot definition configuration distribution, a robust Logic & Accuracy testing regulation have been established. These root causes are present in BMDs and therefore should be evaluated in the same way as DREs have been.

I received the Georgia Secretary of State's manual "Logic and Accuracy Procedures" "Version 1.0 January 2020 from Rhonda Martin. Procedure described in section D "Testing the BMD and Printer" is taking significant shortcuts, presumably to cut the labor work required. (Section D is attached as Exhibit L) These shortcuts significantly weaken the security and reliability posture of the system and protections against already known systemic pitfalls, usability predicaments and security inadequacies.

CONCLUSIONS

83. The scanner software and tabulation software settings and configurations being employed to determine which votes to count on hand marked paper ballots are likely causing clearly intentioned votes not to be counted as cast.

84. The method of using 1-bit images and calculated relative darkness values from such pre-reduced information to determine voter marks on ballots is severely outdated and obsolete. It artificially and unnecessarily increases the failure rates to recognize votes on hand-marked paper ballots. As a temporary mitigation, optimal configurations and settings for all steps of the process should be established after robust independent testing to mitigate the design flaw and augment it with human assisted processes, but that will not cure the root cause of the software deficiency which needs to be addressed.

85. The voting system is being deployed, configured and operated in Fulton County in a manner that escalates the security risk to an extreme level and calls into question the accuracy of the election results. The lack of well-defined process and compliance testing should be addressed immediately using independent experts. The use and the supervision of the Dominion personnel operating Fulton County's Dominion Voting System should be evaluated.

86. Voters are not reviewing their BMD printed ballots before scanning and casting them, which causes BMD-generated results to be un-auditable due to the untrustworthy audit trail. Furthermore, because BMDs are inheriting known fundamental architectural deficiencies from DREs, no mitigation and assurance measures can be weakened, including but not limited to Logic and Accuracy Testing procedures.

This 24th day of August 2020.



Harri Hursti

EXHIBIT A:

| Item | Value |
|---------------------------------|--|
| OS Name | Microsoft Windows 10 Pro |
| Version | 10.0.14393 Build 14393 |
| Other OS Description | Not Available |
| OS Manufacturer | Microsoft Corporation |
| System Name | EMSCIENT01 |
| System Manufacturer | Dell Inc. |
| System Model | Precision Tower 3431 |
| System Type | x64-based PC |
| System SKU | 0942 |
| Processor | Intel(R) Core(TM) i5-9500 CPU @ 3.00GHz, 3000 Mhz, 6 Core(s), 6 Logical Pro... |
| BIOS Version/Date | Dell Inc. 1.1.6, 8/29/2019 |
| SMBIOS Version | 3.1 |
| Embedded Controller Version | 255.255 |
| BIOS Mode | UEFI |
| BaseBoard Manufacturer | Dell Inc. |
| BaseBoard Model | Not Available |
| BaseBoard Name | Base Board |
| Platform Role | Desktop |
| Secure Boot State | On |
| PCR7 Configuration | Elevation Required to View |
| Windows Directory | C:\Windows |
| System Directory | C:\Windows\system32 |
| Boot Device | \Device\HarddiskVolume3 |
| Locale | United States |
| Hardware Abstraction Layer | Version = "10.0.14393.0" |
| User Name | EMSCIENT01\emsadmin |
| Time Zone | Eastern Daylight Time |
| Installed Physical Memory (RAM) | 16.0 GB |
| Total Physical Memory | 15.8 GB |
| Available Physical Memory | 11.6 GB |
| Total Virtual Memory | 18.2 GB |
| Available Virtual Memory | 13.2 GB |

EXHIBIT B:



EXHIBIT C:



EXHIBIT D:

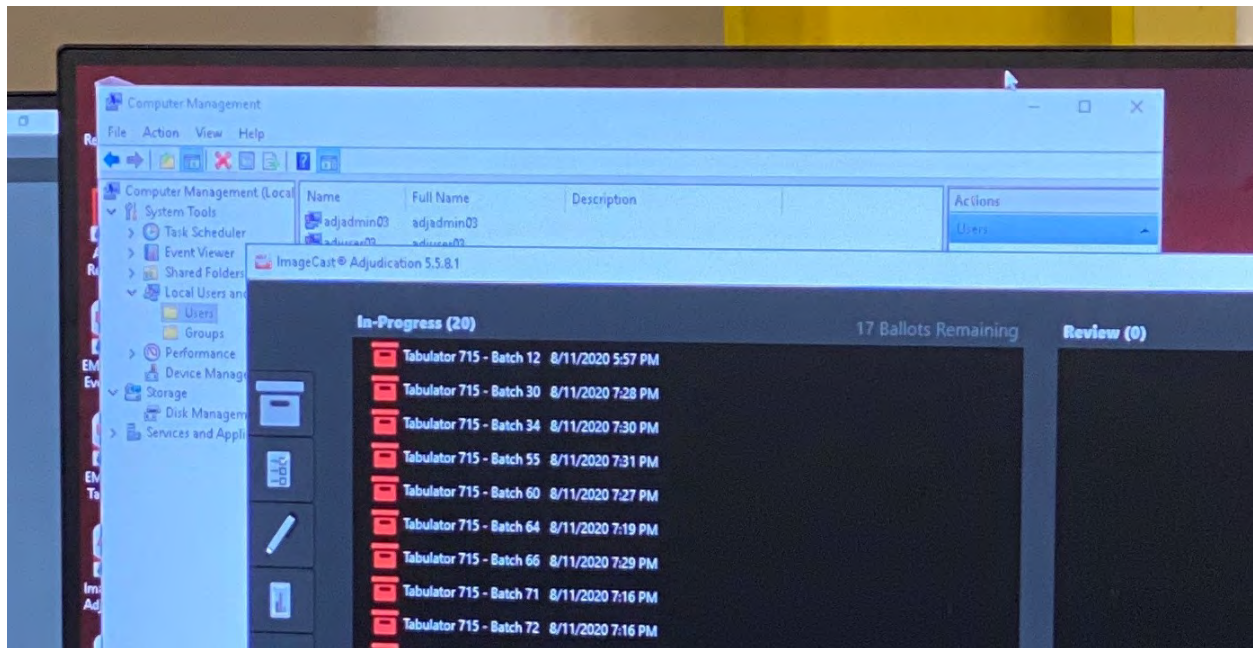


EXHIBIT E:

ICC SCANNER DRIVER SETTINGS
DOMINION VOTING

1

- Click on the **ADMINISTRATOR MODE** icon in the lower left corner of the window. Enter the Supervisor password.
- Click the **CONFIGURATION** button option on the left side of the window then click the **Properties** button located in the lower **Scanner** section.

2 Verify/select the following settings:

- Color Drop-out:** Red
- Detect by Length:** Not selected
- Detect by Ultrasonic:** Selected
- Deskew:** Selected
- Edge Cleanup:** Selected
- Doc Orientation:** Portrait
- Brightness:** Set to 90
- Contrast:** 4
- Gamma:** Not selected
- Moire Reduction:** Not selected
- Imprinter:** Not selected

Click the **Apply** button then click the **OK** button.

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EXHIBIT F:

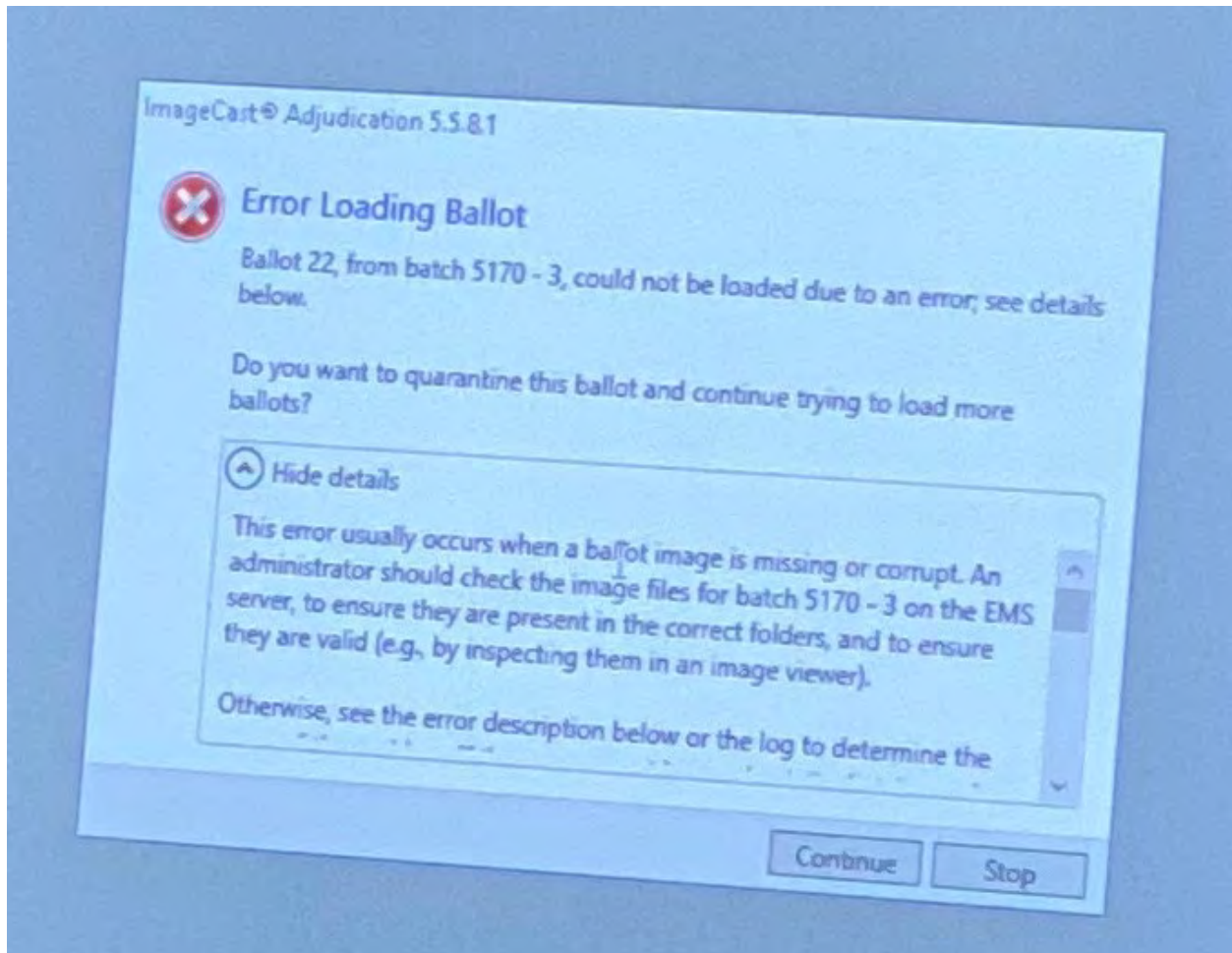


EXHIBIT G:



EXHIBIT H:



EXHIBIT I:

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FULTON COUNTY
993-SC13

OFFICIAL ABSENTEE/PROVISIONAL/EMERGENCY BALLOT

**OFFICIAL DEMOCRATIC PARTY PRIMARY AND
NONPARTISAN GENERAL ELECTION RUNOFF BALLOT
OF THE STATE OF GEORGIA
AUGUST 11, 2020**

To vote, blacken the Oval (●) next to the candidate of your choice. To vote for a person whose name is not on the ballot, manually WRITE his or her name in the write-in section and blacken the Oval (●) next to the write-in section. If you desire to vote YES or NO for a PROPOSED QUESTION, blacken the corresponding Oval (●). Use only blue or black pen or pencil.

Do not vote for more candidates than the number allowed for each specific office. Do not cross out or erase. If you erase or make other marks on the ballot or tear the ballot, your vote may not count.

If you change your mind or make a mistake, you may return the ballot by writing "Spoiled" across the face of the ballot and return envelope. You may then mail the spoiled ballot back to your county board of registrars, and you will be issued another official absentee ballot. Alternatively, you may surrender the ballot to the poll manager of an early voting site within your county or the precinct to which you are assigned. You will then be permitted to vote a regular ballot.

"I understand that the offer or acceptance of money or any other object of value to vote for any particular candidate, list of candidates, issue, or list of issues included in this election constitutes an act of voter fraud and is a felony under Georgia law." [O.C.G.A. 21-2-284(e) and 21-2-383(a)]

| | |
|--|---|
| <p>For State Representative In the General Assembly From 65th District (Vote for One)</p> <p><input type="radio"/> Sharon Beasley-Teague (Incumbent)</p> <p><input checked="" type="radio"/> Mandisha A. Thomas</p> | <p>NONPARTISAN GENERAL ELECTION RUNOFF</p> <p>For Judge, Superior Court of the Atlanta Judicial Circuit (To Succeed Constance C. Russell) (Vote for One)</p> <p><input checked="" type="radio"/> Melynee Leftridge Harris</p> <p><input type="radio"/> Tamika Hrobowski-Houston</p> |
| <p>For District Attorney of the Atlanta Judicial Circuit (Vote for One)</p> <p><input type="radio"/> Paul Howard (Incumbent)</p> <p><input checked="" type="radio"/> Fani Willis</p> | <p>For Member, Fulton County School Board District 4 (Vote for One)</p> <p><input checked="" type="radio"/> Franchesca Warren</p> <p><input type="radio"/> Sandra C. Wright</p> |
| <p>For Sheriff (Vote for One)</p> <p><input checked="" type="radio"/> Theodore "Ted" Jackson (Incumbent)</p> <p><input type="radio"/> Patrick "Pat" Labat</p> | |

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EXHIBIT J:

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FULTON COUNTY
802-UC01A

OFFICIAL ABSENTEE/PROVISIONAL/EMERGENCY BALLOT

**OFFICIAL DEMOCRATIC PARTY PRIMARY AND
NONPARTISAN GENERAL ELECTION RUNOFF BALLOT
OF THE STATE OF GEORGIA
AUGUST 11, 2020**

To vote, blacken the Oval (●) next to the candidate of your choice. To vote for a person whose name is not on the ballot, manually WRITE his or her name in the write-in section and blacken the Oval (●) next to the write-in section. If you desire to vote YES or NO for a PROPOSED QUESTION, blacken the corresponding Oval (●). Use only blue or black pen or pencil.

Do not vote for more candidates than the number allowed for each specific office. Do not cross out or erase. If you erase or make other marks on the ballot or tear the ballot, your vote may not count.

If you change your mind or make a mistake, you may return the ballot by writing "Spoiled" across the face of the ballot and return envelope. You may then mail the spoiled ballot back to your county board of registrars, and you will be issued another official absentee ballot. Alternatively, you may surrender the ballot to the poll manager of an early voting site within your county or the precinct to which you are assigned. You will then be permitted to vote a regular ballot.

*I understand that the offer or acceptance of money or any other object of value to vote for any particular candidate, list of candidates, issue, or list of issues included in this election constitutes an act of voter fraud and is a felony under Georgia law. (O.C.G.A. 21-2-284(e) and 21-2-383(a))

| | | |
|--|---|---|
| <p>For State Representative In the General Assembly From 65th District (Vote for One)</p> <p><input checked="" type="radio"/> Sharon Beasley-Teague (Incumbent)</p> <p><input type="radio"/> Mandisha A. Thomas</p> | <p>NONPARTISAN GENERAL ELECTION RUNOFF</p> <p>For Judge, Superior Court of the Atlanta Judicial Circuit (To Succeed Constance C. Russell) (Vote for One)</p> <p><input type="radio"/> Melynee Leftridge Harris</p> <p><input checked="" type="radio"/> Tamika Hrobowski-Houston</p> | <p><i>Outstaked on 2nd run concluded rely Sarah Could in first pass</i></p> |
| <p>For District Attorney of the Atlanta Judicial Circuit (Vote for One)</p> <p><input type="radio"/> Paul Howard (Incumbent)</p> <p><input checked="" type="radio"/> Fani Willis</p> | | |
| <p>For Sheriff (Vote for One)</p> <p><input type="radio"/> Theodore "Ted" Jackson (Incumbent)</p> <p><input checked="" type="radio"/> Patrick "Pat" Labat</p> | | |

EXHIBIT K:



Gabriel Sterling
@GabrielSterling



Replying to [@MarilynRMarks1](#) [@rahulbali](#) and 9 others

Again, all Central scanners were set at the industry standard 0-13% is not a mark (the oval is 5%) 14-28% is the ambiguous level to be checked by review panels, 29%+ is a mark. You ar pointing out the inherent issues with HMPBs that we don't see with BMD marked ballots.

8:02 PM · Jun 13, 2020 from [Georgia, USA](#) · [Twitter for iPhone](#)



EXHIBIT L:



- Create a voter card from Poll Pad for each unique ballot style within the designated Polling Location
 - Recommend labels be placed on card identifying what ballot style will be displayed by BMD once card is inserted
 - BMD removes the activation code from the Voter Card once used, therefore create the card again from Poll Pad after each use by a BMD

D. Testing the BMD and Printer

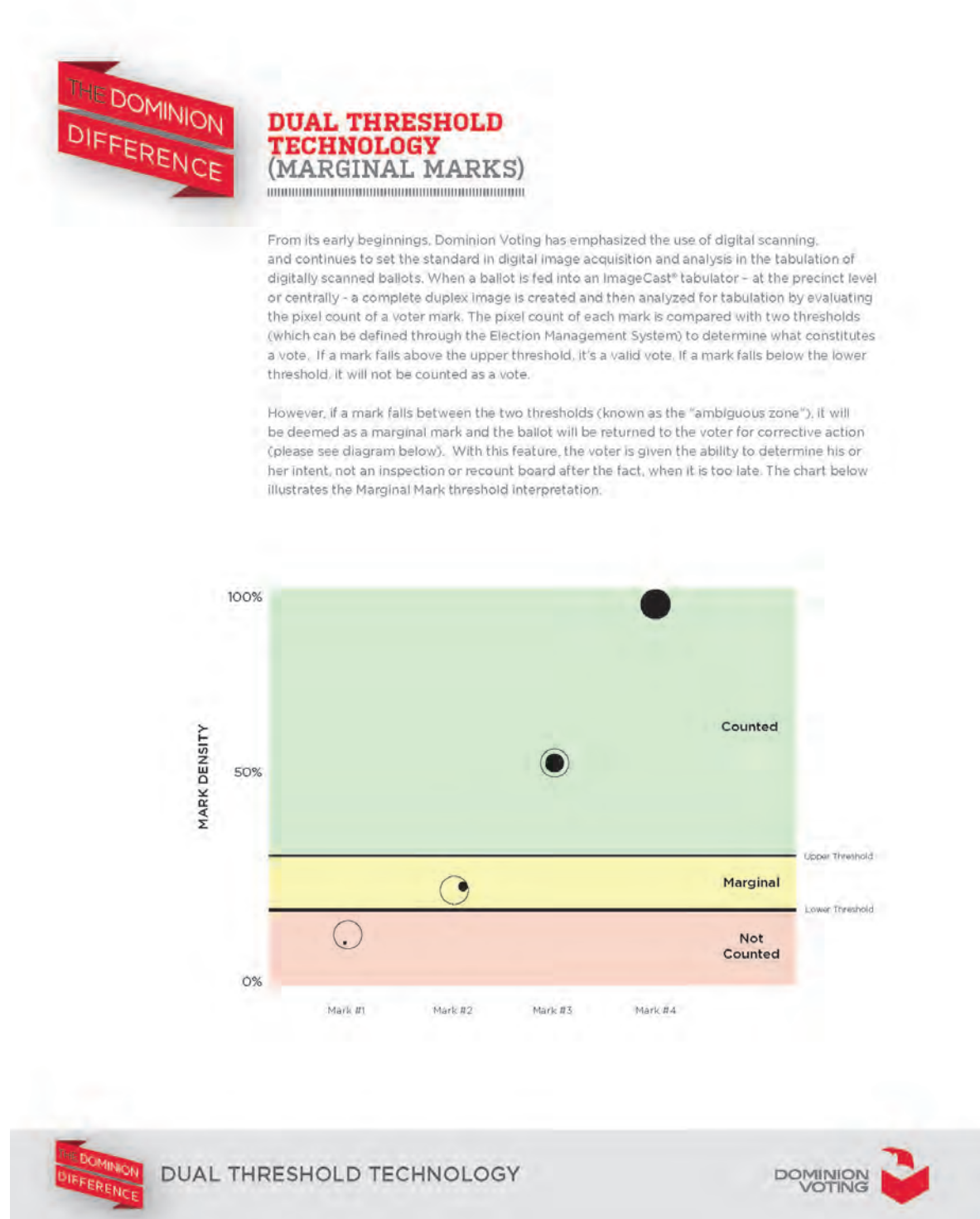
Use a combination of Poll Worker Card with Ballot Activation Codes for the polling location, and Voter Cards created from a Poll Pad loaded with the LA/Advance Voting dataset to bring up ballots on the BMD

- Produce at least one printed ballot from each BMD assigned to the polling location
- Produce a test deck from the BMDs assigned to the polling location for each unique ballot style within the polling location. The test deck must contain at least one vote for each candidate listed in each race within the unique ballot style
 - **Example:** Ballot from BMD 1 contains a vote for only the first candidate in each race listed on Ballot Style 1, Ballot from BMD 2 contains a vote only for the second candidate in each race on Ballot Style 1, and continue through the line of devices until all candidates in all races within the unique ballot style have received a single vote
 - **If Number of BMDs outnumber the number of vote positions on the unique ballot style,** start the vote pattern over until all BMDs have produced one printed ballot
 - **If Number of unique ballot styles in the polling place is greater than 1,** once the vote pattern is complete for a unique ballot style, proceed to the next BMD in line to start the review of the next unique Ballot Style
 - **All unique ballot styles do not have to be tested on each BMD**
- Review BMD-generated Test Deck and confirm the vote content before placing in the designated Polling Place Scanner

E. Testing the Polling Place Scanner

- Scan the BMD-generated Test Deck into the Polling Place Scanner
- Scan one blank optical scan ballot style(s) associated to the Polling Place to verify the Polling Place Scanner will recognize the ballot style in case of emergency
- Verify Scanner(s) shows a number of Ballot Cast equal to the number of ballots in the BMD-generated test deck plus the scanned blank Optical Scan ballot styles
- Firmly place the Security Key Tab in the Security Key Slot
- Touch Close Polls
- Enter the passcode
- Touch Enter
- Touch Yes
- Touch No for additional tapes (Scanner will automatically produce 3 copies of the closing tape)

EXHIBIT M:



STATEMENT BY ANA MERCEDES DÍAZ CARDOZO

I, Ana Mercedes Díaz Cardozo, hereby declare the following:

1. My name is Ana Mercedes Díaz Cardozo. I'm known as Ana Diaz by many. I am an adult of the sound mind and was born in Caracas, Venezuela on March 24, 1960. I'm a naturalized American citizen. I reside at 923 Gulf Stream Court, Weston, Florida 33327.

2. I make this statement voluntarily and on my own initiative. I have not been promised, nor do I expect to receive anything in exchange for my testimony and give this statement. I have no expectation of any benefit or reward and understand that there are those who can try to hurt me for what I say in this statement.

3. I moved from Venezuela to the United States in 2004 due to political corruption and rapid decline in my home country of Venezuela. I want to alert the public and let the world know the truth about corruption, manipulation, and lies committed through a conspiracy of individuals and businesses with the intention of betraying the honest people of the United States and its legally constituted institutions and fundamental rights as citizens. This conspiracy began more than a decade ago in Venezuela and has spread to countries around the world. It is a conspiracy to unjustly gain and maintain power and wealth. These are political leaders, powerful companies, and others whose purpose is to gain and maintain power by changing people's free will and subverting the proper course of governing.

4. After graduating from high school, I attended the University of Santa Maria in Caracas, Venezuela and graduated as a lawyer in 1987. Then I studied a postgraduate degree in administrative law at the University of Central Venezuela. Before I could submit my thesis for a Master's degree in Administrative Law, I moved to the United States. I'm certified as an arbiter of international trade.

5. I was a career official for 25 years at the Supreme Electoral Council of Venezuela, which is the name that it was called in the 1970's. It is currently called the National Electoral Council. This is the highest electoral administrative agency in Venezuela and oversees all elections in Venezuela. In 1979, at the age of 19, I began my career at the Supreme Electoral Council of Venezuela as secretary in the regional delegation of the federal district. When I graduated from the university as a lawyer, my position on the Supreme Electoral Council changes to the position as an adviser to the Judicial Council of the Supreme Council Electoral. In 1991, I was appointed Assistant Director General of Political Parties, where I served until Hugo Chavez came to power in 1998. Also during this time, I served for seven years as a member of the Legislative Commission of the Venezuelan Electoral Council. It was the role of the Legislative Commission to review and identify any issues related to candidates

for elected positions. The Legislative Commission and my office had access to many resources within the various departments of the Electoral Council, including an information technology section that had experts in computers, computer programming, computer systems and telecommunications features such as modems, telephone lines. I was regularly in communication with the various departments of the Electoral Body for my daily duties. In the last years of my work for the Electoral Counsel, a little of my activities and duties were to learn about electronic voting systems and their functioning by Council experts.

6. As Deputy Director General of Political Parties in the Supreme Electoral Council, it was my duty to oversee everything related to political parties in Venezuela, particularly the participation of political parties in elections and the selection and qualifications of candidates for political office. My office reviewed everything to do with the ability of political parties to participate in the electoral process. Before a political party could be formed, it had to undergo a process for approval. This included legal approval of the party name, its colors and a list of its members. The proposed party had to have a certain percentage of Venezuela's population depending on whether it wanted to be a regional or national party. It could not be constituted as a political party until it was approved by the Supreme Electoral Council. My office also oversaw the creation of ballots that bore the name of the candidates and any party symbol or color that the candidate would like to use. When our office approved these matters, we sent the ballot for printing and circulation. Any conflict over which group could be a political party, which would be a candidate for elected office, how that candidate would be included in the vote, were decided by my office. I was a signatory to all decisions taken by the Political Parties office at the Supreme Electoral Council.

7. After Hugo Chavez was elected, he changed the Venezuelan Constitution. One such change was in the Supreme Electoral Council, now the Electoral Power. In February 2009, a national referendum was passed to change Venezuela's Constitution to end mandate limits for elected officials, including the President of Venezuela. This change allowed Hugo Chavez to be re-elected an unlimited number of times.

8. In 2003, I was appointed Director General of Political Parties at the National Electoral Council. At the end of that year there was a national effort to hold a referendum to remove Hugo Chavez from the post of President. In 2004 I was appointed to the Validation Committee that was responsible for reviewing petitions, the requirements of the signatories were their name, their signature, their fingerprint and their identification number. I discovered many ways that the party in power was trying to override requests. One was the change of forms to reflect that the petition was a referendum on the removal of members of the Venezuelan Congress

rather than the removal of the Venezuelan president. The purpose of manipulating petitions was to prevent a referendum to remove President Chavez from office. I investigated the allegations of fraud with the referendum petitions and lobbied for the fraudulent changes to be rectified. Because of my resistance and protests to this voter fraud, I received a letter in March 2004 stating that my position was trusted and trust had been lost in me and I was fired from the service.

9. After my dismissal, I decided to commit to the study of electoral processes both within Venezuela and in other countries, particularly in South American countries that were experiencing electoral unrest and government manipulation of constitutions, laws and elections. I joined a small group of highly educated and informed people who had access to information about the Venezuelan government and its activities. This group and I conduct interviews with Venezuelan citizens, read news publications and specialized treaties, and write evaluating the political, economic, legal and electoral changes taking place in Venezuela, South American countries, and other parts of the world controlled by socialist dictators and oligarchies. I read these treatises, studies, and publications to educate myself on how elections were manipulated and the use of empirical analysis to detect and identify the manipulation of elections and their results. In addition, I have collected copies of official Venezuelan government documents.

10. Official documents of the Venezuelan government include documents showing the bidding process for the implementation of a new electronic voting system in March 2004 and the award of the contract for that new system to Smartmatic. A true and authentic copy of the venezuelan National Electoral Council's tender documents, internal memorandums and contract signed between the Venezuelan government and the SBC Consortium (Smartmatic) are labeled Exhibit 1 and this statement is attached. I received the documents that constitute Exhibit 1 from a reliable person who had taken some notes on the documents and highlighted some parts for my attention. I have not made any alterations to what I have received, and the substantive content of the documents is authentic. For convenience, I've had the Bates document tagged at the bottom right of each page.

11. I have studied the documents contained in Exhibit 1 and have several observations. Exhibit 1 says that it is a contract between the National Electoral Council and the SBC Consortium (Smartmatic) and is dated 15 March 2004. It has a stamp that says Bolivarian Republic of Venezuela, Secretary General of the National Electoral Council. That is the official seal of the Secretary of the National Electoral Council. The initials at the bottom right side confirm the document's authenticity.

12. You would notice that page DIAZ 00002 is important because it shows that the contract is being made on February 16, 2004. Page DIAZ 00027, reflects that on February 14, 2004 at 11:50 a.m., in the Council's session room, Francisco Carrasquero López, Ezequiel Zamora Presilla, Jorge Rodríguez Gómez (Jorge Rodríguez), Sobella Mejías, and William Pacheco Medina, Vice President, the directors of the Secretary General of Electoral Voters respectively, in order to proceed with the delivery to the technical commissions, designated at the meeting dated 13 February 2004, they opened the tender envelopes containing the tenders of the companies that wanted to be awarded a contract for the automation of Venezuela's voting system and the processes used to carry out the 2004 referendum on the revocation of Hugo Chavez's election. Below you can read the amounts of offers made by Smartmatic SBC, Diebold and other bidders.

13. Then, on page DIAZ 000031, there is an internal note from the Director General of Administration, Mr. Medina. It was dated 14 February 2004 and said that a report on the research and evaluation of companies bidding for the automation of the voting system needed to be prepared.

14. It would then draw attention to the page marked DIAZ 000029. It is a document made on February 13, 2004. While this page is out of sequence, it shows the speed at which the decision was made to award the electoral system contract. The tender began on February 13 and had ended on February 16th -- a three-day period to review contracts and evaluate the specifications and performance of bidders' systems, including software, hardware, security, performance and bidding costs for the procurement, installation, training and operation of the systems. By February 16th, a decision to choose Smartmatic was made. This is convincing evidence that there was no genuine competition for the electoral system contract or serious consideration for alternative contracts. There was no due diligence and the bidding was rigged. It is not possible that within three or four days to do the formal investigation to evaluate the bids and award a contract of this size and important. The impropriety of this action is confirmed by the fact that the contract with Smartmatic was signed a month later, on 15 March 2004.


15. After the contract was awarded to Smartmatic, it was learned that Smartmatic had no previous experience in conducting elections and electoral tabulations. More importantly, it was discovered that the Smartmatic voting system contained two-way communication functions that allowed voting data not only to be sent to a central system of operation and voting, but the central voting system in operation and tabulation to send operational instructions and data to voting machines. It is not mentioned in the contract documents and specifications that the system would be bidirectional and would allow the transmission of data and instructions from the central operating system directly to voting machines. One

simply has to examine the system diagram on page DIAZ 000057 of Exhibit 1. If this feature of the Smartmatic system had been disclosed to the Electoral Council, it could not have adequately accepted Smartmatic's offer because it would allow the Smartmatic voting system to be handled in a way that manipulated votes and interfered with the legitimate voting and electoral process by impersonating the will to govern officials with the will of the electorate: the citizens of Venezuela. It was not surprising that Hugo Chávez and his successors then constantly won the election through the use and manipulation of the Smartmatic voting system.

16. In the 16 years since I left my post as Director General of Political Parties at the National Electoral Council of Venezuela, I have studied the electoral systems of Bolivia, Colombia, Ecuador, Guatemala, Honduras and Nicaragua and have observed elections and participated in pro-democratic forums in Colombia, Ecuador, Honduras and Nicaragua. I have also studied and researched electoral processes in Europe, participating in public academic conferences in Spain and Italy on the subject of democratic electoral processes.

17. Based on my specialized experiences with electoral systems, I have a firm view that no legitimate electronic voting system should be allowed to have the ability of two-way communications to send data and instructions between central tabulation operations and voting machines over telephone lines or the Internet. Having such characteristics compromise the integrity of the entire voting process by allowing injection of data and instructions to manipulate voting before, during and after an election and to avoid detection of processes and mechanisms designed to prevent voting manipulation and fraud.

I declare under penalty of perjury that the above is true and correct and that this Statement was prepared in Dallas County, Texas, and executed on November 20, 2020.



Ana Mercedes Díaz Cardozo

Declaration of Seth Keshel

Pursuant to 28 U.S.C Section 1746, I, Seth Keshel, make the following declaration.

1. I am over the age of 21 years and I am under no legal disability, which would prevent me from giving this declaration.
2. I am a trained data analyst with experience in multiple fields, including service in the United States Army as a Captain of Military Intelligence, with a one-year combat tour in Afghanistan. My experience includes political involvement requiring a knowledge of election trends and voting behavior.
3. I reside at 233 Muir Hill Dr., Aledo, TX 76008.
4. My declaration highlights substantial deviance from statistical norms and results regarding voting patterns in Wisconsin.
5. All 2020-related voting totals are taken from the Decision Desk HQ unofficial tracker, are not certified, and are subject to change from the time of the creation of this declaration.
6. Wisconsin has shown a steady decrease for support in Democratic presidential nominees since Barack Obama won the state by 13.91% in 2008. He won Wisconsin again in 2012, but only by a margin of 6.94%, and Republican Donald Trump won the state by 0.77% in 2016.
7. As part of an overall working-class voter shift, Wisconsin has moved in the same manner as Pennsylvania, Ohio, Michigan, and Minnesota – decreasing levels of support for Democratic nominees, and by consequence of this shift, increasing levels of support for Republican

nominees. This shift is captured in visual form in Exhibit A to this declaration.

8. The following counties have cast more Democratic presidential votes than cast for Obama in 2008, when he won the state by 13.91%:

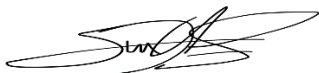
- a. Ozaukee – 26,515 Biden votes, a 31.5% increase from 2016, and 28.8% more than cast for Obama in 2008. President Trump has increased his vote share by 11.3%, receiving 33,912 votes. Democratic vote shifts were -6.9% in 2012 and +5.3% in 2016.
- b. Dane – 260,157 Biden votes, a 19.5% increase from 2016, and 26.3% more than cast for Obama in 2008. President Trump has increased his vote share by 10.5%, receiving 78,789 votes. Democratic vote shifts were +4.9% in 2012 and +0.8% in 2016. Dane County is home to the University of Wisconsin. President Obama had record support, turnout, and enthusiasm among college-age students and did not have to navigate pandemic-related challenges to turn out these voters, which makes Biden's total extremely suspicious.
- c. Waukesha – 103,867 Biden votes, a 31.1% increase from 2016, and 21.7% more than cast for Obama in 2008. President Trump has increased his vote share by 12.0%, receiving 159,633 votes. Democratic vote shifts were -7.7% in 2012 and +0.6% in 2016.
- d. St. Croix - 23,190 Biden votes, a 32.7% increase from 2016, and 9.5% more than cast for Obama in 2008. President Trump has increased his vote share by 22.8%, receiving 32,190 votes. Democratic vote shifts were -6.0% in 2012 and -12.2% in 2016,

making such a sharp Democratic turnabout in the face of a strong President Trump vote increase extremely suspect.

- e. Washington - 26,647 Biden votes, a 27.8% increase from 2016, and 3.6% more than cast for Obama in 2008. President Trump has increased his vote share by 16.4%, receiving 60,235 votes. Democratic vote shifts were -9.9% in 2012 and -10.0% in 2016. A rebound of 27.8% for Democrats from two consecutive cycles of heavy losses, particularly with President Trump reconsolidating the Republican Party base and lost third-party voters, seems unlikely.
 - f. Bayfield - 6,155 Biden votes, a 24.3% increase from 2016, and 3.1% more than cast for Obama in 2008. President Trump has increased his vote share by 12.0%, receiving 4,617 votes. Democratic vote shifts were +1.0% in 2012 and -18.9% in 2016.
9. Milwaukee County's voter rolls shrank from 2016 to 2020, after losing 13.1% of President Obama's Democratic vote total from 2012; however, this year, Milwaukee County has surged in Democratic votes to nearly equal Obama re-election levels with 317,251 votes, even as President Trump has made an increase of 6.6% in votes. With a declining voter roll, Milwaukee County was likely on track to cast less than 275,000 Democratic ballots this year. Combining these resurgent totals with the transparency issues experienced on the early morning hours of November 4, their current total of 317,251 is strikingly suspect.
10. *New York Times* live vote reporting shows a dump of 168,541 votes at 3:42:20 (a.m.) on November 4, 2020. Of those votes, 143,378

(85.07%) went for Biden, and just 25,163 (14.93%) went for Trump. This dump was enough to flip the race with almost no transparency to the viewing public. The live graph showing this vote dump (circled) is attached as Exhibit D to this document.

11. President Trump has vastly increased his vote share in the entirety of Wisconsin, and also in the rural parts of the state, including the counties he flipped from Democratic to Republican in 2016; however, against the trends of the previous election, the Democrats have increased at greater margins than Trump has, thereby erasing margin gain, and allowing for suspicious vote totals in Milwaukee, Dane, Ozaukee, Waukesha, St. Croix, and other counties with strikingly high Democratic vote totals to overwhelm Trump's totals. A county classification of Wisconsin is available in Exhibit B to this declaration, and a full analysis of Wisconsin's voter irregularities is available in Exhibit C.



Seth Keshel

17 Nov. 2020

Aledo, Texas

Improbable Voting Trend Reversals in Wisconsin

Seth Keshel, MBA

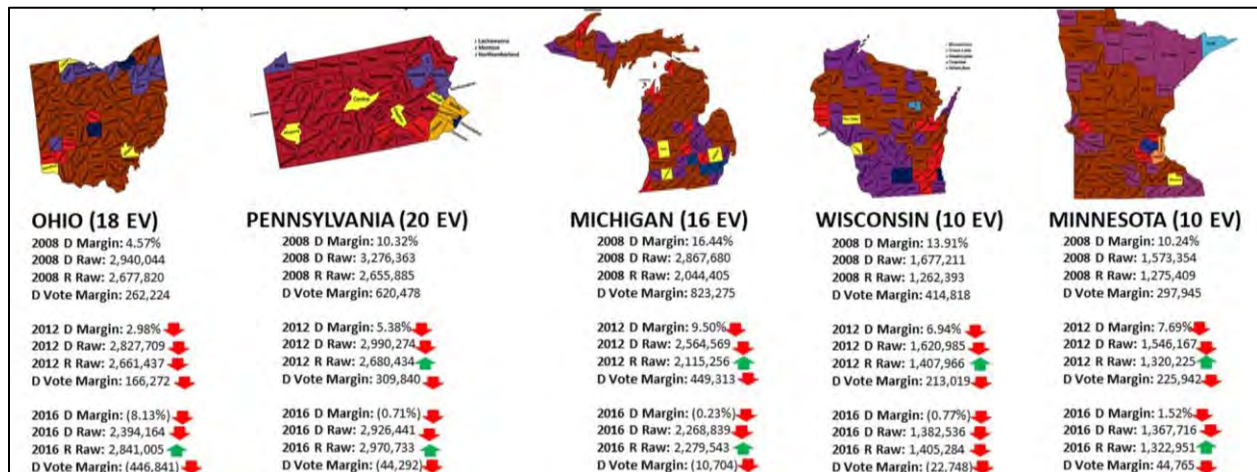
Executive Summary

Wisconsin is showing the same pattern of potential widespread fraud as observed in Pennsylvania, Michigan, Georgia, and North Carolina. While Milwaukee County is focal for transparency and observation violations, including reporting statistically impossible vote counts in the early morning hours away from scrutiny, Dane County has surged far past support totals for President Obama, despite expected difficulties mobilizing student voters to polls. President Trump has reconsolidated the Republican base in suburban Milwaukee and far surpassed his 2016 support levels but has been limited in margin growth by historically improbable Democratic support in these strongholds, which defy years of data in Wisconsin in which the Republican party surged as the Democratic Party plunged. Finally, in strong Trump counties showing a double inversion cycle (one party up, the other down), particularly in rural and exurban Wisconsin, Trump's totals are soaring, and against established trends, Biden's totals are at improbable levels of support despite lacking registration population growth.

The entire vote must be canvassed and audited for both electronic vote fraud and mail/absentee fraud.

Opening

Since President Obama swept through the Midwest ("Rust Belt") region in 2008, winning Pennsylvania by 10 percent, Michigan by 16 percent, and Wisconsin by 14 percent, the Democratic Party has declined steadily in all successive Presidential elections in not only share of the vote, but in raw votes overall, without exception (pending the final results of the 2020 election). Pennsylvania is the only state mentioned in this paragraph which registers voters by party, and it has trended three percentage points in favor of Republicans since the 2016 election. The raw vote trends and results in these three states, plus Ohio and Minnesota, are pictured below.



These trends show the Democrats losing raw votes in every election since 2008, with the Republicans gaining in eight of 10 samples, and with the margins moving in favor of Republicans each time. This is a product of limited or stagnant population growth in these states, which given stable turnout numbers, means one party is typically going down if another is going up. In fast-growing states such as Florida, Texas, or Arizona, it should be expected for both parties to make substantial gains in a "horse race" scenario.

Wisconsin

President Obama's margin of victory in Wisconsin from 2008 fell from 13.91% to 6.94% in his reelection campaign, and that margin moved 7.71% toward Republicans in 2016 as the working-class communities that historically favored Democrats moved to support then-candidate Donald Trump. Declining voting power from these working class counties beginning and 2012, and then from Milwaukee County in 2016 was an instrumental part of this shift, as was the substantial movement of northern Wisconsin toward the Republican Party. President Trump was able to win Wisconsin in 2016 thanks to substantially decreased support for Democrats, and even overcame less than optimal support from the Republican strongholds of southeastern Wisconsin.

The consistent characteristic in the shift in Wisconsin's political landscape is the declining Democratic Party raw vote totals, and the increasing Republican totals. Thus far, according to the Decision Desk unofficial vote tally, President Trump is substantially adding to his vote totals in every Wisconsin County, while his opponent adds votes at a greater percentage, often in counties that have trended steadily away from Democrats since at least 2008. The following counties, which have mostly lost Democratic votes since 2008, have now contributed more Biden votes than Obama received in 2008, when he won the state by 13.91%. Green font represents growth in raw votes. Red font represents decrease in raw votes.

| County | Rep '08 | Dem '08 | Rep '12 | Dem '12 | Rep '16 | Dem '16 | Rep '20 | Dem '20 | Dem Percentage of Obama 2008 Votes |
|------------|---------|---------|---------|---------|---------|---------|---------|---------|------------------------------------|
| Ozaukee | 32,172 | 20,579 | 36,077 | 19,159 | 30,464 | 20,170 | 33,912 | 26,515 | 128.8% |
| % Increase | N/A | N/A | 12.1% | (6.9%) | (15.6%) | 5.3% | 11.3% | 31.5% | |
| ---- | | | | | | | | | |
| Dane | 73,065 | 205,984 | 83,644 | 216,071 | 71,275 | 217,697 | 78,789 | 260,157 | 126.3% |
| % Increase | N/A | N/A | 14.5% | 4.9% | (14.8%) | 0.8% | 10.5% | 19.5% | |
| ---- | | | | | | | | | |
| Waukesha | 145,152 | 85,339 | 162,798 | 78,779 | 142,543 | 79,224 | 159,633 | 103,867 | 121.7% |
| % Increase | N/A | N/A | 12.2% | (7.7%) | (12.4%) | 0.6% | 12.0% | 31.1% | |
| ---- | | | | | | | | | |
| Racine | 45,954 | 53,408 | 49,347 | 53,008 | 46,681 | 42,641 | 54,475 | 50,154 | 117.6% |
| % Increase | N/A | N/A | 7.4% | (0.7%) | (5.4%) | (19.6%) | 16.7% | 17.6% | |
| ---- | | | | | | | | | |
| St. Croix | 22,837 | 21,177 | 25,503 | 19,910 | 26,222 | 17,482 | 32,190 | 23,190 | 109.5% |
| % Increase | N/A | N/A | 11.7% | (6.0%) | 2.8% | (12.2%) | 22.8% | 32.7% | |
| ---- | | | | | | | | | |
| Wash'ton | 47,729 | 25,719 | 54,765 | 23,166 | 51,740 | 20,852 | 60,235 | 26,647 | 103.6% |
| % Increase | N/A | N/A | 14.7% | (9.9%) | (5.5%) | (10.0%) | 16.4% | 27.8% | |
| ---- | | | | | | | | | |
| Bayfield | 3,365 | 5,972 | 3,603 | 6,033 | 4,124 | 4,953 | 4,617 | 6,155 | 103.1% |
| % Increase | N/A | N/A | 7.1% | 1.0% | 14.5% | (18.9%) | 12.0% | 24.3% | |

OTHER NOTABLE COUNTIES

| County | Rep '08 | Dem '08 | Rep '12 | Dem '12 | Rep '16 | Dem '16 | Rep '20 | Dem '20 | Dem Percentage of Obama 2008 Votes |
|------------|---------|---------|---------|---------|---------|---------|---------|---------|------------------------------------|
| Milwaukee | 149,445 | 319,819 | 154,924 | 332,438 | 126,069 | 288,822 | 134,355 | 317,251 | 99.2% |
| % Increase | N/A | N/A | 3.7% | 3.9% | (18.6%) | (13.1%) | 6.6% | 9.8% | |
| ---- | | | | | | | | | |
| La Crosse | 23,701 | 38,524 | 25,751 | 36,693 | 26,378 | 32,406 | 28,661 | 37,817 | 98.5% |
| % Increase | N/A | N/A | 8.6% | (4.8%) | 2.4% | (11.7%) | 8.7% | 16.7% | |
| ---- | | | | | | | | | |
| Brown | 55,854 | 67,269 | 64,836 | 62,526 | 67,210 | 53,382 | 75,865 | 65,509 | 97.4% |
| % Increase | N/A | N/A | 16.1% | (7.1%) | 3.7% | (14.6%) | 12.9% | 22.7% | |
| ---- | | | | | | | | | |
| Eau Claire | 20,959 | 33,146 | 23,256 | 30,666 | 23,331 | 27,340 | 25,339 | 31,617 | 95.6% |
| % Increase | N/A | N/A | 11.0% | (7.5%) | 0.3% | (10.8%) | 8.6% | 15.6% | |
| ---- | | | | | | | | | |

| | | | | | | | | | |
|------------|--------|--------|--------|---------|--------|---------|--------|--------|-------|
| Outagamie | 39,667 | 50,294 | 47,372 | 45,659 | 49,879 | 38,068 | 58,379 | 47,659 | 94.8% |
| % Increase | N/A | N/A | 19.4% | (9.2%) | 5.3% | (16.4%) | 17.0% | 25.2% | |
| ---- | | | | | | | | | |
| Walworth | 25,485 | 24,117 | 29,006 | 22,552 | 28,863 | 18,710 | 33,844 | 22,783 | 94.2% |
| % Increase | N/A | N/A | 13.8% | (6.7%) | (0.5%) | (17.0%) | 17.3% | 21.8% | |
| ---- | | | | | | | | | |
| Rock | 27,364 | 50,529 | 30,517 | 49,219 | 31,493 | 39,339 | 37,133 | 46,649 | 92.3% |
| % Increase | N/A | N/A | 11.5% | (2.6%) | 3.2% | (20.1%) | 17.9% | 18.6% | |
| ---- | | | | | | | | | |
| Kenosha | 31,609 | 45,836 | 34,977 | 44,867 | 36,037 | 35,799 | 44,972 | 42,191 | 92.0% |
| % Increase | N/A | N/A | 10.6% | (2.1%) | 3.0% | (20.2%) | 24.8% | 17.9% | |
| ---- | | | | | | | | | |
| Winnebago | 37,946 | 48,167 | 42,122 | 45,449 | 43,445 | 37,047 | 47,795 | 44,060 | 91.5% |
| % Increase | N/A | N/A | 11.0% | (5.6%) | 3.1% | (18.5%) | 10.0% | 18.9% | |
| ---- | | | | | | | | | |
| Sheboygan | 30,801 | 30,395 | 34,072 | 27,918 | 32,514 | 23,000 | 37,624 | 27,109 | 89.2% |
| % Increase | N/A | N/A | 10.6% | (8.1%) | (4.6%) | (17.6%) | 15.7% | 17.9% | |
| ---- | | | | | | | | | |
| Fond D.L. | 28,164 | 23,463 | 30,355 | 22,379 | 31,022 | 17,387 | 35,754 | 20,588 | 87.7% |
| % Increase | N/A | N/A | 7.8% | (4.6%) | 2.1% | (22.3%) | 15.3% | 18.4% | |
| ---- | | | | | | | | | |
| Marathon | 30,345 | 36,367 | 36,617 | 32,363 | 39,014 | 26,481 | 44,623 | 30,807 | 84.7% |
| % Increase | N/A | N/A | 20.7% | (11.0%) | 6.5% | (18.2%) | 14.4% | 16.3% | |

Findings

The most suspicious counties are those that showed two consecutive elections trending upward for the Republican candidate and downward for the Democratic candidate. These show a similar pattern to counties in Pennsylvania trending heavily Republican in registration, with a significant increase for President Trump in raw votes in 2020, but a smaller than expected margin due to an unexpected sharp reversal of votes for Biden in counties showing inverse trends for parties in recent elections. The only counties not showing two consecutive cycles of decline for Democrats are Waukesha, Bayfield, and Milwaukee. Wisconsin had several Republican counties in 2016 with fewer votes for Trump and higher third-party vote shares (hence 2,682 fewer votes for Trump than Romney), but based on 2020 returns to this point, that has been overcome in every single county.

Dane County is clearly associated with a major university, with student turnout thought to be reaching record lows due to campus shutdowns and lack of mobilization. This county is over 2008 Obama levels by 26.3% (54,173 votes), when that candidate drew record support from young voters, and up 19.5% since 2016, after two consecutive elections of sparse growth in Democrat votes. This county is one of few counties Obama overperformed in for his reelection, and 2020's total is still 20.4% over that number. The same mathematical improbability given the circumstances of 2020 was also seen in Washtenaw County, Michigan (home county of the University of Michigan). Dane County should be audited and recanvassed significantly, particularly for mail and absentee ballot fraud.

Trump slightly underperformed Romney's 2012 vote totals statewide because he lagged in total votes from suburban counties Waukesha, Racine, Washington, Ozaukee, and Walworth. This year, he has reconsolidated the Republican base and improved at a minimum of 11.3% (Ozaukee) in raw votes in these counties, and at a high of 17.3% (Walworth). President Trump has grown his share of raw votes in Wisconsin by a minimum of 4.1% (Menominee) in all counties, and at a high of 24.8% (Kenosha).

Among the largest counties in the state, the largest spikes in growth since 2016 by the Democratic candidate came in St. Croix (32.7%), Ozaukee (31.5%), Waukesha (31.1%), Washington (27.7%), placing them ahead of President Obama's total of votes in those counties in 2008, a year in

which he won the state by 13.91%. This could be feasible if the inverse pattern of “one party up, one party down” were present, suggesting the transfer of voters from one party to the next, but President Trump has also greatly overperformed his 2016 vote totals and does not exhibit the collapse in support seen by Democrats in 2012 and 2016, especially in known Republican strongholds. While it is plausible that Democrats should add votes in those counties based on observed party registration trends in the Philadelphia area, it is unfathomable that those counties would overperform their 2008 Obama vote numbers by such margins, while still adding substantial increases in raw votes to President Trump in 2020.

Despite ranking 67th in the state in percentage increase in voter registrations, Milwaukee County increased its share of Democratic votes by 9.8%, even as President Trump increased by 6.6% while supposedly securing a higher share of minority votes than any Republican since 1960. Biden’s total is nearly equal to Obama’s 2008 performance and reverses a massive loss of Democratic votes in 2016 in a post-Obama environment, despite a decreasing voter roll (more than 3% decrease in registrations since 2016). Strangely, Milwaukee’s turnout dwarfs other regional counterparts like Cleveland, Gary, and Indianapolis. This county is reported to have had many flagrant abuses of transparency regulations and is also known to have reported results without observation in the early morning hours of November 4, 2020, which was just enough to overcome a once formidable lead in the state by President Trump. The best course of action in Milwaukee is to recanvass and audit every mail-in and absentee ballot for massive fraud. The trend in Cleveland, Detroit, Milwaukee, and Philadelphia recently has suggested decreasing vote totals from one election to the next and is supported by the aforementioned significant decrease in the voter rolls in Milwaukee. This year’s reported vote totals necessitate and improbable turnout level and suggest illegality in reporting and mail balloting.

All counties showing two consecutive cycles of inverse party trend (Republican up twice, Democrat down twice), with Democrats substantially up this year, may be subject to counting errors, or “glitches,” like those reported in Antrim County, Michigan, or even recently in Rock County, Wisconsin. These voting machines and their associated software should be audited and examined by coding professionals, especially if the recent newsworthy events regarding corrupted voting software are widespread. It is highly possible that tampered or corrupted software in known Trump strongholds may be responsible for reducing margins of raw vote victory in counties that have massively left the Democratic Party since 2008.

The entire vote in Wisconsin is suspect against recent trends and should be subject to recanvass and audit, not just a recount of hundreds of thousands of illegal ballots. It appears that the major case in the state is that in spite of substantially growing his vote share in strong-Trump counties, and surging in votes in urban and suburban counties, Trump’s margin is substantially limited, even after two consecutive inverse party trends. In urban or suburban areas, Democratic vote share is soaring to record numbers, even over Obama’s totals after a 13.91% win, all while Trump surges in votes in those counties as well. Urban areas have issues with transparency and should be fully audited for mail and absentee fraud.

Ballot-Marking Devices (BMDs) Cannot Assure the Will of the Voters

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December 27, 2019

Abstract

The complexity of U.S. elections usually requires computers to count ballots—but computers can be hacked, so election integrity requires a voting system in which paper ballots can be recounted by hand. However, paper ballots provide no assurance unless they accurately record the vote as the voter expresses it.

Voters can express their intent by indelibly hand-marking ballots, or using computers called ballot-marking device (BMDs). Voters can make mistakes in expressing their intent in either technology, but only BMDs are also subject to hacking, bugs, and misconfiguration of the software that prints the marked ballots. Most voters do not review BMD-printed ballots, and those who do often fail to notice when the printed vote is not what they expressed on the touchscreen. Furthermore, there is no action a voter can take to demonstrate to election officials that a BMD altered their expressed votes, nor is there a corrective action that election officials can take if notified by voters—there is no way to deter, contain, or correct computer hacking in BMDs. These are the essential security flaws of BMDs.

Risk-limiting audits can assure that the votes recorded on paper ballots are tabulated correctly, but no audit can assure that the votes on paper are the ones expressed by the voter on a touchscreen: Elections conducted on current BMDs cannot be confirmed by audits. We identify two properties of voting systems, *contestability* and *defensibility*, necessary for audits to confirm election outcomes. No available EAC-certified BMD is contestable or defensible.

[†]Authors are listed alphabetically; they contributed equally to this work.

1 Introduction: Criteria for Voting Systems

Elections for public office and on public questions in the United States or any democracy must produce outcomes based on the votes that voters *express* when they indicate their choices on a paper ballot or on a machine. Computers have become indispensable to conducting elections, but computers are vulnerable. They can be hacked—compromised by insiders or external adversaries who can replace their software with fraudulent software that deliberately miscounts votes—and they can contain design errors and bugs—hardware or software flaws or configuration errors that result in misrecording or mis-tabulating votes. Hence there must be some way, *independent* of any software in any computers, to ensure that reported election outcomes are correct, i.e., consistent with the expressed votes as intended by the voters.

Voting systems should be *software independent*, meaning that “an undetected change or error in its software cannot cause an undetectable change or error in an election outcome” [29, 30, 31]. Software independence is similar to tamper-evident packaging: if somebody opens the container and disturbs the contents, it will leave a trace.

The use of software-independent voting systems is supposed to ensure that if someone fraudulently hacks the voting machines to steal votes, we’ll know about it. But we also want to know *the true outcome* in order to avoid a do-over election.¹ A voting system is *strongly software independent* if it is software independent and, moreover, a detected change or error in an election outcome (due to change or error in the software) can be corrected using only the ballots and ballot records of the current election [29, 30]. Strong software independence combines tamper evidence with a kind of resilience: there’s a way to tell whether faulty software caused a problem, and a way to recover from the problem if it did.

Software independence and *strong software independence* are now standard terms in the analysis of voting systems, and it is widely accepted that voting systems should be software independent. Indeed, version 2.0 of the Voluntary Voting System Guidelines (VVSG 2.0) incorporates this principle [10].

But as we will show, these standard definitions are incomplete and inadequate, because in the word *undetectable* they hide several important questions: *Who* detects the change or error in an election outcome? How can a person *prove* that she has detected

¹Do-overs are expensive; they may delay the inauguration of an elected official; there is no assurance that the same voters will vote in the do-over election as voted in the original; they decrease public trust. And if the do-over election is conducted with the same voting system that can only detect but not correct errors, then there may need to be a do-over of the do-over, *ad infinitum*.

an error? *What happens* when someone detects an error—does the election outcome remain erroneous? Or conversely: How can an election administrator *prove* that the election outcome not been altered, or prove that the correct outcome was recovered if a software malfunction was detected? The standard definition does not distinguish evidence available to an election official, to the public, or just to a single voter; nor does it consider the possibility of false alarms.

Those questions are not merely academic, as we show with an analysis of ballot-marking devices. Even if some *voters* “detect” that the printed output is not what they expressed to the BMD—even if some of *those* voters report their detection to election officials—there is no mechanism by which the *election official* can “detect” whether a BMD has been hacked to alter election outcomes. The questions of *who detects*, and *then what happens*, are critical—but unanswered by the standard definitions.

We will define the terms *contestable* and *defensible* to better characterize properties of voting systems that make them acceptable for use in public elections.²

A voting system is *contestable* if an undetected change or error in its software that causes a change or error in an election outcome can always produce *public* evidence that the outcome is untrustworthy. For instance, if a voter selected candidate A on the touchscreen of a BMD, but the BMD prints candidate B on the paper ballot, then this A-vs-B evidence is available to the individual voter, but the voter cannot demonstrate this evidence to anyone else, since nobody else saw—nor should have seen—where the voter touched the screen.³ Thus, the voting system does not provide a way for the voter who observed the misbehavior to prove to anyone else that there was a problem, even if the problems altered the reported outcome. Such a system is therefore not *contestable*.

While the definition of software independence might allow evidence available only to individual voters as “detection,” such evidence does not suffice for a system to be contestable. Contestability is software independence, plus the requirement that “detect” implies “can generate public evidence.” “Trust me” does not count as public evidence. If a voting system is not contestable, then problems voters “detect” might never see the light of day, much less be addressed or corrected.⁴

²There are other notions connected to contestability and defensibility, although essentially different: Benaloh et al. [6] define a *P-resilient canvass framework*, *personally verifiable P-resilient canvass framework*, and *privacy-perserving personally verifiable P-resilient canvass frameworks*.

³See footnote 18.

⁴If voters are the only means of detecting and quantifying the effect of those problems—as they are for BMDs—then in practice the system is not strongly software independent. The reason is that, as we will show, such claims by (some) voters *cannot* correct software-dependent changes to other voters’ ballots, and *cannot* be used as the basis to invalidate or correct an election outcome. Thus, BMD-based

Similarly, while strong software independence demands that a system be able to report the correct outcome even if there was an error or alteration of the software, it does not require *public evidence* that the (reconstructed) reported outcome is correct. We believe, therefore, that voting systems must also be *defensible*. We say that a voting system is defensible if, when the reported electoral outcome is correct, it is possible to generate convincing public evidence that the reported electoral outcome is correct—despite any malfunctions, software errors, or software alterations that might have occurred. If a voting system is not defensible, then it is vulnerable to “crying wolf”: malicious actors could claim that the system malfunctioned when in fact it did not, and election officials will have no way to prove otherwise.

By analogy with *strong software independence*, we define: A voting system is *strongly defensible* if it is defensible and, moreover, a detected change or error in an election outcome (due to change or error in the software) can be corrected (with convincing public evidence) using only the ballots and ballot records of the current election.

In short, a system is contestable if it can generate public evidence of a problem whenever a reported outcome is wrong, while a system is defensible if it can generate public evidence whenever a reported outcome is correct—despite any problems that might have occurred. Contestable systems are publicly tamper-evident; defensible systems are publicly, demonstrably resilient.

Defensibility is a key requirement for *evidence-based elections* [38]: defensibility makes it possible in principle for election officials to generate convincing evidence that the reported winners really won—if the reported winners did really win. (We say an election *system* may be defensible, and an *election* may be evidence-based; there’s much more *process* to an election than just the choice of system.)

Examples. The only known practical technology for contestable, strongly defensible voting is a system of *hand-marked paper ballots*, kept demonstrably physically secure, counted by machine, audited manually, and recountable by hand.⁵ In a hand-marked paper ballot election, ballot-marking software cannot be the source of an error or change-of-election-outcome, because no software is used in marking ballots. Ballot-scanning-and-counting software can be the source of errors, but such errors can be

election systems are not even (weakly) software independent, unless one takes “detection” to mean “somebody claimed there was a problem, with no evidence to support that claim.”

⁵The election must also generate convincing evidence that physical security of the ballots was not compromised, and the audit must generate convincing public evidence that the audit itself was conducted correctly.

detected and corrected by audits.

That system is *contestable*: if an optical scan voting machine reports the wrong outcome because it miscounted (because it was hacked, misprogrammed, or miscalibrated), the evidence is *public*: the paper ballots, recounted before witnesses, will not match the claimed results, also witnessed. It is *strongly defensible*: a recount before witnesses can demonstrate that the reported outcome is correct, or can find the correct outcome if it was wrong—and provide public evidence that the (reconstructed) outcome is correct.

Some other paper-based systems such as Prêt-à-Voter [32] and Scantegrity [9] are also contestable and strongly defensible (provided the marked ballots are kept demonstrably secure through tabulation and posting). Scantegrity inherits these properties from the fact that it amounts to a cryptographic enhancement of hand-marked paper ballots. Prêt-à-Voter has these properties if the blank ballots are audited appropriately before the election.

Paper-based systems that rely on the “Benaloh challenge”—to ensure that the encryption of the vote printed on the ballot (by an electronic device) is correct—generally are neither contestable nor defensible.⁶ The reason is that, while the challenge can produce public evidence that a machine did not accurately encrypt the plaintext vote on the ballot, if the machine prints the wrong plaintext vote and a correct encryption of that incorrect vote, there is no evidence the voter can use to prove that to anyone else. STAR-Vote [5] is an example of such a system.

Over 40 states now use some form of paper ballot for most voters [18]. Most of the remaining states are taking steps to adopt paper ballots. But *not all voting systems that use paper ballots are equally secure*.

Some are not even software independent. Some are software independent, but not strongly software independent, contestable, or defensible. In this report we explain:

- *Hand-marked paper ballot* systems are the only practical technology for contestable, strongly defensible voting systems.
- *Some ballot-marking devices (BMDs)* can be software independent, but they not strongly software independent, contestable, or defensible. Hacked or misprogrammed BMDs can alter election outcomes undetectably, so elections conducted using BMDs cannot provide public evidence that reported outcomes are correct. If BMD malfunctions are detected, there is no way to determine who

⁶Nor are they strongly software independent.

really won. Therefore BMDs should not be used by voters who are able to mark an optical-scan ballot with a pen.

- *All-in-one BMD or DRE+VVPAT voting machines* are not software independent, contestable, or defensible. They should not be used in public elections.

2 Background

We briefly review the kinds of election equipment in use, their vulnerability to computer hacking (or programming error), and in what circumstances risk-limiting audits can mitigate that vulnerability.

Voting equipment

Although a voter may form an intention to vote for a candidate or issue days, minutes, or seconds before actually casting a ballot, that intention is a psychological state that cannot be directly observed by anyone else. Others can have access to that intention through what the voter (privately) *expresses* to the voting technology by interacting with it, e.g., by making selections on a BMD or marking a ballot by hand.⁷ Voting systems must accurately record the vote as the voter *expressed* it.

With a *hand-marked paper ballot optical-scan* system, the voter is given a paper ballot on which all choices (candidates) in each contest are listed; next to each candidate is a *target* (typically an oval or other shape) which the voter marks with a pen to indicate a vote. Ballots may be either preprinted or printed (unvoted) at the polling place using *ballot on demand* printers. In either case, the voter creates a tamper-evident record of intent by marking the printed paper ballot with a pen.

Such hand-marked paper ballots may be scanned and tabulated at the polling place using a *precinct-count optical scanner* (PCOS), or may be brought to a central place to

⁷We recognize that voters make mistakes in expressing their intentions. For example, they may misunderstand the layout of a ballot or express an unintended choice through a perceptual error, inattention, or lapse of memory. The use of touchscreen technology does not necessarily correct for such user errors, as every smartphone user who has mistyped an important text message knows. Poorly designed ballots, poorly designed touchscreen interfaces, and poorly designed assistive interfaces increase the rate of error in voters' expressions of their votes. For the purposes of this report, we assume that properly engineered systems seek to minimize such usability errors.

be scanned and tabulated by a *central-count optical scanner* (CCOS). Mail-in ballots are typically counted by CCOS machines.

After scanning a ballot, a PCOS machine deposits the ballot in a secure, sealed ballot box for later use in recounts or audits; this is *ballot retention*. Ballots counted by CCOS are also retained for recounts or audits.⁸

Paper ballots can also be hand counted, but in most jurisdictions (especially where there are many contests on the ballot) this is hard to do quickly; Americans expect election-night reporting of unofficial totals. Hand counting—i.e., manually determining votes directly from the paper ballots—is appropriate for audits and recounts.

A *ballot-marking device* (BMD) provides a computerized user interface that presents the ballot to voters and captures their expressed selections—for instance, a touchscreen interface or an assistive interface that enables voters with disabilities to vote independently. Voter inputs (expressed votes) are recorded electronically. When a voter indicates that the ballot is complete and ready to be cast, the BMD prints a paper version of the electronically marked ballot. We use the term *BMD* for devices that mark ballots but do not tabulate or retain them, and *all-in-one* for devices that combine ballot marking, tabulation, and retention into the same paper path.

The paper ballot printed by a BMD may be in the same format as an optical-scan form (e.g., with ovals filled as if by hand) or it may list just the names of the candidate(s) selected in each contest. The BMD may also encode these selections into barcodes or QR codes for optical scanning. We discuss issues with barcodes later in this report.

An *all-in-one touchscreen voting machine* combines computerized ballot marking, tabulation, and retention in the same paper path. All-in-one machines come in several configurations:

- **DRE+VVPAT machines**—direct-recording electronic (DRE) voting machines with a voter-verifiable paper audit trail (VVPAT)—provide the voter a touchscreen (or other) interface, then print a paper ballot that is displayed to the voter under glass. The voter is expected to review this ballot and approve it, after which the machine deposits it into a ballot box. DRE+VVPAT machines do not contain optical scanners; that is, they do not read what is marked on the paper ballot; instead, they tabulate the vote directly from inputs to the touchscreen or other interface.

⁸Regulations and procedures governing custody and physical security of ballots are uneven and in many cases inadequate, but straightforward to correct because of decades of development of best practices.

- BMD+Scanner all-in-one machines⁹ provide the voter a touchscreen (or other) interface to input ballot choices and print a paper ballot that is ejected from a slot for the voter to inspect. The voter then reinserts the ballot into the slot, after which the all-in-one BMD+scanner scans it and deposits it into a ballot box. Or, some BMD+Scanner all-in-one machines display the paper ballot behind plexi-glass for the voter to inspect, before mechanically depositing it into a ballot box.

Opscan+BMD with separate paper paths. At least one model of voting machine (the Dominion ICP320) contains an optical scanner (opscan) and a BMD in the same cabinet,¹⁰ so that the optical scanner and BMD-printer are not in the same paper path; no possible configuration of the software could cause a BMD-marked ballot to be deposited in the ballot box without human handling of the ballot. We do not classify this as an *all-in-one* machine.

Hacking

There are many forms of computer hacking. In this analysis of voting machines we focus on the alteration of voting machine software so that it miscounts votes or mis-marks ballots to alter election outcomes. There are many ways to alter the software of a voting machine: a person with physical access to the computer can open it and directly access the memory; one can plug in a special USB thumbdrive that exploits bugs and vulnerabilities in the computer's USB drivers; one can connect to its WiFi port or Bluetooth port or telephone modem (if any) and exploit bugs in those drivers, or in the operating system.

"Air-gapping" a system (i.e., never connecting it to the Internet nor to any other network) does not automatically protect it. Before each election, election administrators must transfer a *ballot definition* into the voting machine by inserting a *ballot definition cartridge* that was programmed on election-administration computers that may have been connected previously to various networks; it has been demonstrated that vote-changing viruses can propagate via these ballot-definition cartridges [17].

Hackers might be corrupt insiders with access to a voting-machine warehouse; corrupt insiders with access to a county's election-administration computers; outsiders who can gain remote access to election-administration computers; outsiders who can

⁹Some voting machines, such as the ES&S ExpressVote, can be configured as either a BMD or a BMD+Scanner all-in-one. Others, such as the ExpressVoteXL, work only as all-in-one machines.

¹⁰More precisely, the ICP320 optical scanner and the BMD audio+buttons interface are in the same cabinet, but the printer is a separate box.

gain remote access to voting-machine manufacturers' computers (and "hack" the firmware installed in new machines, or the firmware updates supplied for existing machines), and so on. Supply-chain hacks are also possible: the hardware installed by a voting system vendor may have malware pre-installed by the vendor's component suppliers.¹¹

Computer systems (including voting machines) have so many layers of software that it is impossible to make them perfectly secure [23, pp. 89–91]. When manufacturers of voting machines use the best known security practices, adversaries may find it more difficult to hack a BMD or optical scanner—but not impossible. Every computer in every critical system is vulnerable to compromise through hacking, insider attacks or exploiting design flaws.

Election assurance through risk-limiting audits

To ensure that the reported electoral outcome of each contest corresponds to what the voters expressed, the most practical known technology is a *risk-limiting audit* (RLA) of trustworthy paper ballots [34, 35, 22]. The National Academies of Science, Engineering, and Medicine, recommend routine RLAs after every election [23], as do many other organizations and entities concerned with election integrity.¹²

The *risk limit* of a risk-limiting audit is the maximum chance that the audit will not correct the reported electoral outcome, if the reported outcome is wrong. "Electoral outcome" means the political result—who or what won—not the exact tally. "Wrong" means that the outcome does not correspond to what the voters expressed.

A RLA involves manually inspecting randomly selected paper ballots following a rigorous protocol. The audit stops if and when the sample provides convincing evidence that the reported outcome is correct; otherwise, the audit continues until every ballot has been inspected manually, which reveals the correct electoral outcome if the paper trail is trustworthy. RLAs protect against vote-tabulation errors, whether those errors are caused by failures to follow procedures, misconfiguration, miscalibration, faulty

¹¹Given that many chips and other components are manufactured in China and elsewhere, this is a serious concern. Carsten Schürmann has found Chinese pop songs on the internal memory of voting machines (C. Schürmann, personal communication, 2018). Presumably those files were left there accidentally—but this shows that malicious code *could* have been pre-installed deliberately, and that neither the vendor's nor the election official's security and quality control measures discovered and removed the extraneous files.

¹²Among them are the Presidential Commission on Election Administration, the American Statistical Association, the League of Women Voters, and Verified Voting Foundation.

engineering, bugs, or malicious hacking.¹³

The risk limit should be determined as a matter of policy or law. For instance, a 5% risk limit means that, if a reported outcome is wrong solely because of tabulation errors, there is at least a 95% chance that the audit procedure will correct it. Smaller risk limits give higher confidence in election outcomes, but require inspecting more ballots, other things being equal. RLAs never revise a correct outcome.

RLAs can be very efficient, depending in part on how the voting system is designed and how jurisdictions organize their ballots. If the computer results are accurate, an efficient RLA with a risk limit of 5% requires examining just a few—about 7 divided by the margin—ballots selected randomly from the contest.¹⁴ For instance, if the margin of victory is 10% and the results are correct, the RLA would need to examine about $7/10\% = 70$ ballots to confirm the outcome at 5% risk. For a 1% margin, the RLA would need to examine about $7/1\% = 700$ ballots. The sample size does not depend much on the total number of ballots cast in the contest, only on the margin of the winning candidate's victory.

RLAs assume that a full hand tally of the paper trail would reveal the correct electoral outcomes: the paper trail must be trustworthy. Other kinds of audits, such as *compliance audits* [6, 22, 38, 36] are required to establish whether the paper trail itself is trustworthy. Applying an RLA procedure to an untrustworthy paper trail cannot limit the risk that a wrong reported outcome goes uncorrected.

Properly preserved hand-marked paper ballots ensure that expressed votes are identical to recorded votes. But BMDs might not record expressed votes accurately, for instance, if BMD software has bugs, was misconfigured, or was hacked: BMD print-out is not a trustworthy record of the expressed votes. Neither a compliance audit nor a RLA can possibly check whether errors in recording expressed votes altered election outcomes. RLAs that rely on BMD output therefore cannot limit the risk that an incorrect reported election outcome will go uncorrected.

A paper-based voting system (such as one that uses optical scanners) is systematically more secure than a paperless system (such as DREs) *only if the paper trail is trustworthy and the results are checked against the paper trail using a rigorous method such as an RLA or full manual tally*. If it is possible that error, hacking, bugs, or mis-

¹³RLAs do not protect against problems that cause BMDs to print something other than what was shown to the voter on the screen, nor do they protect against problems with ballot custody.

¹⁴Technically, it is the *diluted margin* that enters the calculation. The diluted margin is the number of votes that separate the winner with the fewest votes from the loser with the most votes, divided by the number of ballots cast, including undervotes and invalid votes.

calibration caused the recorded-on-paper votes to differ from the expressed votes, an RLA or even a full hand recount cannot not provide convincing public evidence that election outcomes are correct: such a system cannot be *defensible*. In short, paper ballots provide little assurance against hacking if they are never examined or if the paper might not accurately reflect the votes expressed by the voters.

3 (Non)Contestability/Defensibility of BMDs

A BMD-generated paper trail is not a reliable record of the vote expressed by the voter. Like any computer, a BMD (or a DRE+VVPAT) is vulnerable to bugs, misconfiguration, hacking, installation of unauthorized (fraudulent) software, and alteration of installed software.

If a hacker sought to steal an election by altering BMD software, what would the hacker program the BMD to do? In cybersecurity practice, we call this the *threat model*.

The simplest threat model is this one: In some contests, not necessarily top-of-the-ticket, change a small percentage of the votes (such as 5%).

In recent national elections, analysts have considered a candidate who received 60% of the vote to have won by a landslide. Many contests are decided by less than a 10% margin. Changing 5% of the votes can change the margin by 10%, because “flipping” a vote for one candidate into a vote for a different candidate changes the difference in their tallies—i.e., the margin—by 2 votes. If hacking or bugs or misconfiguration could change 5% of the votes, that would be a very significant threat.

Although public and media interest often focus on top-of-the-ticket races such as President and Governor, elections for lower offices such as state representatives, who control legislative agendas and redistricting, and county officials, who manage elections and assess taxes, are just as important in our democracy. Altering the outcome of smaller contests requires altering fewer votes, so fewer voters are in a position to notice that their ballots were misprinted. And most voters are not as familiar with the names of the candidates for those offices, so they might be unlikely to notice if their ballots were misprinted, even if they checked.

Research in a real polling place in Tennessee during the 2018 election, found that half the voters *didn't look at all* at the paper ballot printed by a BMD, even when they were holding it in their hand and directed to do so while carrying it from the BMD to the optical scanner [13]. Those voters who did look at the BMD-printed ballot

spent *an average of 4 seconds* examining it to verify that the eighteen or more choices they made were correctly recorded. That amounts to 222 milliseconds per contest, barely enough time for the human eye to move and refocus under perfect conditions and not nearly enough time for perception, comprehension, and recall [27]. A study by other researchers [7], in a simulated polling place using real BMDs deliberately hacked to alter one vote on each paper ballot, found that only 6.6% of voters told a pollworker something was wrong.¹⁵¹⁶ The same study found that among voters who examined their hand-marked ballots, half were unable to recall key features of ballots cast moments before, a prerequisite step for being able to recall their own ballot choices. This finding is broadly consistent with studies of effects like “change blindness” or “choice blindness,” in which human subjects fail to notice changes made to choices made only seconds before [19].

Suppose, then, that 10% of voters examine their paper ballots carefully enough to even *see* the candidate’s name recorded as their vote for legislator or county commissioner. Of those, perhaps only half will remember the name of the candidate they intended to vote for.¹⁷

Of those who notice that the vote printed is not the candidate they intended to vote for, what will they think, and what will they do? Will they think, “Oh, I must have made a mistake on the touchscreen,” or will they think, “Hey, the machine is cheating or malfunctioning!” There’s no way for the voter to know for sure—voters do make mistakes—and there’s *absolutely* no way for the voter to prove to a pollworker or election official that a BMD printed something other than what the voter entered on the

¹⁵You might think, “the voter really *should* carefully review their BMD-printed ballot.” But because the scientific evidence shows that voters *do not* [13] and cognitively *cannot* [16] perform this task well, legislators and election administrators should provide a voting system that counts the votes *as voters express them*.

¹⁶Studies of voter confidence about their ability to verify their ballots are not relevant: in typical situations, subjective confidence and objective accuracy are at best weakly correlated. The relationship between confidence and accuracy has been studied in contexts ranging from eyewitness accuracy [8, 12, 40] to confidence in psychological clinical assessments [14] and social predictions [15]. The disconnect is particularly severe at high confidence. Indeed, this is known as “the overconfidence effect.” For a lay discussion, see *Thinking, Fast and Slow* by Nobel economist Daniel Kahnemann [20].

¹⁷We ask the reader, “do you know the name of the most recent losing candidate for county commissioner?” We recognize that some readers of this document *are* county commissioners, so we ask those readers to imagine the frame of mind of their constituents.

screen.¹⁸¹⁹

Either way, polling-place procedures generally advise voters to ask a pollworker for a new ballot if theirs does not show what they intended. Pollworkers should void that BMD-printed ballot, and the voter should get another chance to mark a ballot. Anecdotal evidence suggests that many voters are too timid to ask, or don't know that they have the right to ask, or are not sure whom to ask. Even if a voter asks for a new ballot, training for pollworkers is uneven, and we are aware of no formal procedure for resolving disputes if a request for a new ballot is refused. Moreover, there is no sensible protocol for ensuring that BMDs that misbehave are investigated—nor can there be, as we argue below.

Let's summarize. If a machine alters votes on 5% of the ballots (enabling it to change the margin by 10%), and 10% of voters check their ballots carefully and 50% of the voters who check notice the error, then optimistically we might expect $5\% \times 10\% \times 50\%$ or 0.25% of the voters to request a new ballot and correct their vote.²⁰ This means that the machine will change the margin by 9.75% and get away with it.

In this scenario, 0.25% of the voters, one in every 400 voters, has requested a new ballot. You might think, "that's a form of *detection* of the hacking." But it isn't, as a practical matter: a few individual voters may have detected that there was a problem, but there's no procedure by which this translates into any action that election administrators can take to correct the outcome of the election. Polling-place procedures *cannot correct or deter hacking, or even reliably detect it*, as we discuss next. This is essentially the distinction between a system that is merely software independent and one that is contestable: a change to the software that alters the outcome might generate evidence for an alert, conscientious, individual voter, but it does not generate public evidence that an election official can rely on to conclude there is a problem.

Even if some voters notice that BMDs are altering votes, there's no way to correct the election outcome. That is, BMD voting systems are *not contestable, not defen-*

¹⁸You might think, "the voter can prove it by showing someone that the vote on the paper doesn't match the vote onscreen." But that won't work. On a typical BMD, by the time a paper record is printed and ejected for the voter to hold and examine, the touchscreen no longer shows the voter's choice. You might think, "BMDs should be designed so that the choices still show on the screen for the voter to compare with the paper." But a hacked BMD could easily alter the on-screen choices to match the paper, *after* the voter hits the "print" button.

¹⁹Voters should *certainly not* videorecord themselves voting! That would defeat the privacy of the secret ballot and is illegal in most jurisdictions.

²⁰This calculation assumes that the 10% of voters who check are in effect a random sample of voters: voters' propensity to check BMD printout is not associated with their political preferences.

sible (and therefore *not strongly defensible*), and *not strongly software independent*. Suppose a state election official wanted to detect whether the BMDs are cheating, and correct election results, based on actions by those few alert voters who notice the error. What procedures could possibly work against the manipulation we are considering?

1. How about, "If at least 1 in 400 voters claims that the machine misrepresented their vote, void the entire election."²¹ No responsible authority would implement such a procedure. A few dishonest voters could collaborate to invalidate entire elections simply by falsely claiming that BMDs changed their votes.
2. How about, "If at least 1 in 400 voters claims that the machine misrepresented their vote, then investigate." Investigations are fine, but then what? The only way an investigation can ensure that the outcome accurately reflects what voters expressed to the BMDs is to void an election in which the BMDs have altered votes and conduct a new election. But how do you know whether the BMDs have altered votes, except based the claims of the voters?²² Furthermore, the investigation itself would suffer from the same problem as above: how can one distinguish between voters who detected BMD hacking or bugs from voters who just want to interfere with an election?

This is the essential security flaw of BMDs: few voters will notice and promptly report discrepancies between what they saw on the screen and what is on the BMD printout, and even when they do notice, there's nothing appropriate that can be done. Even if election officials are convinced that BMDs malfunctioned, *there is no way to determine who really won*.

Therefore, BMDs should not be used by most voters.

Why can't we rely on pre-election and post-election logic and accuracy testing, or parallel testing? Most, if not all, jurisdictions perform some kind of *logic and accuracy testing* (LAT) of voting equipment before elections. LAT generally involves voting on the equipment using various combinations of selections, then checking whether the

²¹Note that in many jurisdictions, far fewer than 400 voters use a given machine on election day: BMDs are typically expected to serve fewer than 300 voters per day. (The vendor ES&S recommended 27,000 BMDs to serve Georgia's 7 million voters, amounting to 260 voters per BMD [33].) Recall also that the rate 1 in 400 is tied to the amount of manipulation. What if the malware flipped only one vote in 50, instead of 1 vote in 20? That could still change the margin by 4%, but—in this hypothetical—would be noticed by only one voter in 1,000, rather than one in 400. The smaller the margin, the less manipulation it would have taken to alter the electoral outcome.

²²Forensic examination of the BMD might show that it *was* hacked or misconfigured, but it cannot prove that the BMD *was not* hacked or misconfigured.

equipment tabulated the votes correctly. As the Volkswagen/Audi “Dieselgate” scandal shows, devices can be programmed to behave properly when they are tested but misbehave in use [11]. Therefore, LAT can never prove that voting machines performed properly in practice.

Parallel or “live” testing involves pollworkers or election officials using some BMDs at random times on election day to mark (but not cast) ballots with test patterns, then check whether the marks match the patterns. The idea is that the testing is not subject to the “Dieselgate” problem, because the machines cannot “know” they are being tested on election day.²³ As a practical matter, the number of tests required to provide a reasonable chance of detecting outcome-changing errors is prohibitive: it would leave no time for actual voting [37]. Moreover, it would require additional staff, infrastructure, and other resources.

Suppose, counterfactually, that it was practical to perform enough parallel testing to guarantee a large chance of detecting a problem if BMD hacking or malfunction altered electoral outcomes. Suppose, counterfactually, that election officials were required to conduct that amount of parallel testing during every election, and that the required equipment, staffing, infrastructure, and other resources were provided. Even then, the system would not be *strongly defensible*; that is, if testing detected a problem, there would be no way to determine who really won. The only remedy would be a new election.

Don’t voters need to check hand-marked ballots, too? It is always a good idea to check one’s work, but there is a substantial body of research (e.g., [28]) suggesting that preventing error as a ballot is being marked is a fundamentally different cognitive task than detecting an error on a previously marked ballot. In cognitively similar tasks, such as proof reading for non-spelling errors, ten percent rates of error detection are common [28, pp 167ff], whereas by carefully attending to the task of correctly marking their ballots, voters apparently can largely avoid marking errors.

A fundamental difference between hand-marked paper ballots and ballot-marking devices is that, with hand-marked paper ballots, voters are responsible for catching and

²³BMDs do “know” their own settings and other aspects of each voting session, so malware can use that information to target sessions that use the audio interface, increase the font size, use the sip-and-puff interface, set the language to something other than English, or take much longer than average to vote. (Voters who use those settings might be less likely to be believed if they report that the equipment altered their votes.) For parallel testing to have a good chance of detecting all outcome-changing problems, the tests must have a large chance of probing *every* combination of settings and voting patterns that includes enough ballots to change any contest result. It is not practical.

correcting *their own errors*, while if BMDs are used, voters are also responsible for catching *machine errors, bugs, and hacking*. Voters are the *only* people who can detect such problems with BMDs—but, as explained above, if voters do find problems, there's no way they can prove to poll workers or election officials that there were problems and no way to ensure that election officials take appropriate remedial action.

4 Other tradeoffs, BMDs versus hand-marked opscan

Supporters of ballot-marking devices advance several other arguments for their use.

- **Mark legibility.** A common argument is that a properly functioning BMD will generate clean, error-free, unambiguous marks, while hand-marked paper ballots may contain mistakes and stray marks that make it impossible to discern a voter's intent. However appealing this argument seems at first blush, the data are not nearly so compelling. Experience with statewide recounts in Minnesota and elsewhere suggest that truly ambiguous handmade marks are very rare.²⁴ For instance, 2.9 million hand-marked ballots were cast in the 2008 Minnesota race between Al Franken and Norm Coleman for the U.S. Senate. In a manual recount, between 99.95% and 99.99% of ballots were unambiguously marked.²⁵ ²⁶ In addition, usability studies of hand-marked bubble ballots—the kind in most common use in U.S. elections—indicate a *voter* error rate of 0.6%, much lower than the 2.5–3.7% error rate for machine-marked ballots [16].²⁷ Moreover, modern image-based opscan equipment (*digital scan* machinery) is better than older

²⁴States do need clear and complete regulations for interpreting voter marks.

²⁵“During the recount, the Coleman and Franken campaigns initially challenged a total of 6,655 ballot-interpretation decisions made by the human recounters. The State Canvassing Board asked the campaigns to voluntarily withdraw all but their most serious challenges, and in the end approximately 1,325 challenges remained. That is, approximately 5 ballots in 10,000 were ambiguous enough that one side or the other felt like arguing about it. The State Canvassing Board, in the end, classified all but 248 of these ballots as votes for one candidate or another. That is, approximately 1 ballot in 10,000 was ambiguous enough that the bipartisan recount board could not determine an intent to vote.” [1] See also [25]

²⁶We have found that some local election officials consider marks to be ambiguous if *machines* cannot read the marks. That is a different issue from *humans* being unable to interpret the marks. Errors in machine interpretation of voter intent can be dealt with by manual audits: if the reported outcome is wrong because machines misinterpreted handmade marks, a RLA has a known, large chance of correcting the outcome.

²⁷Better designed user interfaces (UI) might reduce the error rate for machine-marked ballots below the historical rate for DREs; however, UI improvements cannot keep BMDs from printing something other than what the voter is shown on the screen.

“marksense” machines at interpreting imperfect marks. Thus, mark legibility is not a good reason to adopt BMDs for all voters.

- **Undervotes, overvotes.** Another argument offered for BMDs is that the machines can alert voters to undervotes and prevent overvotes. That is true, but modern PCOS systems can also alert a voter to overvotes and undervotes, allowing a voter to eject the ballot and correct it.
- **Bad ballot design.** Ill-designed paper ballots, just like ill-designed touchscreen interfaces, may lead to unintentional undervotes [24]. For instance, the 2006 Sarasota, Florida, touchscreen ballot was badly designed. The 2018 Broward County, Florida, opscan ballot was badly designed: it violated three separate guidelines from the EAC’s 2007 publication, “Effective Designs for the Administration of Federal Elections, Section 3: Optical scan ballots.” [39] In both of these cases (touchscreens in 2006, hand-marked optical-scan in 2018), undervote rates were high. The solution is to follow standard, published ballot-design guidelines and other best practices, both for touchscreens and for hand-marked ballots [3, 24].
- **Low-tech paper-ballot fraud.** All paper ballots, however they are marked, are vulnerable to *loss*, *ballot-box stuffing*, *alteration*, and *substitution* between the time they are cast and the time they are recounted. That’s why it is so important to make sure that ballot boxes are always in multiple-person (preferably bipartisan) custody whenever they are handled, and that appropriate physical security measures are in place. Strong, verifiable chain-of-custody protections are essential.

Hand-marked paper ballots are vulnerable to alteration by anyone with a pen. Both hand-marked and BMD-marked paper ballots are vulnerable to substitution: anyone who has poorly supervised access to a legitimate BMD during election day can create fraudulent ballots, not necessarily to deposit them in the ballot box immediately (in case the ballot box is well supervised on election day) but with the hope of substituting it later in the chain of custody.²⁸

All those attacks (on hand-marked and on BMD-marked paper ballots) are fairly low-tech. There are also higher-tech ways of producing ballots indistinguishable from BMD-marked ballots for substitution into the ballot box if there is inadequate chain-of-custody protection.

- **Accessible voting technology.** When hand-marked paper ballots are used with PCOS, there is (as required by law) also an accessible voting technology available in the polling place for voters unable to mark a paper ballot with a pen. This

²⁸Some BMDs print a barcode indicating when and where the ballot was produced, but that does not prevent such a substitution attack against currently EAC-certified, commercially available BMDs. We understand that systems under development might make ballot-substitution attacks against BMDs more difficult.

is typically a BMD or a DRE. When the accessible voting technology is not the same as what most voters vote on—when it is used by very few voters—it may happen that the accessible technology is ill-maintained or even (in some polling places) not even properly set up by pollworkers. This is a real problem. One proposed solution is to require all voters to use the same BMD or all-in-one technology. But the failure of some election officials to properly maintain their accessible equipment is not a good reason to adopt BMDs for *all* voters. Among other things, it would expose all voters to the security flaws described above.²⁹ Other advocates object to the idea that disabled voters must use a different method of marking ballots, arguing that their rights are thereby violated. Both HAVA and ADA require reasonable accommodations for voters with physical and cognitive impairments, but neither law requires that those accommodations must be used by all voters. To best enable and facilitate participation by all voters, each voter should be provided with a means of casting a vote best suited to their abilities.

- **Ballot printing costs.** Preprinted optical-scan ballots cost 20–50 cents each.³⁰ Blank cards for BMDs cost up to 15 cents each, depending on the make and model of BMD.³¹ But optical-scan ballots must be preprinted for as many voters as *might* show up, whereas blank BMD cards are consumed in proportion to how many voters *do* show up. The Open Source Election Technology Institute (OSET) conducted an independent study of total life cycle costs³² for hand-marked paper ballots and BMDs in conjunction with the 2019 Georgia legislative debate regarding BMDs [26]. OSET concluded that, even in the most optimistic (i.e., lowest cost) scenario for BMDs and the most pessimistic (i.e., highest cost) scenario for hand-marked paper ballots and ballot-on-demand (BOD) printers—which can print unmarked ballots as needed—the total lifecycle costs for BMDs would be higher than the corresponding costs for hand-marked paper ballots.³³
- **Vote centers.** To run a vote center that serves many election districts with different ballot styles, one must be able to provide each voter a ballot containing

²⁹Also, some accessibility advocates argue that requiring disabled voters to use BMDs compromises their privacy since hand-marked ballots are easily distinguishable from machine marked ballots. That issue can be addressed without BMDs-for-all: Accessible BMDs are already available and in use that mark ballots with marks that cannot easily be distinguished from hand-marked ballots.

³⁰Single-sheet (one- or two-side) ballots cost 20-28 cents; double-sheet ballots needed for elections with many contests cost up to 50 cents.

³¹Ballot cards for ES&S ExpressVote cost about 15 cents. New Hampshire's (One4All / Prime III) BMDs used by sight-impaired voters use plain paper that is less expensive.

³²They include not only the cost of acquiring and implementing systems but also the ongoing licensing, logistics, and operating (purchasing paper stock, printing, and inventory management) costs.

³³BOD printers currently on the market arguably are best suited for vote centers, but less expensive options suited for polling places could be developed. Indeed, BMDs that print full-face ballots could be re-purposed as BOD printers for polling place use, with modest changes to the programming.

the contests that voter is eligible to vote in, possibly in a number of different languages. This is easy with BMDs, which can be programmed with all the appropriate ballot definitions. With preprinted optical-scan ballots, the PCOS can be programmed to *accept* many different ballot styles, but the vote center must still maintain *inventory* of many different ballots. BOD printers are another economical alternative for vote centers.³⁴

- **Paper/storage.** BMDs that print summary cards rather than full-face ballots can save paper and storage space. However, many BMDs print full-face ballots—so they do not save storage—while many BMDs that print summary cards (which could save storage) use thermal printers and paper that is fragile and can fade in a few months.³⁵

Advocates of hand-marked paper ballot systems advance these additional arguments.

- **Cost.** Using BMDs for all voters substantially increases the cost of acquiring, configuring, and maintaining the voting system. One PCOS can serve 1200 voters in a day, while one BMD can serve only about 260 [33]—though both these numbers vary greatly depending on the length of the ballot and the length of the day. OSET analyzed the relative costs of acquiring BMDs for Georgia’s nearly seven million registered voters versus a system of hand-marked paper ballots, scanners, and BOD printers [26]. A BMD solution for Georgia would cost taxpayers between 3 and 5 times more than a system based on hand-marked paper ballots. Open-source systems might eventually shift the economics, but current commercial universal-use BMD systems are more expensive than systems that use hand-marked paper ballots for most voters.
- **Mechanical reliability and capacity.** Pens are likely to have less downtime than BMDs. It is easy and inexpensive to get more pens and privacy screens when additional capacity is needed. If a precinct-count scanner goes down, people can still mark ballots with a pen; if the BMD goes down, voting stops. Thermal

³⁴Ballot-on-demand printers *may* require maintenance such as replacement of toner cartridges. This is readily accomplished at a vote center with a professional staff. Ballot-on-demand printers may be a less attractive option for many small precincts on election day, where there is no professional staff—but on the other hand, they are less necessary, since far fewer ballot styles will be needed in any one precinct.

³⁵The California Top-To-Bottom Review (TTBR) of voting systems found that thermal paper can also be covertly spoiled wholesale using common household chemicals <https://votingsystems.cdn.sos.ca.gov/oversight/ttbr/red-diebold.pdf>, last visited 8 April 2019. The fact that thermal paper printing can fade or deteriorate rapidly might mean it does not satisfy the federal requirement to preserve voting materials for 22 months. <http://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title52-section20701&num=0&edition=prelim>, last visited 8 April 2019.

printers used in DREs with VVPAT are prone to jams; those in BMDs might have similar flaws.

These secondary pros and cons of BMDs do not outweigh the primary security and accuracy concern: BMDs, if hacked or erroneously programmed, can change votes in a way that is not correctable. BMD voting systems are not contestable or defensible. Audits that rely on BMD printout cannot make up for this defect in the paper trail: they cannot reliably detect or correct problems that altered election outcomes.

Barcodes

A controversial feature of some BMDs allows them to print 1-dimensional or 2-dimensional barcodes on the paper ballots. A 1-dimensional barcode resembles the pattern of vertical lines used to identify products by their universal product codes. A 2-dimensional barcode or QR code is a rectangular area covered in coded image *modules* that encode more complex patterns and information. BMDs print barcodes on the same paper ballot that contains human-readable ballot choices. Voters using BMDs are expected to verify the human-readable printing on the paper ballot card, but the presence of barcodes with human-readable text poses some significant problems.

- **Barcodes are not human readable.** The whole purpose of a paper ballot is to be able to recount (or audit) the *voters'* votes in a way independent of any (possibly hacked or buggy) computers. If the official vote on the ballot card is the barcode, then it is impossible for the voters to verify that the official vote they cast is the vote they expressed. Therefore, before a state even *considers* using BMDs that print barcodes (and we do not recommend doing so), the State must ensure by statute that recounts and audits are based *only* on the human-readable portion of the paper ballot. Even so, audits based on untrustworthy paper trails suffer from the verifiability the problems outlined above.
- **Ballot cards with barcodes contain two different votes.** Suppose a state does ensure by statute that recounts and audits are based on the human-readable portion of the paper ballot. Now a BMD-marked ballot card with both barcodes and human-readable text contains two different votes in each contest: the barcode (used for electronic tabulation), and the human-readable selection printout (official for audits and recounts). In few (if any) states has there even been a discussion of the legal issues raised when the official markings to be counted differ between the original count and a recount.
- **Barcodes pose technical risks.** Any coded input into a computer system—including wired network packets, WiFi, USB thumbdrives, *and barcodes*—pose

the risk that the input-processing software can be vulnerable to attack via deliberately ill-formed input. Over the past two decades, many such vulnerabilities have been documented on *each* of these channels (including barcode readers) that, in the worst case, give the attacker complete control of a system.³⁶ If an attacker were able to compromise a BMD, the barcodes are an attack vector for the attacker to take over an optical scanner (PCOS or CCOS), too. Since it is good practice to close down all such unneeded attack vectors into PCOS or CCOS voting machines (e.g., don't connect your PCOS to the Internet!), it is also good practice to avoid unnecessary attack channels such as barcodes.

End-to-End Verifiable BMDs

In all BMD systems currently on the market, and in all BMD systems certified by the EAC, the printed ballot or ballot summary is the only channel by which voters can verify the correct recording of their ballots, independently of the computers. The analysis in this paper applies to all of those BMD systems.

There is a class of voting systems called “end-to-end verifiable” (E2E-V), which provide an alternate mechanism for voters to verify their votes [2]. Some E2E-V systems incorporate BMDs, for instance STAR-Vote³⁷ [5]. As we discuss above in Section 1, such systems are not contestable, defensible, or strongly software independent. In any event, no E2E-V system is currently certified by the EAC, nor to our knowledge is any such system under review for certification, nor are any of the 5 major voting-machine vendors offering such a system for sale.³⁸

³⁶An example of a barcode attack is based on the fact that many commercial barcode-scanner components (which system integrators use to build cash registers or voting machines) treat the barcode scanner using the same operating-system interface as if it were a keyboard device; and then some operating systems allow “keyboard escapes” or “keyboard function keys” to perform unexpected operations.

³⁷The STAR-Vote system is actually a DRE+VVPAT system with a smart ballot box, rather than a BMD system: voters interact with a device that captures their votes electronically and prints a paper record that voters can inspect, but the electronic votes are held “in limbo” until the paper ballot is deposited in the smart ballot box. The ballot box does not read the votes from the ballot; rather, depositing the ballot tells the system that it has permission to cast the vote that it had already recorded from the touchscreen.

³⁸Some vendors, notably Scytl, have sold systems advertised as E2E-V in other countries. Those systems were not in fact E2E-V. Moreover, serious security flaws have been found in their implementations. See, e.g., [21].

5 Insecurity of All-in-One BMDs

Some voting machines incorporate a BMD interface, printer, and optical scanner into the same cabinet. Other DRE+VVPAT voting machines incorporate ballot-marking, tabulation, and paper-printout retention, but without scanning. These are often called “all-in-one” voting machines. To use an all-in-one machine, the voter makes choices on a touchscreen or through a different accessible interface. When the selections are complete, the BMD prints the completed ballot for the voter to review and verify, before depositing the ballot in a ballot box attached to the machine.

Such machines are especially unsafe: like any BMD described in Section 3 they are not contestable or defensible, but in addition, if hacked they can print votes onto the ballot *after* the voter last inspects the ballot.

- The ES&S ExpressVote (in all-in-one mode) allows the voter to mark a ballot by touchscreen or audio interface, then prints a paper ballot card and ejects it from a slot. The voter has the opportunity to review the ballot, then the voter redeploys the ballot into the same slot, where it is scanned and deposited into a ballot box.
- The ES&S ExpressVoteXL allows the voter to mark a ballot by touchscreen or audio interface, then prints a paper ballot and displays it under glass. The voter has the opportunity to review the ballot, then the voter touches the screen to indicate “OK,” and the machine pulls paper ballot up (still under glass) and into the integrated ballot box.
- The Dominion ImageCast Evolution (ICE) allows the voter to deposit a hand-marked paper ballot, which it scans and drops into the attached ballot box. *Or*, a voter can use a touchscreen or audio interface to direct the marking of a paper ballot, which the voting machine ejects through a slot for review; then the voter redeploys the ballot into the slot, where it is scanned and dropped into the ballot box.

In all three of these machines, the ballot-marking printer is in the same paper path as the mechanism to deposit marked ballots into an attached ballot box. This opens up a very serious security vulnerability: the voting machine can mark the paper ballot (to add votes or spoil already-cast votes) after the last time the voter sees the paper, and then deposit that marked ballot into the ballot box without the possibility of detection.

Vote-stealing software could easily be constructed that looks for *undervotes* on the ballot, and marks those unvoted spaces for the candidate of the hacker’s choice. This is very straightforward to do on optical-scan bubble ballots (as on the Dominion ICE) where undervotes are indicated by no mark at all. On machines such as the ExpressVote

and ExpressVoteXL, the normal software indicates an undervote with the words NO SELECTION MADE on the ballot summary card. Hacked software could simply leave a blank space there (most voters wouldn't notice the difference), and then fill in that space and add a matching bar code after the voter has clicked "cast this ballot."

An even worse feature of the ES&S ExpressVote and the Dominion ICE is the *auto-cast* configuration setting (in the manufacturer's standard software) that allows the voter to indicate, "don't eject the ballot for my review, just print it and cast it without me looking at it." If fraudulent software were installed in the ExpressVote, it could change *all* the votes of any voter who selected this option, because the voting machine software would know *in advance of printing* that the voter had waived the opportunity to inspect the printed ballot. We call this auto-cast feature "permission to cheat" [4].

Regarding these all-in-one machines, we conclude:

- Any machine with ballot printing in the same paper path with ballot deposit is not *software independent*; it is *not* the case that "an error or fault in the voting system software or hardware cannot cause an undetectable change in election results." Therefore such all-in-one machines do not comply with the VVSG 2.0 (the Election Assistance Commission's Voluntary Voting Systems Guidelines). Such machines are not contestable or defensible, either.
- All-in-one machines on which all voters use the BMD interface to mark their ballots (such as the ExpressVote and ExpressVoteXL) *also* suffer from the same serious problem as ordinary BMDs: most voters do not review their ballots effectively, and elections on these machines are not contestable or defensible.
- The auto-cast option for a voter to allow the paper ballot to be cast without human inspection is particularly dangerous, and states must insist that vendors disable or eliminate this mode from the software. However, even disabling the auto-cast feature does not eliminate the risk of undetected vote manipulation.

Remark. The Dominion ImageCast Precinct ICP320 is a precinct-count optical scanner (PCOS) that also contains an audio+buttons ballot-marking interface for disabled voters. This machine can be configured to cast electronic-only ballots from the BMD interface, or an external printer can be attached to print paper optical-scan ballots from the BMD interface. When the external printer is used, that printer's paper path is *not* connected to the scanner+ballot-box paper path (a person must take the ballot from the printer and deposit it into the scanner slot). Therefore this machine is as safe to use as any PCOS with a separate external BMD.

6 Conclusion

Ballot-Marking Devices produce ballots that do not necessarily record the vote expressed by the voter when they enter their selections on the touchscreen: hacking, bugs, and configuration errors can cause the BMDs to print votes that differ from what the voter entered and verified electronically. Because outcome-changing errors in BMD printout do not produce public evidence, BMD systems are not *contestable*. Because there is no way to generate convincing public evidence that reported outcomes are correct despite any BMD malfunctions that might have occurred, BMD systems are not *defensible*. Therefore, BMDs should not be used by voters who can hand mark paper ballots.

All-in-one voting machines, which combine ballot-marking and ballot-box-deposit into the same paper path, are even worse. They have all the disadvantages of BMDs (they are not contestable or defensible), and they can mark the ballot after the voter has inspected it. Therefore they are not even *software independent*, and should not be used by those voters who are capable of marking, handling, and visually inspecting a paper ballot.

When computers are used to record votes, the original transaction (the voter's expression of the votes) is not documented in a verifiable way.³⁹ When pen-and-paper is used to record the vote, the original expression of the vote *is* documented in a verifiable way (if demonstrably secure chain of custody of the paper ballots is maintained). Audits of elections conducted with hand-marked paper ballots, counted by optical scanners, can ensure that reported election outcomes are correct. Audits of elections conducted with BMDs *cannot* ensure that reported outcomes are correct.

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REPORT OF REVIEW OF DOMINION VOTING SYSTEMS DEMOCRACY SUITE 5.5-A

PRELIMINARY STATEMENT

On October 2-3, 2019, Dominion Voting Systems ("Dominion" or the "Vendor") presented the Democracy Suite 5.5-A system for examination and certification. The examination was conducted in Austin, Texas. Pursuant to Sections 122.035(a) and (b) of the Texas Election Code, the Secretary of State appointed the following examiners:

1. Mr. Tom Watson, an expert in electronic data communication systems;
2. Mr. Brian Mechler, an expert in electronic data communication systems;
3. Mr. Brandon Hurley, an expert in election law and procedure; and
4. Mr. Charles Pinney, an expert in election law and procedure.

Pursuant to Section 122.035(a), the Texas Attorney General appointed the following examiners:

1. Dr. Jim Sneeringer, an expert in electronic data communication systems; and
2. Mr. Ryan Vassar, an employee of the Texas Attorney General.

On October 2, 2019, Mr. Pinney, Mr. Mechler, and Dr. Sneeringer witnessed the installation of the Democracy Suite 5.5-A software and firmware that the Office of the Texas Secretary of State (the "Office") received directly from the Independent Testing Authority. The next day, Mr. Pinney examined the accessibility components of the ImageCast X Ballot Marking Device.

On October 3, 2019, the Vendor demonstrated the Democracy Suite 5.5-A system and answered questions presented by the examiners. Test ballots were then processed on each voting device. The results were accumulated and later verified for accuracy by staff of the Secretary of State.

Examiner reports regarding the Democracy Suite 5.5-A system are attached hereto and incorporated herein by this reference.

BRIEF DESCRIPTION OF DEMOCRACY SUITE 5.5-A

The Democracy Suite 5.5-A system is an updated version of the Democracy Suite 5.5 system, which was denied certification by the Office on June 20, 2019. The Democracy Suite 5.5-A system includes certain software and hardware updates to the Suite 5.5 version.

Democracy Suite 5.5-A has been evaluated at an accredited independent voting system laboratory for conformance to the 2005 Voluntary Voting System Guidelines (VVSG). Democracy Suite 5.5-A was certified by the Election Assistance Commission (EAC) on January 30, 2019.

The components of Democracy Suite 5.5-A are as follows:

| Component | Version | Description |
|----------------------------------|----------------|----------------------------|
| EMS – Election Management System | 5.5.12.1 | Election Management System |
| ADJ – Adjudication | 5.5.8.1 | |
| ICC – ImageCast Central | 5.5.3.0002 | Central scanner |
| ICX – ImageCast X BMD | 5.5.10.30 | Ballot marking device |
| ICP – ImageCast Precinct | 5.5.3-0002 | Precinct scanner |

FINDINGS

The following are the findings, based on written evidence submitted by the Vendor in support of its application for certification, oral evidence presented at the examination, and the findings of the voting system examiners as set out in their written reports.

The examiner reports identified multiple hardware and software issues that preclude the Office of the Texas Secretary of State from determining that the Democracy Suite 5.5-A system satisfies each of the voting-system requirements set forth in the Texas Election Code. Specifically, the examiner reports raise concerns about whether the Democracy Suite 5.5-A system is suitable for its intended purpose; operates efficiently and accurately; and is safe from fraudulent or unauthorized manipulation. Therefore, the Democracy Suite 5.5-A system and corresponding hardware devices do not meet the standards for certification prescribed by Section 122.001 of the Texas Election Code.

CONCLUSION

Accordingly, based upon the foregoing, I hereby deny certification of Dominion Voting Systems' Democracy Suite 5.5-A system for use in Texas elections.

Signed under my hand and seal of office, this 24th day of January 2020.

A handwritten signature in black ink, appearing to read "Jose A. Esparza", is written over a horizontal line.

JOSE A. ESPARZA
DEPUTY SECRETARY OF STATE

Declaration of [REDACTED]

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

1. I am over the age of 21 years and I am under no legal disability, which would prevent me from giving this declaration.
2. I was an electronic intelligence analyst under 305th Military Intelligence with experience gathering SAM missile system electronic intelligence. I have extensive experience as a white hat hacker used by some of the top election specialists in the world. The methodologies I have employed represent industry standard cyber operation toolkits for digital forensics and OSINT, which are commonly used to certify connections between servers, network nodes and other digital properties and probe to network system vulnerabilities.
3. I am a US citizen and I reside [REDACTED] location in the United States of America.
4. Whereas the Dominion and Edison Research systems exist in the internet of things, and whereas this makes the network connections between the Dominion, Edison Research and related network nodes available for scanning,
5. And whereas Edison Research's primary job is to report the tabulation of the count of the ballot information as received from the tabulation software, to provide to Decision HQ for election results,
6. And whereas Spiderfoot and Robtex are industry standard digital forensic tools for evaluation network security and infrastructure, these tools were used to conduct public security scans of the aforementioned Dominion and Edison Research systems,
7. A public network scan of Dominionvoting.com on 2020-11-08 revealed the following inter-relationships and revealed 13 unencrypted passwords for dominion employees, and 75 hashed passwords available in TOR nodes:



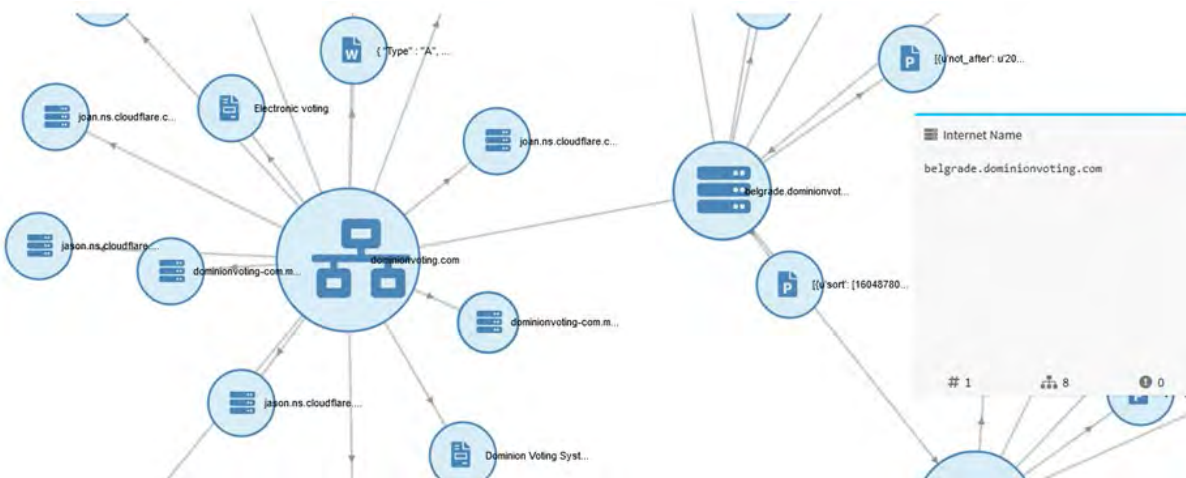
```

Array
(
    [id] => 544167324
    [luser] => ian.macvicar
    [domain] => dominionvoting.com
    [password] => jamley
)

7
Array
(
    [id] => 599400504
    [luser] => jelena.tanaskovic
    [domain] => dominionvoting.com
)

```

8. The same public scan also showed a direct connection to the group in Belgrade as highlighted below:



→ robtex.com/dns-lookup/dominionvoting.com

8 results shown.

IP numbers of the name servers

2400:cb00:2049:1::adf5:3bb3
 2606:4700:50::adf5:3aad
 2803:f800:50::6ca2:c0ad
 2803:f800:50::6ca2:c1b3
 2a06:98c1:50::ac40:20ad
 108.162.192.173
 108.162.193.170

Subdomains/Hostnames

Domains or hostnames one step under this dom

barracuda.dominionvoting.com
belgrade.dominionvoting.com
 webmail.dominionvoting.com
 www.dominionvoting.com

4 results shown.

9. A cursory search on LinkedIn of “dominion voting” on 11/19/2020 confirms the numerous employees in Serbia:



Vukašin Đorđević • 3rd

Software Developer at Dominion Voting Systems
 Serbia



Edvan Sabanovic • 3rd

Senior Full-stack Web Developer
 Belgrade, Serbia

Past: Senior Web Developer at Dominion Voting Systems

10. An additional search of Edison Research on 2020-11-08 showed that Edison Research has an Iranian server seen here:



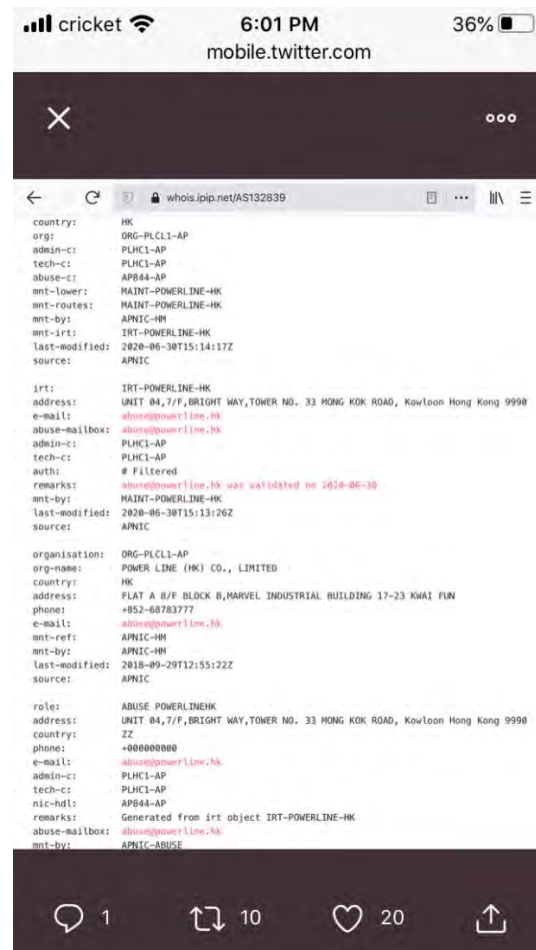
Inputting the Iranian IP into Robtex confirms the direct connection into the “edisonresearch” host from the perspective of the Iranian domain also. This means that it is not possible that the connection was a unidirectional reference.

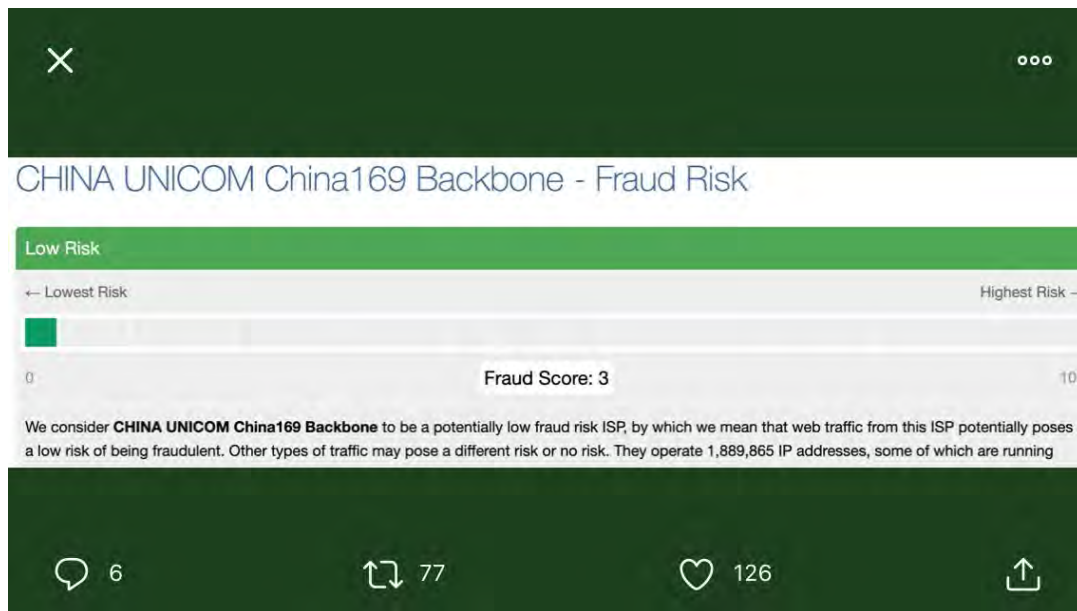
| QUICK INFO | |
|--|---------------------------------|
| Quick summary of the host name | |
| edisonresearch.xn--mgb3a4fra.ir quick info | |
| General | |
| FQDN | edisonresearch.xn--mgb3a4fra.ir |
| Host Name | edisonresearch |
| Domain Name | xn--mgb3a4fra.ir |
| Registry | ir |
| TLD | ir |
| SHARED | |
| This section shows related hostnames and ipnubers. | |
| On other TLD:s and domains | |
| This sub section shows this name on other top level domains. | |
| xn--mgb3a4fra.com | |
| xn--mgb3a4fra.net | |
| xn--mgb3a4fra.tk | |
| 3 results shown. | |

A deeper search of the ownership of Edison Research “edisonresearch.com” shows a connection to BMA Capital Management, where shareofear.com and bmacapital.com are both connected to edisonresearch.com via a VPS or Virtual Private Server, as denoted by the “vps” at the start of the internet name:



Dominionvoting is also dominionvotingsystems.com, of which there are also many more examples, including access of the network from China. The records of China accessing the server are reliable.





Domain Name: dominionvotingsystems.com
Registry Domain ID: 2530599738_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: http://www.godaddy.com
Updated Date: 2020-05-26T15:48:58Z
Creation Date: 2020-05-26T15:48:57Z
Registrar Registration Expiration Date: 2021-05-26T15:48:57Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.4806242505
Domain Status: clientTransferProhibited <http://www.icann.org/epp#clientTransferProhibited>
Domain Status: clientUpdateProhibited <http://www.icann.org/epp#clientUpdateProhibited>
Domain Status: clientRenewProhibited <http://www.icann.org/epp#clientRenewProhibited>
Domain Status: clientDeleteProhibited <http://www.icann.org/epp#clientDeleteProhibited>
Registrant Organization:
Registrant State/Province: Hunan
Registrant Country: CN
Registrant Email: Select Contact Domain Holder link at
<https://www.godaddy.com/whois/results.aspx?domain=dominionvotingsystems.com>
Admin Email: Select Contact Domain Holder link at
<https://www.godaddy.com/whois/results.aspx?domain=dominionvotingsystems.com>
Tech Email: Select Contact Domain Holder link at
<https://www.godaddy.com/whois/results.aspx?domain=dominionvotingsystems.com>
Name Server: NS1.DNS.COM
Name Server: NS2.DNS.COM
DNSSEC: unsigned

Overview - dominionvotingsystems.com

DNS Records4

| Type | Value | OSH | Security score |
|------|--|---|---|
| A | <div><div><div><div></div></div><div>45.195.162.194 - AS132839 - POWER LINE DATACENTER</div></div></div> | 2 | <div><div><div></div></div><div>15</div></div> |
| NS | <div><div><div><div></div></div><div>ns1.dns.com</div></div><div><div><div><div></div></div><div>27.152.186.193 - AS133776 - Quanzhou</div></div><div><div><div><div></div></div><div>119.167.180.131 - AS4837 - CHINA UNICOM China169 Bsc...</div></div><div><div><div><div></div></div><div>218.98.111.202 - AS132859 - ZNET</div></div></div></div></div></div> | <div>9</div> <div>8</div> <div>14</div> | <div><div><div></div></div><div>100</div></div> <div><div><div></div></div><div>100</div></div> <div><div><div></div></div><div>100</div></div> |
| | <div><div><div><div></div></div><div>ns2.dns.com</div></div><div><div><div><div></div></div><div>183.253.57.193 - AS9808 - Guangdong Mobile Communic...</div></div><div><div><div><div></div></div><div>121.12.104.65 - AS134763 - CHINANET Guangdong provin...</div></div></div></div></div> | <div>6</div> <div>4</div> | <div><div><div></div></div><div>100</div></div> <div><div><div></div></div><div>100</div></div> |
| | <div><div><div><div></div></div><div>ns1.dns.com</div></div><div><div><div><div></div></div><div>HostName</div></div><div><div><div><div></div></div><div>dnsadmin.dns.com</div></div></div></div></div> | | |

View all DNS Records

Domains with same A records - dominionvotingsystems.com

1 Domains with same A records

| Domain | Site Title | Alexa rank | DNS A | OSH | DNS CNAME |
|--|------------|------------|---|-----|-----------|
| <div><div><div></div></div><div>isomglobal.com</div></div> | — | — | <div><div><div></div></div><div>45.195.162.194 - AS132839 - POWER LINE DATACENTER</div></div> | 7 | — |

CVE - dominionvotingsystems.com

22 CVE

Columns

Copy

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| ID | Base Score | Severity | Vector | Source | Description |
|--------------------------------|------------|----------|-------------------------|--------------------------------|--|
| CVE-2018-2860 | 2.6 | LOW | AV:N/A/C/N/A/P:R/N | 45.195.162.194 | In OpenSSH 7.5, scp.c in the scp client allows remote SSH servers to bypass intended access restrictions via the filename of, or an empty filename. The impact is modifying the permissions of the target directory on the client side. |
| CVE-2019-8964 | 6.9 | MEDIUM | AV:L/AC/M/A/N/C/C:R/CAC | 45.195.162.194 | Use-after-free vulnerability in the mem_answer_gam_new_ctx function in monitor.c in sshd in OpenSSH before 7.2 on non-OpenBSD platforms might allow local users to gain privileges by leveraging control of the sshd uid to send an unexpectedly early MONITOR_REQ_PAM_FREE_CTX request. |
| CVE-2018-1888 | 7.5 | HIGH | AV:N/A/C/N/A/N:C/P:R/P | 45.195.162.194 | The client in OpenSSH before 7.2 mishandles failed cookie generation for untrusted X11 forwarding and relies on the local X11 server for access control decisions, which allows remote X11 clients to trigger a fallback and obtain trusted X11 forwarding privileges by leveraging configuration issues on this X11 server, as demonstrated by lack of the SPCWTF extension on this X11 server. |
| CVE-2019-10810 | 6.9 | MEDIUM | AV:L/AC/M/A/N/C/C:R/CAC | 45.195.162.194 | sshd in OpenSSH before 7.4, when privilege separation is not used, creates forwarded Unix-domain sockets as root, which might allow local users to gain privileges via unspecified vectors, related to serverloop.c. |
| CVE-2018-4331 | 7.8 | HIGH | AV:N/A/C/N/A/N:C/R/N/C | 45.195.162.194 | The auth_password function in auth-passwd.c in sshd in OpenSSH before 7.3 does not limit password lengths for password authentication, which allows remote attackers to cause a denial of service (crash/CPU consumption) via a long string. |
| CVE-2018-5885 | 8.5 | HIGH | AV:N/A/C/N/A/N:C/R/N/C | 45.195.162.194 | The libssh_agent_device function in auth-chroot.c in sshd in OpenSSH through 6.8 does not properly restrict the processing of keyboard-interactive devices within a single connection, which makes it easier for remote attackers to conduct brute-force attacks or cause a denial of service (CPU consumption) via a long and duplicative list in the ssh-askpassInteractiveDevices option, as demonstrated by a modified client that provides a different password for each open element on this list. |
| CVE-2019-4367 | 1.9 | LOW | AV:L/AC/M/A/N/C/P:R/N | 45.195.162.194 | The monitor component in sshd in OpenSSH before 7.8 on non-OpenBSD platforms accepts extraneous username data in MONITOR_REQ_PAM_INT_CTX requests, which allows local users to conduct impersonation attacks by leveraging any SSH login success in conjunction with control of the sshd uid to send a crafted MONITOR_REQ_PAM_INT request, related to monitor.c and monitor.c, and scp.c. |
| CVE-2018-13919 | 5 | MEDIUM | AV:N/A/C/N/A/N:C/P:R/N | 45.195.162.194 | Remotely observable behaviour in auth-gss.c in sshd in OpenSSH through 7.8 could be used by remote attackers to detect existence of users on a target system when GSSAPI is in use. NOTE: the discover status. We understand that the OpenSSH developers do not want to treat such a username enumeration (or "brute") as a vulnerability. |

CVE - dominionvotingsystems.com

CVE-2020-12778

6.8

MEDIUM

AV:N/A/C/N/A/N:C/P:R/P

[45.195.162.194](#)

scp in OpenSSH through 8.3p1 allows command injection in the scp.c toremote function, as demonstrated by backtick characters in the destination argument. NOTE: the vendor reportedly has stated that they intentionally omit validation of "anomalous argument transfers" because that could "stand a great chance of breaking existing workflows".

CVE-2019-0110

4

MEDIUM

AV:N/A/C/N/A/N:C/P:R/N

[45.195.162.194](#)

In OpenSSH 7.5, due to accepting and displaying arbitrary idempotent output from the server, a malicious server (or Man-in-the-Middle attacker) can manipulate the client output, for example to use ANSI control codes to hide additional files being transferred.

CVE-2018-13913

2.1

LOW

AV:L/AC/M/A/N/C/P:R/N

[45.195.162.194](#)

authlib.c in sshd in OpenSSH before 7.4 does not properly consider the effects of redirc on buffer contents, which might allow local users to obtain sensitive private-key information by leveraging access to a privilege-separated child process.

CVE-2016-10012

7.2

HIGH

AV:L/AC/M/A/N/C/C:R/CAC

[45.195.162.194](#)

The shared memory manager (associated with pre-authentication compression) in sshd in OpenSSH before 7.4 does not ensure that a security check is enforced by all connections, which might allow local users to gain privileges by leveraging access to a nonstandard privilege separation process, related to the m_block and m_zlib data structures.

CVE-2019-5353

4.3

MEDIUM

AV:N/A/C/N/A/N:C/P:R/N

[45.195.162.194](#)

The x11_agent_helper function in channels.c in sshd in OpenSSH before 6.8, when ForwardX11Trusted mode is not used, lacks a check of the refused deadline for X connections, which makes it easier for remote attackers to bypass intended access restrictions via a connection outside of the permitted time window.

CVE-2019-8425

7.2

HIGH

AV:L/AC/M/A/N/C/C:R/CAC

[45.195.162.194](#)

The do_setup_new function in session.c in sshd in OpenSSH through 7.3p1, when the UseLogin feature is enabled and PAM is configured to read gam_environment files in user home directories, allows local users to gain privileges by triggering a crafted environment for the /bin/login program, as demonstrated by an LD_PRELOAD environment variable.

CVE-2016-13008

7.5

HIGH

AV:N/A/C/N/A/N:C/P:R/P

[45.195.162.194](#)

Untrusted search path vulnerability in ssh-agent.c in ssh-agent in OpenSSH before 7.4 allows remote attackers to execute arbitrary local POC/PS1 modules by leveraging control over a forwarded agent socket.

CVE-2016-21758

5

MEDIUM

AV:N/A/C/N/A/N:C/P:R/P

[45.195.162.194](#)

sshd in OpenSSH before 7.4 allows remote attackers to cause a denial of service (DoS, pointer dereference and daemon crash) via an out-of-sequence NEWKEYS message, as demonstrated by Hsienghang, related to henc.c and packet.c.

CVE-2019-4363

4

MEDIUM

AV:N/A/C/N/A/N:C/P:R/N

[45.195.162.194](#)

An issue was discovered in OpenSSH 7.5. Due to missing character encoding in the progress display, a malicious server (or Man-in-the-Middle attacker) can employ crafted object names to manipulate the client output, e.g., by using ANSI control codes to hide additional files being transferred. This affects refind, progress, master in progressmaster.c.

CVE-2018-6212

4.3

MEDIUM

AV:N/A/C/N/A/N:C/P:R/N

[45.195.162.194](#)

sshd in OpenSSH before 7.3, when SHA256 or SHA512 are used for user password hashing, uses BLOWFISH hashing on a static password when the username does not exist, which allows remote attackers to enumerate users by leveraging the timing difference between responses when a large password is provided.

CVE-2020-14145

4.3

MEDIUM

AV:N/A/C/N/A/N:C/P:R/N

[45.195.162.194](#)

The client side in OpenSSH 5.7 through 8.3 has an Observable Discrepancy leading to an information leak in the algorithm negotiation. This allows in-the-middle attackers to target initial connection attempts (before no host key for the server has been cached by the client).

CVE-2016-3115

5.5

MEDIUM

AV:N/A/C/N/A/N:C/P:R/N

[45.195.162.194](#)

Multiple CVE rejection vulnerabilities in sshd.c in sshd in OpenSSH before 7.2p2 allow remote authenticated users to bypass intended shell-command restrictions via crafted X11 forwarding data, related to the (1) do_authentication and (2) session_x11_req functions.

11. BMA Capital Management is known as a company that provides Iran access to capital markets with direct links publicly discoverable on LinkedIn (found via google on 11/19/2020):

www.linkedin.com > muhammad-talha-a0759660

Muhammad Talha - BMA Capital Management Limited

Manager, Money Market & Fixed Income at **BMA Capital Management Limited**. **BMA Capital** ...

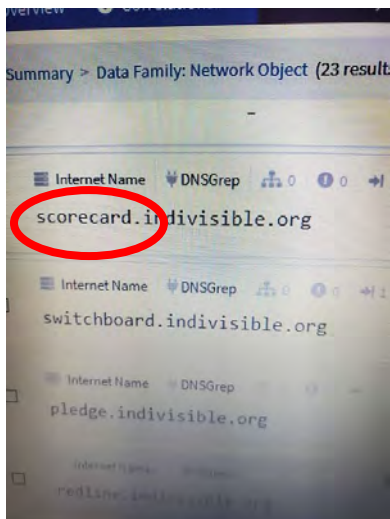
Manager-FMR at Pak Iran Joint Investment Company, Pakistan.

Pakistan · Manager, Money Market & Fixed Income · BMA Capital Management Limited

The same Robtex search confirms the Iranian address is tied to the server in the Netherlands, which correlates to known OSINT of Iranian use of the Netherlands as a remote server (See Advanced Persistent Threats: APT33 and APT34):



12. A search of the indivisible.org network showed a subdomain which evidences the existence of scorecard software in use as part of the Indivisible (formerly ACORN) political group for Obama:



13. Each of the tabulation software companies have their own central reporting “affiliate”.

Edison Research is the affiliate for Dominion.

14. Beanfield.com out of Canada shows the connections via co-hosting related sites, including dvscorp.com:

This domain redirects to **beanfield.com**

DNS

View domain name system records, including but not limited to the A, CNAME, MX, and TXT records.

[View API →](#)

| | | |
|----|----------------------------------|----------------------|
| A | 96.45.195.194 | 5 Domains → |
| MX | 10 barracuda.dominionvoting.com. | 2 Domains → |
| NS | ns29.domaincontrol.com. | 56,979,357 Domains → |
| | ns30.domaincontrol.com. | 56,979,357 Domains → |

Co-Hosted

There are 5 domains hosted on 96.45.195.194 (AS21949 Beanfield Technologies Inc.). [Show All →](#)

[View API →](#)

| | | |
|--|-------------------------------|-----------------------------|
| guta.ca | ndbgroup.ca | dvscorp.com |
| aiyokuacardioulounge.com | grantdyer.com | |

This Dominion partner domain “dvscopr” also includes an auto discovery feature, where new in-network devices automatically connect to the system. The following diagram shows some of the related dvscopr.com mappings, which mimic the infrastructure for Dominion and are an obvious typo derivation of the name. Typo derivations are commonly purchased to catch redirect traffic and sometimes are used as honeypots. The diagram shows that infrastructure spans multiple different servers as a methodology.

dvs

✓ PASSED | Elements: 34 | Correlations: 0 | Duration: 6:13:53

Overview | Correlations... | Browse by... | Starred | Visualize... | Settings | Logs

Data Summary > Data Type: Similar Domain (10 results)

| Data Element | Source Data Element |
|---|--|
| <input type="checkbox"/> Similar Domain TLD Searcher 1 0 1 0 1 0 dvscopr.اير.ان.ir | Internet Name SpiderFoot UI 9 0 1 0 dvscopr.com |
| <input type="checkbox"/> Similar Domain Tool - DNSTwist 1 0 1 0 1 0 dv.scopr.com | Domain Name SpiderFoot UI 7 0 1 0 dvscopr.com |
| <input type="checkbox"/> Similar Domain Tool - DNSTwist 1 0 1 0 1 0 dvscorp.com | Domain Name SpiderFoot UI 7 0 1 0 dvscopr.com |
| <input type="checkbox"/> Similar Domain TLD Searcher 1 0 1 0 1 0 dvscopr.台湾 | Internet Name SpiderFoot UI 9 0 1 0 dvscopr.com |
| <input type="checkbox"/> Similar Domain TLD Searcher 1 0 1 0 1 0 dvscopr.fin.ci | Internet Name SpiderFoot UI 9 0 1 0 dvscopr.com |

| | | |
|--------------------------|--|--|
| <input type="checkbox"/> | Domain Name: DSVCORP.COM Registry Domain ID: 134773082_DOMAIN_COM-VRSN Registrar WHOIS Server: whois.bookmyname.com Registrar URL: http://www.bookmyname.com Updated Date: 2018-08-23T10:00:07Z | dsvcorp.com |
| <input type="checkbox"/> | Similar Domain - Whois Whois 0 0 2 1 % This is the IRRNIC Whois server v1.6.2. % Available on web at http://whois.nic.ir/ % Find the terms and conditions of use on http://www.nic.ir/ % % This domain uses HTTP as the protocol for contacts and responses | Similar Domain TLD Searcher 1 0 0 1 dvscopr.ایران |
| <input type="checkbox"/> | Similar Domain TLD Searcher 0 0 0 1 dvscopr.caa.li | Internet Name SpiderFoot UI 9 0 0 1 dvscopr.com |
| <input type="checkbox"/> | Similar Domain TLD Searcher 1 0 0 1 dvscopr.hasura-app.io | Internet Name SpiderFoot UI 9 0 0 1 dvscopr.com |
| <input type="checkbox"/> | Similar Domain TLD Searcher 0 0 0 1 dvscopr.rackmaze.com | Internet Name SpiderFoot UI 9 0 0 1 dvscopr.com |
| <input type="checkbox"/> | Similar Domain TLD Searcher 1 0 0 1 dvscopr.devices.resinstaging.io | Internet Name SpiderFoot UI 9 0 0 1 dvscopr.com |
| <input type="checkbox"/> | Similar Domain TLD Searcher 1 0 0 1 dvscopr.cust.dev.thingdust.io | Internet Name SpiderFoot UI 9 0 0 1 dvscopr.com |

The above diagram shows how these domains also show the connection to Iran and other places, including the following Chinese domain, highlighted below:



15. The auto discovery feature allows programmers to access any system while it is connected to the internet once it's a part of the constellation of devices (see original Spiderfoot graph).
16. Dominion Voting Systems Corporation in 2019 sold a number of their patents to China (via HSBC Bank in Canada):

Assignment details for assignee "HSBC BANK CANADA, AS COLLATERAL AGENT"

Assignments (1 total)

Assignment 1

| Reel/frame | Execution date | Date recorded | Pages |
|-------------|----------------|---------------|-------|
| 050500/0236 | Sep 25, 2019 | Sep 26, 2019 | 7 |

Conveyance

SECURITY AGREEMENT

Assignors

DOMINION VOTING SYSTEMS CORPORATION

Correspondent

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Attorney docket

Assignee

HSBC BANK CANADA, AS COLLATERAL AGENT

4TH FLOOR, 70 YORK STREET

TORONTO M5J 1S9

CANADA

Properties (18)

| Patent | Publication | Application | PCT | International registration |
|---------|-------------|-------------|-----|----------------------------|
| 8844813 | 20130306724 | 13476836 | | |
| 8913787 | 20130301873 | 13470091 | | |
| 9202113 | 20150071501 | 14539684 | | |
| 8195505 | 20050247783 | 11121997 | | |
| 9870666 | 20120232963 | 13463536 | | |
| 9710988 | 20120259680 | 13525187 | | |
| 9870667 | 20120259681 | 13525208 | | |
| 7111782 | 20040238632 | 10811969 | | |
| 7422151 | 20070012767 | 11526028 | | |
| D599131 | | 29324281 | | |

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Of particular interest is a section of the document showing aspects of the nature of the patents dealing with authentication:

Patent assignment 050500/0236

SECURITY AGREEMENT

Date recorded
Sep 26, 2019

Reel/frame
050500/0236

Pages
7

Assignors
DOMINION VOTING SYSTEMS CORPORATION

Execution date
Sep 25, 2019

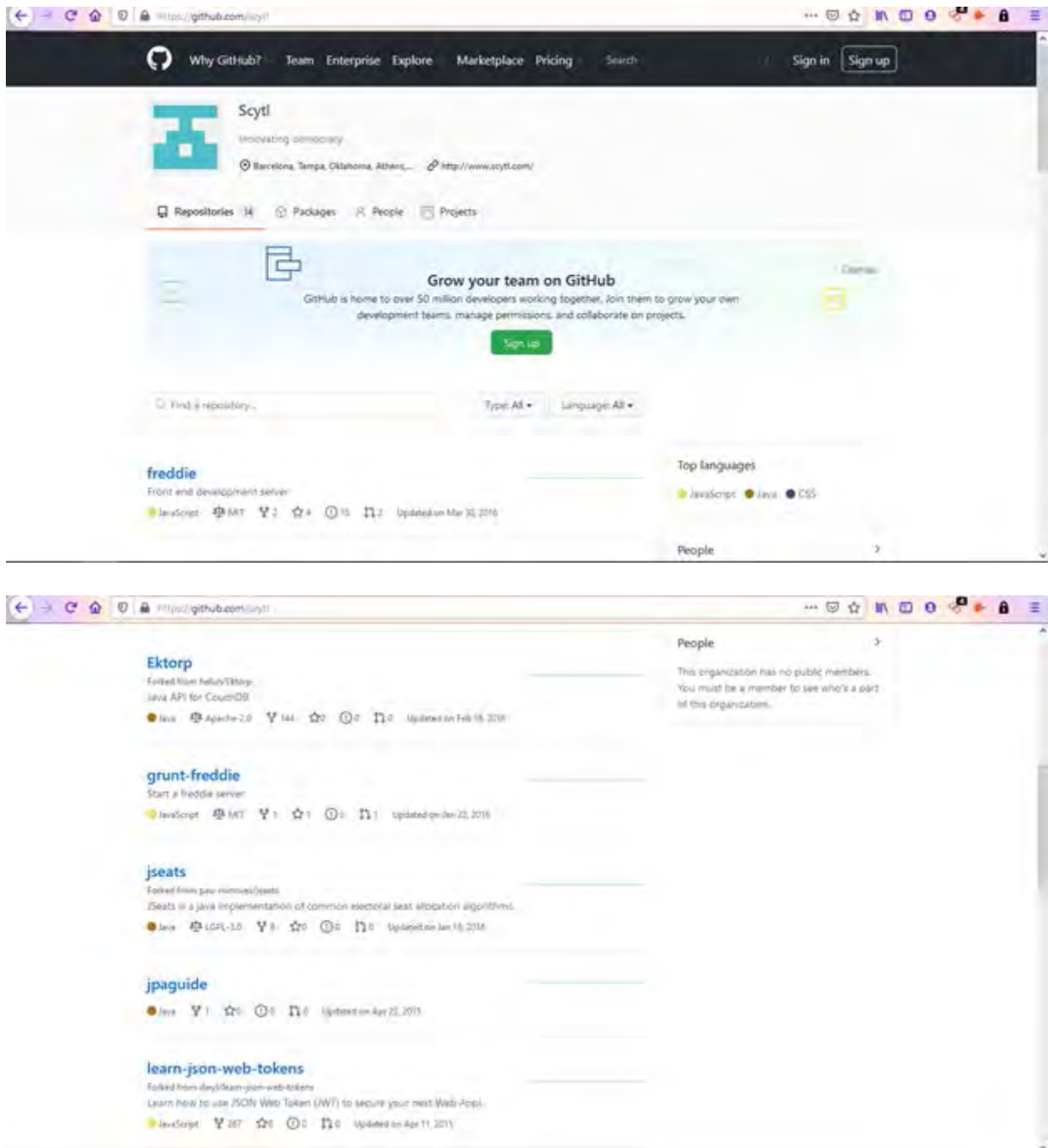
Assignee
HSBC BANK CANADA, AS COLLATERAL AGENT
4TH FLOOR, 70 YORK STREET
TORONTO M5J 1S9
CANADA

Correspondent
CHAPMAN & CUTLER LLP
1270 AVENUE OF THE AMERICAS, 30TH FLOOR
ATTN: SOREN SCHWARTZ
NEW YORK, NY 10020

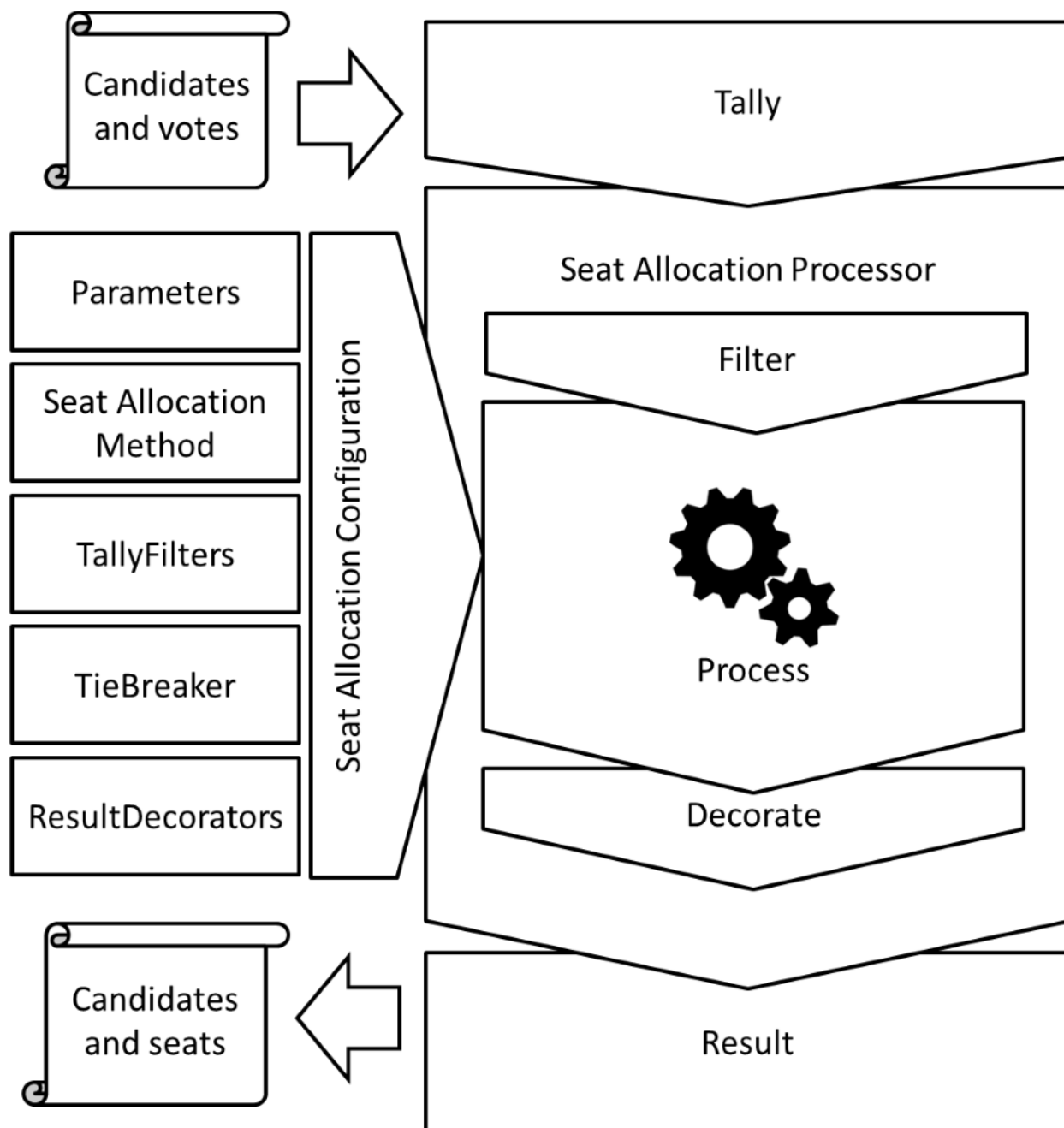
Properties (18 total)

| Patent | Publication | Application |
|---|-----------------------------|--------------------------|
| 1. SYSTEMS AND METHODS FOR PROVIDING SECURITY IN A VOTING MACHINE Inventors: JOHN PAUL HOMEWOOD, THOMAS E. KEELING, PAUL DAVID TERWILLIGER, MARC R. LATOUR | | |
| 7111782 Sep 26, 2006 | 20040238632 Dec 2, 2004 | 10811969 Mar 30, 2004 |
| 2. SYSTEM, METHOD AND COMPUTER PROGRAM FOR VOTE TABULATION WITH AN ELECTRONIC AUDIT TRAIL Inventors: JOHN POULOS, JAMES HOOVER, NICK IKONOMAKIS, GORAN OBRADOVIC | | |
| 8195505 Jun 5, 2012 | 20050247783 Nov 10, 2005 | 11121997 May 5, 2005 |
| 3. SYSTEMS AND METHODS FOR PROVIDING SECURITY IN A VOTING MACHINE Inventors: JOHN PAUL HOMEWOOD, THOMAS E. KEELING, PAUL DAVID TERWILLIGER, MARC R. LATOUR | | |
| 7422151 Sep 9, 2008 | 20070012767 Jan 18, 2007 | 11526028 Sep 25, 2006 |
| 4. BALLOT LEVEL SECURITY FEATURES FOR OPTICAL SCAN VOTING MACHINE CAPABLE OF BALLOT IMAGE PROCESSING, SECURE BALLOT PRINTING, AND BALLOT LAYOUT AUTHENTICATION AND VERIFICATION Inventors: ERIC COOMER, LARRY KORB, BRIAN GLENN LIERMAN | | |

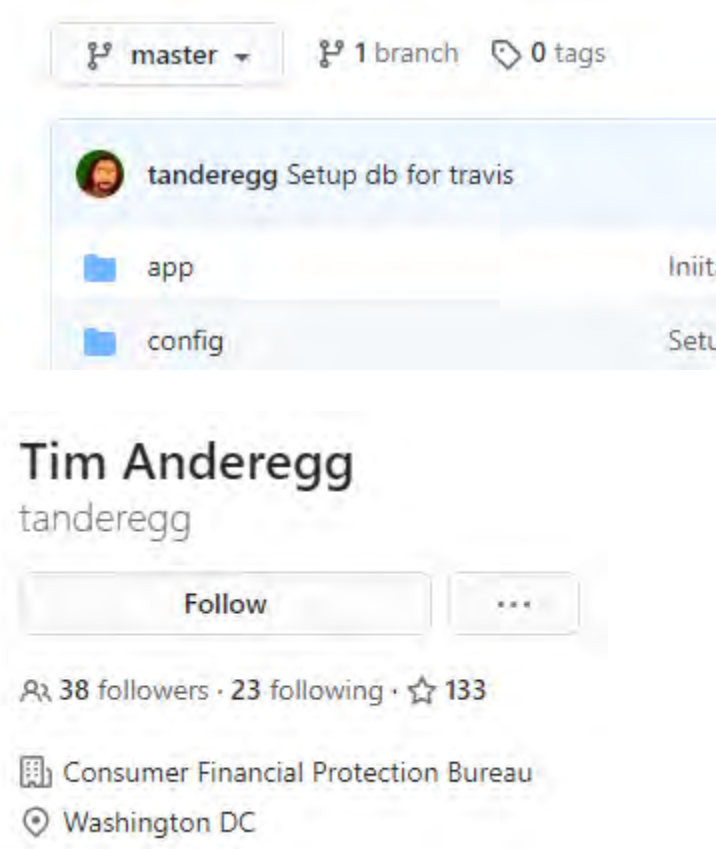
17. Smartmatic creates the backbone (like the cloud). SCYTL is responsible for the security within the election system.



18. In the GitHub account for ScytI, ScytI Jseats has some of the programming necessary to support a much broader set of election types, including a decorator process where the data is smoothed, see the following diagram provided in their source code:



19. Unrelated, but also a point of interest is CTCL or Center for Tech and Civic Life funded by Mark Zuckerberg. Within their github page (<https://github.com/ctcl>), one of the programmers holds a government position. The Bipcoop repo shows tanderegg as one of the developers, and he works at the Consumer Financial Protection Bureau:



20. As seen in included document titled

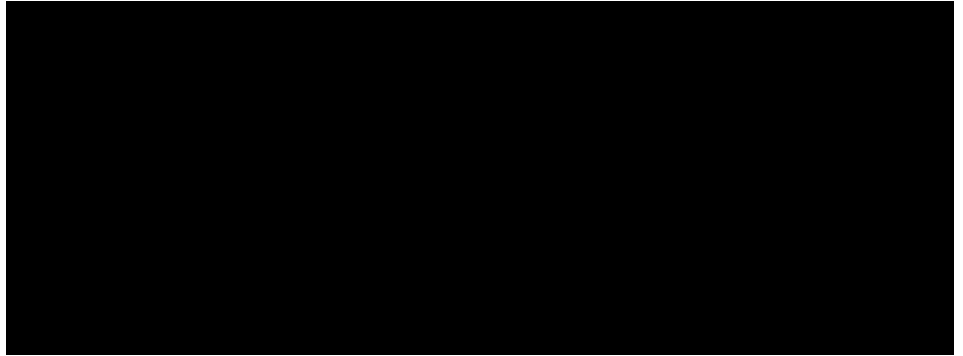
“AA20-304A-

Iranian_Advanced_Persistent_Threat_Actor_Identified_Obtaining_Voter_Registration_Data” that was authored by the Cybersecurity & Infrastructure Security Agency (CISA) with a Product ID of AA20-304A on a specified date of October 30, 2020, CISA and the FBI reports that Iranian APT teams were seen using ACUTENIX, a website scanning software, to find vulnerabilities within Election company websites, confirmed to be used by the Iranian APT teams buy seized cloud storage that I had personally captured and reported to higher authorities. These scanning behaviors showed that foreign agents of aggressor nations had access to US voter lists, and had done so recently.

21. In my professional opinion, this affidavit presents unambiguous evidence that Dominion Voter Systems and Edison Research have been accessible and were certainly compromised by rogue actors, such as Iran and China. By using servers and employees connected with rogue actors and hostile foreign influences combined with numerous easily discoverable leaked credentials, these organizations neglectfully allowed foreign adversaries to access data

and intentionally provided access to their infrastructure in order to monitor and manipulate elections, including the most recent one in 2020. This represents a complete failure of their duty to provide basic cyber security. This is not a technological issue, but rather a governance and basic security issue: if it is not corrected, future elections in the United States and beyond will not be secure and citizens will not have confidence in the results.

I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge. Executed this November 23th, 2020.

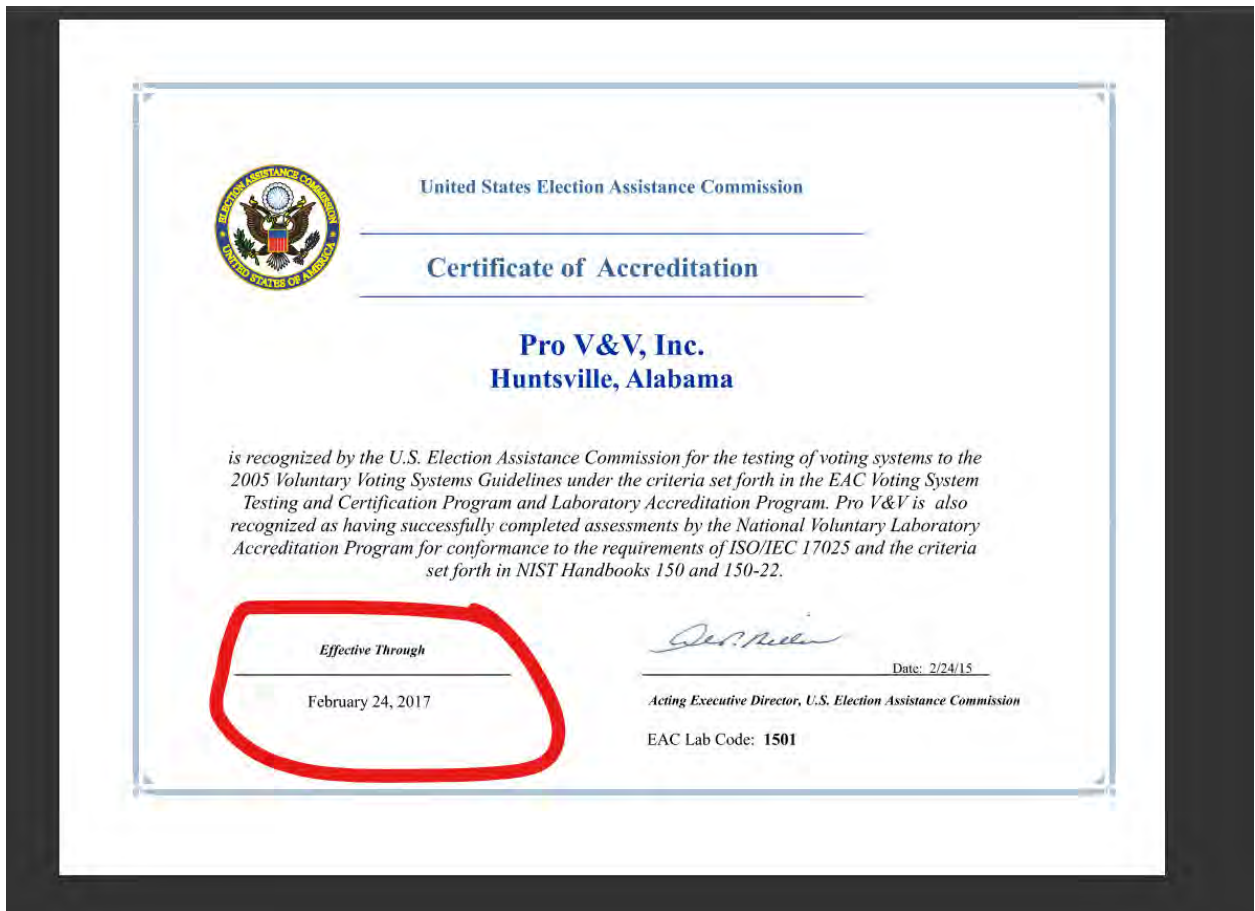


Declaration of [REDACTED]

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

1. I am over the age of 21 years and I am under no legal disability, which would prevent me from giving this declaration.
2. I have been a private contractor with experience gathering and analyzing foreign intelligence and acted as a LOCALIZER during the deployment of projects and operations both OCONUS and CONUS. I am a trained Cryptolinguist, hold a completed degree in Molecular and Cellular Physiology and have FORMAL training in other sciences such as Computational Linguistics, Game Theory, Algorithmic Aspects of Machine Learning, Predictive Analytics among others.
3. I have operational experience in sources and methods of implementing operations during elections both CONUS and OCONUS
4. I am an amateur network tracer and cryptographer and have over two decades of mathematical modeling and pattern analysis.
5. In my position from 1999-2014 I was responsible for delegating implementation via other contractors sub-contracting with US or 9 EYES agencies identifying connectivity, networking and subcontractors that would manage the micro operations.
6. My information is my personal knowledge and ability to detect relationships between the companies and validate that with the cryptographic knowledge I know and attest to as well as evidence of these relationships.
7. In addition, I am WELL versed due to my assignments during my time as a private contractor of how elections OCONUS (for countries I have had an assignment at) and CONUS (well versed in HAVA ACT) and more.
8. On or about October 2017 I had reached out to the US Senate Majority Leader with an affidavit claiming that our elections in 2017 may be null and void due to lack of EAC certifications. In fact Sen. Wyden sent a letter to Jack Cobb on 31 OCT 2017 advising discreetly pointing out the importance of being CERTIFIED EAC had issued a certificate to

Pro V & V and that expired on Feb 24, 2017. No other certification has been located.



9. Section 231(b) of the Help America Vote Act (HAVA) of 2002 (42 U.S.C. §15371(b)) requires that the EAC provide for the accreditation and revocation of accreditation of independent, non-federal laboratories qualified to test voting systems to Federal standards. Generally, the EAC considers for accreditation those laboratories evaluated and recommended by the National Institute of Standards and Technology (NIST) pursuant to HAVA Section 231(b)(1). However, consistent with HAVA Section 231(b)(2)(B), the Commission may also vote to accredit laboratories outside of those recommended by NIST upon publication of an explanation of the reason for any such accreditation.

United States Department of Commerce
National Institute of Standards and Technology



Certificate of Accreditation to ISO/IEC 17025:2017

NVLAP LAB CODE: 200978-0

Pro V&V
Huntsville, AL

*is accredited by the National Voluntary Laboratory Accreditation Program for specific services,
listed on the Scope of Accreditation, for:*

Voting System Testing

*This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017.
This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality
management system (refer to joint ISO-ILAC-IAF Communique dated January 2009).*

2020-03-26 through 2021-03-31
Effective Dates



[Signature]
For the National Voluntary Laboratory Accreditation Program

10.

11. VSTL's are VERY important because equipment vulnerabilities allow for deployment of algorithms and scripts to intercept, alter and adjust voting tallies.
12. There are only TWO accredited VSTLs (VOTING SYSTEM TEST LABORATORIES). In order to meet its statutory requirements under HAVA §15371(b), the EAC has developed the EAC's Voting System Test Laboratory Accreditation Program. The procedural requirements of the program are established in the proposed information collection, the EAC **Voting System Test Laboratory Accreditation Program Manual**. Although participation in the program is voluntary, adherence to the program's procedural requirements is mandatory for participants. The procedural requirements of this Manual will supersede any prior laboratory accreditation requirements issued by the EAC. This manual shall be read in conjunction with the EAC's **Voting System Testing and Certification Program Manual** (OMB 3265-0019).



MICHIGAN

State Participation:

Requires Testing by an Independent Testing Authority. MI requires that voting systems are certified by an independent testing authority accredited by NASED and the board of state canvassers.

Applicable Statute(s):

"An electronic voting system shall not be used in an election unless it is approved by the board of state canvassers ... and unless it meets 1 of the following conditions: (a) Is certified by an independent testing authority accredited by the national association of state election directors and by the board of state canvassers. (b) In the absence of an accredited independent testing authority, is certified by the manufacturer of the voting system as meeting or exceeding the performance and test standards referenced in subdivision (a) in a manner prescribed by the board of state canvassers." [MICH. COMP. LAWS ANN § 168.795a](#) (2009).

Applicable Regulation(s):

MI does not have a regulation regarding the federal certification process.

State Certification Process:

The Secretary of State accepts requests from persons/corporations wishing to have their voting system examined. The requestor must pay the Secretary of State an application fee of \$1,500.00, file a report listing all of the states in which the voting system has been approved and any reports that these states have made regarding the performance of the voting system. The Board of State Canvassers conducts a field test involving Michigan electors and election officials in simulated election day conditions. The Board of State Canvassers shall approve the voting system if it meets all of the state requirements. [MICH. COMP. LAWS ANN § 168.795a](#) (2009).

Fielded Voting Systems:

[After the EAC completes and issues the 2008 Election Administration and Voting Survey, information about fielded voting systems will be added to this document. In the meantime, readers may find information on the voting systems at the following website (if available)].
http://www.michigan.gov/sos/0,1607,7-127-1633_8716_45458---,00.html



WISCONSIN

| | |
|-------------------------------------|---|
| <i>State Participation:</i> | Requires Testing by a Federally Accredited Laboratory. WI requires that its voting systems receive approval from an independent testing authority accredited by NASED verifying that the voting systems meet all of the recommended FEC standards. |
| <i>Applicable Statute(s):</i> | "No ballot, voting device, automatic tabulating equipment or relating equipment and materials to be used in an electronic voting system may be utilized in this state unless it is approved by the board [of election commissioners]." WIS. STAT. ANN. § 5.91 (West 2009). |
| <i>Applicable Regulation(s):</i> | "An application for approval of an electronic voting system shall be accompanied by all of the following ... [r]eports from an independent testing authority accredited by the national association of state election directors (NASED) demonstrating that the voting system conforms to all the standards recommended by the federal elections commission." WIS. ADMIN. CODE GAB § 7.01 (2009). |
| <i>State Certification Process:</i> | The Board of Election Commissioners accepts applications for the approval of electronic voting systems. Once the application is completed, the vendor must set up the voting system for three mock elections using: (1) offices, (2) referendum questions and (3) candidates. A panel of local election officials can assist the Board in the review of the voting system. The Board conducts the test using a mock election for the partisan primary, general election, and nonpartisan election. The Board may also require that the voting system be used in an actual election as a condition of the approval. WIS. ADMIN. CODE GAB §§ 7.01, 7.02 (2009). |
| <i>Fielded Voting Systems:</i> | <i>[After the EAC completes and issues the 2008 Election Administration and Voting Survey, information about fielded voting systems will be added to this document. In the meantime, readers may find information on the voting systems at the following website (if available)].</i> http://elections.state.wi.us/section.asp?linkid=643&locid=47 |



GEORGIA

State Participation:

Requires Federal Certification. GA requires that its voting systems are tested to EAC standards by EAC accredited labs and certified by the EAC.

Applicable Statute(s):

"Any person or organization owning, manufacturing, or selling, or being interested in the manufacture or sale of, any voting machine may request the Secretary of State to examine the machine. Any ten or more electors of this state may, at any time, request the Secretary of State to reexamine any voting machine previously examined and approved by him or her. Before any such examination or reexamination, the person, persons, or organization requesting such examination or reexamination shall pay to the Secretary of State the reasonable expenses of such examination; provided, however, that in the case of a request by ten or more electors the examination fee shall be \$ 250.00. The Secretary of State may, at any time, in his or her discretion, reexamine any voting machine." [GA CODE ANN. § 21-2-324](#) (2008).

Applicable Regulation(s):

"Prior to submitting a voting system for certification by the State of Georgia, the proposed voting system's hardware, firmware, and software must have been issued Qualification Certificates from the EAC. These EAC Qualification Certificates must indicate that the proposed voting system has successfully completed the EAC Qualification testing administered by EAC approved ITAs. If for any reason, this level of testing is not available, the Qualification tests shall be conducted by an agency designated by the Secretary of State. In either event, the Qualification tests shall comply with the specifications of the *Voting Systems Standards* published by the EAC." [GA. COMP. R. & RES. 590-8-1-.01](#) (2009).

State Certification Process:

After the voting system has passed EAC Qualification testing, the vendor of the voting system submits a letter to the Office of the Secretary of State requesting certification for the voting system along with a technical data package to the certification agent. An evaluation proposal is created by the certification agent after a preliminary view of the Technical Data Package and sent to the vendor. Any additional EAC ITA testing identified in the evaluation proposal is arranged by the vendor and the certification agent will perform all other tests identified in the evaluation proposal. The certification agent submits a report of their findings to the Secretary of State. Based on these findings the Secretary of State will make a final determination on whether to certify the voting system. [GA. COMP. R. & RES. 590-8-1-.01](#) (2009).

Fielded Voting Systems:

[After the EAC completes and issues the 2008 Election Administration and Voting Survey, information about fielded voting systems will be added to this document. In the meantime, readers may find information on the voting systems at the following website (if available)].
<http://www.sos.georgia.gov/Elections/>



PENNSYLVANIA

State Participation:

Requires Testing by a Federally Accredited Laboratory. PA requires that its voting systems are approved by a federally recognized independent testing laboratory as meeting federal voting system standards.

Applicable Statute(s):

"Any person or corporation owning, manufacturing or selling, or being interested in the manufacture or sale of, any electronic voting system, may request the Secretary of the Commonwealth to examine such system if the voting system has been examined and approved by a federally recognized independent testing authority and if it meets any voting system performance and test standards established by the Federal Government." 25 PA. CONS. STAT. ANN. Code § 3031.5 (West 2008).

Applicable Regulation(s):

PA does not have a regulation regarding the federal certification process.

State Certification Process:

The Secretary of State examines voting systems, upon request, once the voting systems have received approval by a federally recognized independent testing authority. The person(s) requesting the examination of the voting system are responsible for the cost of the examination. After the examination, the Secretary of State issues a report stating whether or not the voting systems are safe and compliant with state and federal requirements. If the voting systems are deemed safe and compliant by the Secretary of State then the systems may be adopted and approved for use in elections by each county through a majority vote of its qualified electors. 25 PA. CONS. STAT. ANN. Code §§ 3031.5, 3031.2 (West 2008).

Fielded Voting Systems:

[After the EAC completes and issues the 2008 Election Administration and Voting Survey, information about fielded voting systems will be added to this document. In the meantime, readers may find information on the voting systems at the following website (if available)].
<http://www.votespa.com/HowtoVote/tabid/74/language/en-US/Default.aspx>



ARIZONA

State Participation:

Requires Testing by a Federally Accredited Laboratory. AZ requires that its voting systems are HAVA compliant and approved by a laboratory that is accredited pursuant to HAVA.

Applicable Statute(s):

"On completion of acquisition of machines or devices that comply with HAVA, machines or devices used at any election for federal, state or county offices may only be certified for use in this state and may only be used in this state if they comply with HAVA and if those machines or devices have been tested and approved by a laboratory that is accredited pursuant to HAVA." [ARIZ. REV. STAT. § 16-442\(B\)](#) (2008).

Applicable Regulation(s):

AZ does not have a regulation regarding the federal certification process.

State Certification Process:

The Secretary of State appoints a committee of three people that test different voting systems. This committee is required to submit their recommendations to the Secretary of State who then makes the final decision on which voting system(s) to adopt. [ARIZ. REV. STAT. § 16-442\(A\) and \(C\)](#) (2008).

Fielded Voting Systems:

[After the EAC completes and issues the 2008 Election Administration and Voting Survey, information about fielded voting systems will be added to this document. In the meantime, readers may find information on the voting systems at the following website (if available)].
<http://www.azsos.gov/election/equipment/default.htm>

17.

18. **Pro V& V** and **SLI Gaming** both lack evidence of EAC Accreditation as per the Voting System Testing and Certification Manual.

19. **Pro V& V** is owned and Operated by Jack Cobb. Real name is Ryan Jackson Cobb. The company ProV&V was founded and run by Jack Cobb who formerly worked under the entity of Wyle Laboratories which is an AEROSPACE DEFENSE CONTRACTING ENTITY. The address information on the EAC, NIST and other entities for Pro V& V are different than that of what is on ProV&V website. The [EAC](#) and NIST (ISO CERT) issuers all have another address.

The image shows two screenshots of the Pro V&V website. The top screenshot is a browser view of the 'Accredited Labs' page on the URL <https://eac-legacy.ae-admin.com/voting-equipment/voting-system-test-laboratories-vsl/>. It features a search bar with 'SEARCH' and 'CLEAR' buttons. Below the search bar, it says '2 results found, Page 1 of 1'. The first result is for 'Pro V&V' located at 700 Boulevard South, Suite 102, Huntsville, AL 35802. The status is 'Accredited', the program manager is Jack Cobb, President, and the phone is 256-713-1111. The second result is for 'SLI Compliance, a Division of Gaming Laboratories International, LLC' located at 4720 Independence Street, Wheat Ridge, CO 80033. The status is 'Accredited', the program manager is Traci Mapps, Director of Operations, and the phone is 303-422-1566. To the right of the search results are sections for 'Frequently Asked Questions', 'Manuals and Forms', 'Test and Certification Blogs', 'DO YOU HAVE QUESTIONS?' with a 'Contact Us' button, and 'REGISTER TO VOTE!' with a 'Register Today' button.

The bottom screenshot is a browser view of the contact form on the URL www.provandv.com/contact/. It is titled 'Pro V&V' and lists the address: 6705 Odyssey Drive NW, Suite C, Huntsville, AL 35806. The office phone is 256-713-1111 and the fax is 256-713-1112. The form includes fields for 'Your Name (required)', 'Your Email (required)', 'Subject', and 'Your Message'. A 'Send' button is at the bottom right of the form. The footer of the page says '© 2020 Pro V&V, Inc. All rights reserved.' and 'Theme by Juzzaract'.

20. VSTLs are the most important component of the election machines as they examine the use of COTS (Commercial Off-The-Shelf)
21. “Wyle became involved with the testing of electronic voting systems in the early 1990’s and has tested over 150 separate voting systems. Wyle was the first company to obtain accreditation by the National Association of State Election Directors (NASD). Wyle is accredited by the Election Assistance Commission (EAC) as a Voting System Testing Laboratory (VSTL). Our scope of accreditation as a VSTL encompasses all aspects of the hardware and software of a voting machine. Wyle also received NVLAP accreditation to ISO/IEC 17025:2005 from NIST.” [Testimony](#) of Jack Cobb 2009
22. COTS are preferred by many because they have been tried and tested in the open market and are most economic and readily available. COTS are also the SOURCE of vulnerability therefore VSTLs are VERY important. COTS components by voting system machine manufacturers can be used as a “Black Box” and changes to their specs and hardware make up change continuously. Some changes can be simple upgrades to make them more efficient in operation, cost efficient for production, end of life (EOL) and even complete reworks to meet new standards. The key issue in this is that MOST of the COTS used by Election Machine Vendors like Dominion, ES&S, Hart Intercivic, Smartmatic and others is that such manufacturing for COTS have been outsourced to China which if implemented in our Election Machines make us vulnerable to BLACK BOX antics and backdoors due to hardware changes that can go undetected. This is why VSTL’s are VERY important.
23. The proprietary voting system software is done so and created with cost efficiency in mind and therefore relies on 3rd party software that is AVAILABLE and HOUSED on the HARDWARE. This is a vulnerability. Exporting system reporting using software like Crystal Reports, or PDF software allows for vulnerabilities with their constant updates.
24. As per the COTS hardware components that are fixed, and origin may be cloaked under proprietary information a major vulnerability exists since once again third-party support software is dynamic and requires FREQUENT updates. The hardware components of the computer components, and election machines that are COTS may have slight updates that can be overlooked as they may be like those designed that support the other third -party software. COTS origin is important and the US Intelligence Community report in 2018 verifies that.
25. The Trump Administration made it clear that there is an absence of a major U.S. alternative to foreign suppliers of networking equipment. This highlights the growing dominance of

Chinese manufacturers like Huawei that are the world's LARGEST supplier of telecom and other equipment that endangers national security.

26. China, is not the only nation involved in COTS provided to election machines or the networking but so is Germany via a LAOS founded Chinese linked cloud service company that works with SCYTL named Akamai Technologies that have offices in China and are linked to the server that Dominion Software.

28 046 Madrid

Asian offices

Akamai Technologies - India

111, Brigade Court
Koramangala Industrial Area
Bangalore 560 095, India

Telephone: 91-80-575-99222
Fax: 91-80-575-99209
Regional Manager: Stuart Spiteri

Akamai Technologies - China

Suite 1560, 15th Floor
NCI Tower
12A Jianguomenwai Avenue
Chaoyang District,
Beijing 100022
China

Telephone: 86-10-8523-3097
Fax: 86-10-8523-3001
Regional Manager: Stuart Spiteri

Akamai Japan K.K.

The Executive Centre Japan K.K.
15F Tokyo Ginko Kyokai building
1-3-1 Marunouchi, Chiyoda-ku, Tokyo 100-0005

Telephone: 81-3-3216-7200 (Centre)
81-3-3216-7300 (Akamai direct)
Fax: 81-3-3216-7390 (Centre)
Regional Manager: Stuart Spiteri

Akamai Technologies - Singapore

Akamai, Regus Centre, 36-01 UOB Plaza 1
80 Raffles Place
Singapore 048624
[Driving directions](#)

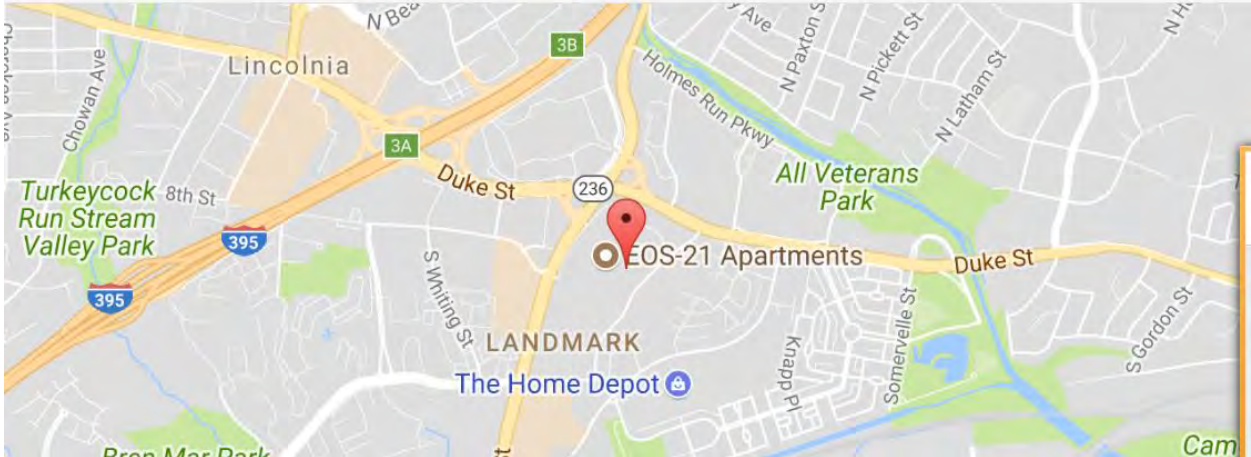
Telephone: +65 6248 4614
Fax: +65 6248-4501
Regional Manager: Stuart Spiteri

Akamai Technologies - Australia and New Zealand

201 Sussex St
Tower 2, Level 20
Sydney, NSW 2000, Australia
info@au.akamai.com

Telephone: 61 2 9006 1325
Fax: 61 2 9475 0343
Regional Manager: Stuart Spiteri

ptt.gov resolves to 4.30.228.74. According to our data this IP address belongs to *Level 3 Communications* and is located in *Alexandria, Virginia, United States*. Please have a look at the information provided below for further details.

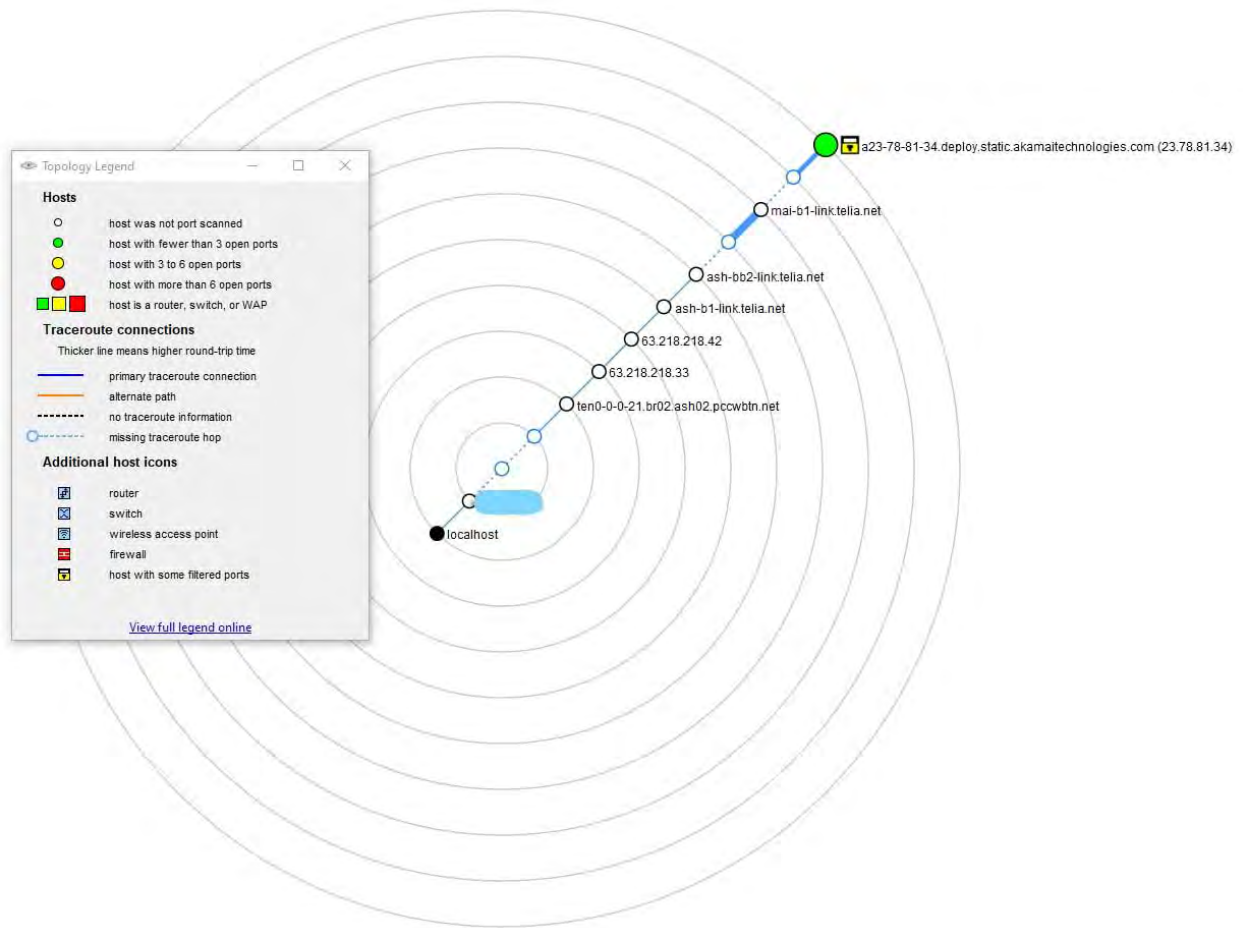
| | |
|---|--|
| 🇺🇸 4.30.228.74 | |
| ISP/Organization | Level 3 Communications |
| Location | Alexandria 22304, Virginia (VA), 🇺🇸 United States (US) |
| Latitude | 38.8115 / 38°48'41" N |
| Longitude | -77.1285 / 77°7'42" W |
| Timezone | America/New_York |
| Local Time | Thu, 12 Jul 2018 19:27:40 -0400 |
|  | |

27.

28. L3 Level Communications is federal contractor that is partially owned by foreign lobbyist George Soros. An article that AP ran in 2010 – spoke out about the controversy of this that has been removed. ([LINK](#)) “As for the company’s other political connections, it also appears that none other than George Soros, the billionaire funder of the country’s liberal political infrastructure, owns 11,300 shares of OSI Systems Inc., the company that owns Rapiscan. Not surprisingly, OSI’s stock has appreciated considerably over the course of the year. Soros certainly is a savvy investor.” Washington Examiner re-write.



29.



30.

31. **L-3 Communication Systems-East** designs, develops, produces and integrates communication systems and support equipment for space, air, ground, and naval applications, including C4I systems and products; integrated Navy communication systems; integrated space communications and RF payloads; recording systems; secure communications, and information security systems. In addition, their site claims that MARCOM is an integrated communications system and The Marcom® is the foundation of the Navy's newest digital integrated voice / data switching system for affordable command and control equipment supporting communications and radio room automation. The MarCom® uses the latest **COTS** digital technology and open systems standards to offer the command and control user a low cost, user friendly, solution to the complex voice, video and data communications needs of present and future joint / allied missions. Built in reliability, rugged construction, and fail-safe circuits ensure your call and messages will go through. Evidently a HUGE vulnerability.

32. Michigan's government site is thumped off Akamai Technologies servers which are housed on **TELIA AB** a foreign server located in Germany.
33. Scytl, who is contracted with AP that receives the results tallied BY Scytl on behalf of Dominion – During the elections the AP reporting site had a disclaimer.
AP – powered by SCYTL.

| Advertisements | Basic Tracking Info |
|-----------------------|---|
| | Domain: Michigan.gov [Whois Lookup - Domain Country - Domain To IP] |
| | IP Address: 23.78.81.34 [IP Blacklist Check] |
| | Reverse DNS: 34.81.78.23.in-addr.arpa |
| | Hostname: a23-78-81-34.deploy.static.akamaitechnologies.com a12-67.akam.net >> 184.26.160.67 a11-66.akam.net >> 84.53.139.66 a1-35.akam.net >> 193.108.91.35 |
| | Nameservers: a5-66.akam.net >> 95.100.168.66 a18-64.akam.net >> 95.101.36.64 a24-65.akam.net >> 2.16.130.65 |
| | Location For an IP: Michigan.gov |
| | Continent: North America (NA) |
| | Country: United States  (US) |
| | Capital: Washington |
| | State: Unknown |
| | City: Unknown |
| | Location: Unknown |
| | ISP: Akamai Technologies |
| | Organization: Akamai Technologies |
| | AS Number: AS1299 Telia Company AB |
| | something went wrong! something went wrong! |
| Geolocation on IP Map | Time Zone: America/North_Dakota/Center |
| | Local Time: 13:48:46 |
| | Timezone: -21600 |
| | GMT offset: 07:27 / 17:12 |
| | Sunrise / Sunset: |
| | Extra Information for an IP: Michigan.gov |
| | Continent: 46.07305 / -100.546 |
| | Lat/Lon: 38 / -98 |
| | Country: 38 / -98 |
| | Lat/Lon: (37.751) / (-97.822) |
| | City Lat/Lon: (37.751) / (-97.822) |
| | IP Language: English |

34. “Scytl was selected by the Federal Voting Assistance Program of the U.S. Department of Defense to provide a secure online ballot delivery and onscreen marking systems under a program to support overseas military and civilian voters for the 2010 election cycle and beyond. Scytl was awarded 9 of the 20 States that agreed to participate in the program (New York, Washington, Missouri, Nebraska, Kansas, New Mexico, South Carolina, Mississippi and Indiana), making it the provider with the highest number of participating States.” [PDF](#)
35. According to DOMINION : 1.4.1 Software and Firmware The software and firmware employed by Dominion D-Suite 5.5-A consists of 2 types, custom and commercial off the shelf (COTS). COTS applications were verified to be pristine or were subjected to source code review for analysis of any modifications and verification of meeting the pertinent standards.
36. The concern is the HARDWARE and the NON – ACCREDITED VSTLs as by their own admittance use COTS.
37. The purpose of VSTL’s being accredited and their importance in ensuring that there is no foreign interference/ bad actors accessing the tally data via backdoors in equipment software. The core software used by ALL SCYTL related Election Machine/Software manufacturers ensures “anonymity” .
38. Algorithms within the area of this “shuffling” to maintain anonymity allows for setting values to achieve a desired goal under the guise of “encryption” in the trap-door.
39. The actual use of trapdoor commitments in Bayer-Groth proofs demonstrate the implications for the verifiability factor. This means that no one can SEE what is going on during the process of the “shuffling” therefore even if you deploy an algorithms or manual scripts to fractionalize or distribute pooled votes to achieve the outcome you wish – you cannot prove they are doing it! See STUDY : “[The use of trapdoor commitments in Bayer-Groth proofs and the implications for the verifiability of the Scytl-SwissPost Internet voting system](#)”
40. **Key Terms**
41. **UNIVERSAL VERIFIABILITY:** Votes cast are the votes counted and integrity of the vote is verifiable (the vote was tallied for the candidate selected) . **SCYTL FAILS UNIVERSAL VERIFIABILITY** because no mathematical proofs can determine if any votes have been manipulated.
42. **INDIVIDUAL VERIFIABILITY:** Voter cannot verify if their ballot got correctly counted. Like, if they cast a vote for ABC they want to verify it was ABC. That notion clearly discounts the need for anonymity in the first place.

43. To understand what I observed during the 2020 I will walk you through the process of one ballot cast by a voter.
44. STEP 1 |Config Data | All non e-voting data is sent to Scytel (offshore) for configuration of data. All e-voting is sent to CONFIGURATION OF DATA then back to the e-voting machine and then to the next phase called CLEANSING. **CONCERNS:** Here we see an “OR PROOF” as coined by mathematicians – an “or proof” is that votes that have been pre-tallied parked in the system and the algorithm then goes back to set the outcome it is set for and seeks to make adjustments if there is a partial pivot present causing it to fail demanding manual changes such as block allocation and narrowing of parameters or self-adjusts to ensure the predetermined outcome is achieved.
45. STEP 2|CLEANSING | The Process is when all the votes come in from the software run by Dominion and get “cleansed” and put into 2 categories: invalid votes and valid votes.
46. STEP 3|Shuffling /Mixing | This step is the most nefarious and exactly where the issues arise and carry over into the decryption phase. Simply put, the software takes all the votes, literally mixes them a and then re-encrypts them. This is where if ONE had the commitment key- TRAPDOOR KEY – one would be able to see the parameters of the algorithm deployed as the votes go into this mixing phase, and how algorithm redistributes the votes.
47. This published PAPER FROM University College London depicts how this shuffle works. In essence, when this mixing/shuffling occurs, then one doesn’t have the ability to know that vote coming out on the other end is actually their vote; therefore, ZERO integrity of the votes when mixed.

48.

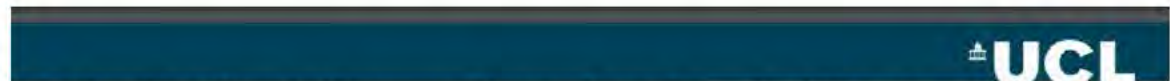
Background - ElGamal encryption

- Setup: Group \mathcal{G} of prime order q with generator g
- Public key: $pk = y = g^x$
- Encryption: $\mathcal{E}_{pk}(m; r) = (g^r, y^r m)$
- Decryption: $\mathcal{D}_x(u, v) = vu^{-x}$
- Homomorphic:

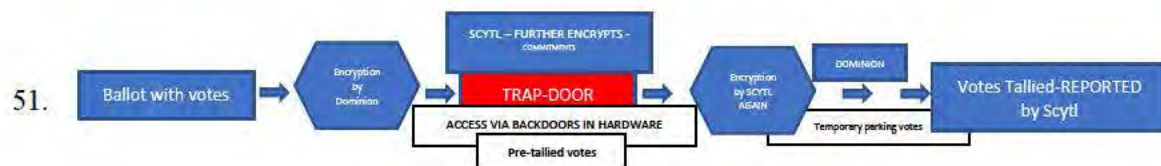
$$\mathcal{E}_{pk}(m; r) \times \mathcal{E}_{pk}(M; R) = \mathcal{E}_{pk}(mM; r + R)$$

- Re-encryption:

$$\mathcal{E}_{pk}(m; r) \times \mathcal{E}_{pk}(1; R) = \mathcal{E}_{pk}(m; r + R)$$



49. When this mixing/shuffling occurs, then one doesn't have the ability to know that vote coming out on the other end is actually their vote; therefore, ZERO integrity of the votes.
50. When the votes are sent to Scytel via Dominion Software EMS (Election Management System) the Trap Door is accessed by Scytel or TRAP DOOR keys (Commitment Parameters).



52. The encrypted data is shifted into Scytel's platform in the form of ciphertexts – this means it is encrypted and a key based on commitments is needed to read the data. The ballot data can only be read if the person has a key that is set on commitments.
53. A false sense of security is provided to both parties that votes are not being “REPLACED” during the mixing phase. Basically, Scytel re-encrypts the ballot data that comes in from Dominion (or any other voting software company) as ciphertexts. Scytel is supposed to prove that votes A, B, C are indeed X, Y, Z under their new re-encryption when sending back the votes that are tallied coding them respectively. This is done by Scytel and the Election Software company that agrees to certain

“Generators” and therefore together build “commitments.”

```
public CommitmentParams(final ZpSubgroup group, final int n) {
    group = group;
    h = GroupTools.getRandomElement(group);
    commitmentlength = n;
    g = GroupTools.getVectorRandomElement(group,
    this.commitmentlength);
}

// from getRandomElement(group)
Exponent randomExponent = ExponentTools.getRandomExponent(group.getQ());
return group.getGenerator().exponentiate(randomExponent);
```

54. Scytl and Dominion have an agreement – only the two would know the parameters. This means that access is able to occur through backdoors in hardware if the parameters of the commitments are known in order to alter the range of the algorithm deployed to satisfy the outcome sought in the case of algorithm failure.
55. Trapdoor is a cryptotech term that describes a state of a program that knows the commitment parameters and therefore is able change the value of the commitments however it likes. In other words, Scytl or anyone that knows the commitment parameters can take all the votes and give them to any one they want. If they have a total of 1000 votes an algorithm can distribute them among all races as it deems necessary to achieve the goals it wants. (Case Study: Estonia)

Commitment_{CRYPT} = CM_C

Saytl sets commitment - simple math ↓

$$CM_c(\vec{a}; r) = H \left(\prod_{i=1}^n a_i \right) = 1 \cdot G_i^{a_i}$$

$$CM_c(\vec{a}; r) = H \left(r + \sum_{i=1}^n (a_i - z_i) e_i \right) \prod_{i=1}^n H^{z_i e_i}$$

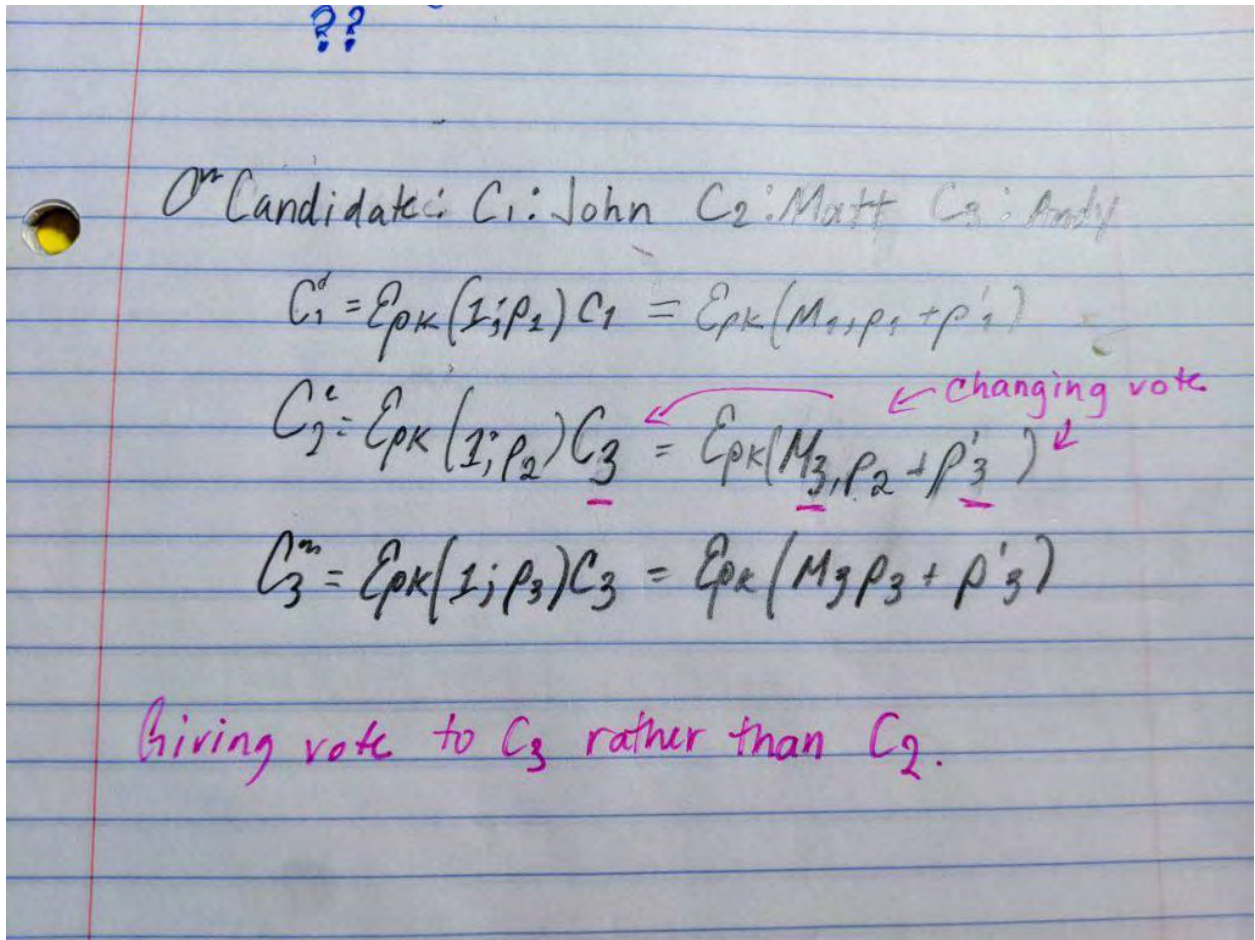
$$CM_c(\vec{a}; r) = CM_c(\vec{z}; r')$$

$$r' = r + \sum_{i=1}^n e_i (a_i - z_i)$$

56.

57. Within the trapdoor this is how the algorithm behaves to move the goal posts in elections without being detected by this proof . During the mixing phase this is the algorithm you would use to

“reallocate” votes via an algorithm to achieve the goal set.

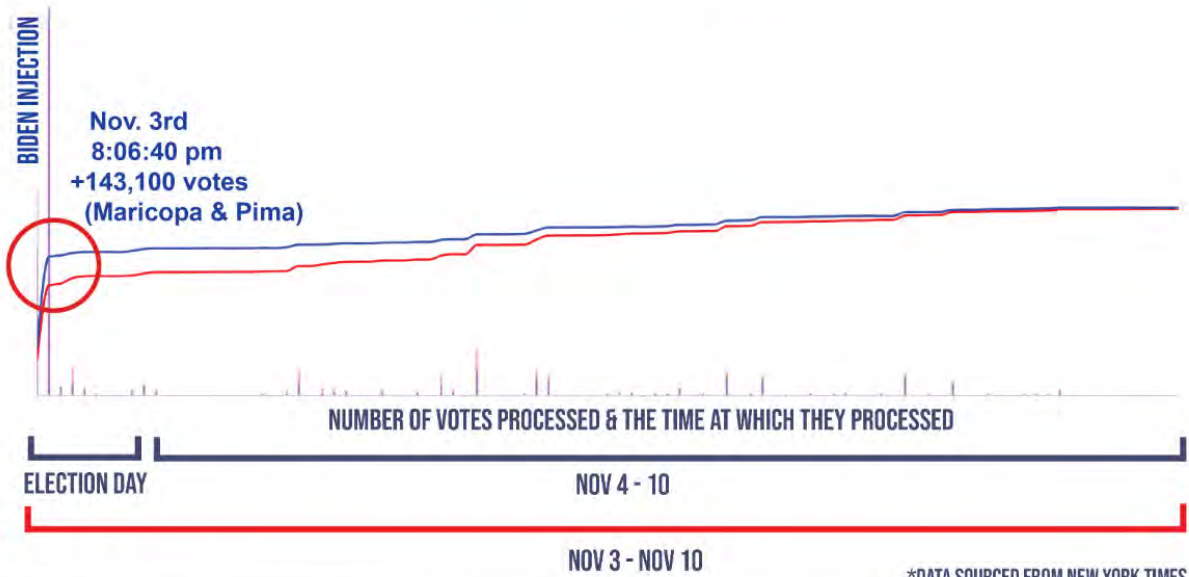


58. STEP 4|Decryption would be the decryption phase and temporary parking of vote tallies before reporting. In this final phase before public release the tallies are released from encrypted format into plain text. As previously explained, those that know the trapdoor can easily change any votes that the randomness is applied and used to generate the tally vote ciphertext. Thus in this case, Scytl who is the mixer can collude with their vote company clients or an agency (-----) to change votes and get away with it. This is because the receiver doesn't have the decryption key so they rely solely on Scytl to be **honest** or free from any foreign actors within their backdoor or the Election Company (like Dominion) that can have access to the key.
59. In fact, a study from the University of Bristol made claim that interference can be seen when there is a GREAT DELAY in reporting and finalizing numbers University of Bristol : [How not to Prove Yourself: Pitfalls of the Fiat-Shamir Heuristic and Applications to Helios](#)
60. “Zero-knowledge proofs of knowledge allow a prover to convince a verifier that she holds information satisfying some desirable properties without revealing anything else.” David Bernhard, Olivier Pereira, and Bogdan Warinschi.

61. Hence, you can't prove anyone manipulated anything. The TRAP DOOR KEY HOLDERS can offer you enough to verify to you what you need to see without revealing anything and once again indicating the inability to detect manipulation. **ZERO PROOF of INTEGRITY OF THE VOTE.**
62. Therefore, if decryption is challenged, the administrator or software company that knows the trap door key can provide you proof that would be able to pass verification (blind). This was proven to be factually true in the case study by The University of Melbourne in March. White Hat Hackers purposely altered votes by knowing the parameters set in the commitments and there was no way to prove they did it – or any way to prove they didn't.
63. IT'S THE PERFECT THREE CARD MONTY. That's just how perfect it is. They fake a proof of ciphertexts with KNOWN "RANDOMNESS". This rolls back to the integrity of the VOTE. The vote is not safe using these machines not only because of the method used for ballot "cleansing" to maintain anonymity but the EXPOSURE to foreign interference and possible domestic bad actors.
64. In many circumstances, manipulation of the algorithm is NOT possible in an undetectable fashion. This is because it is one point heavy. Observing the elections in 2020 confirm the deployment of an algorithm due to the BEHAVIOR which is indicative of an algorithm in play that had no pivoting parameters applied.
65. The behavior of the algorithm is that one point (B) is the greatest point within the allocated set. It is the greatest number within the A B points given. Point A would be the smallest. Any points outside the A B points are not necessarily factored in yet can still be applied.
66. The points outside the parameters can be utilized to a certain degree such as in block allocation.
67. The algorithm geographically changed the parameters of the algorithm to force blue votes and ostracize red.
68. Post block allocation of votes the two points of the algorithm were narrowed ensuring a BIDEN win hence the observation of NO Trump Votes and some BIDEN votes for a period of time.

ARIZONA

"FIXING" THE VOTE

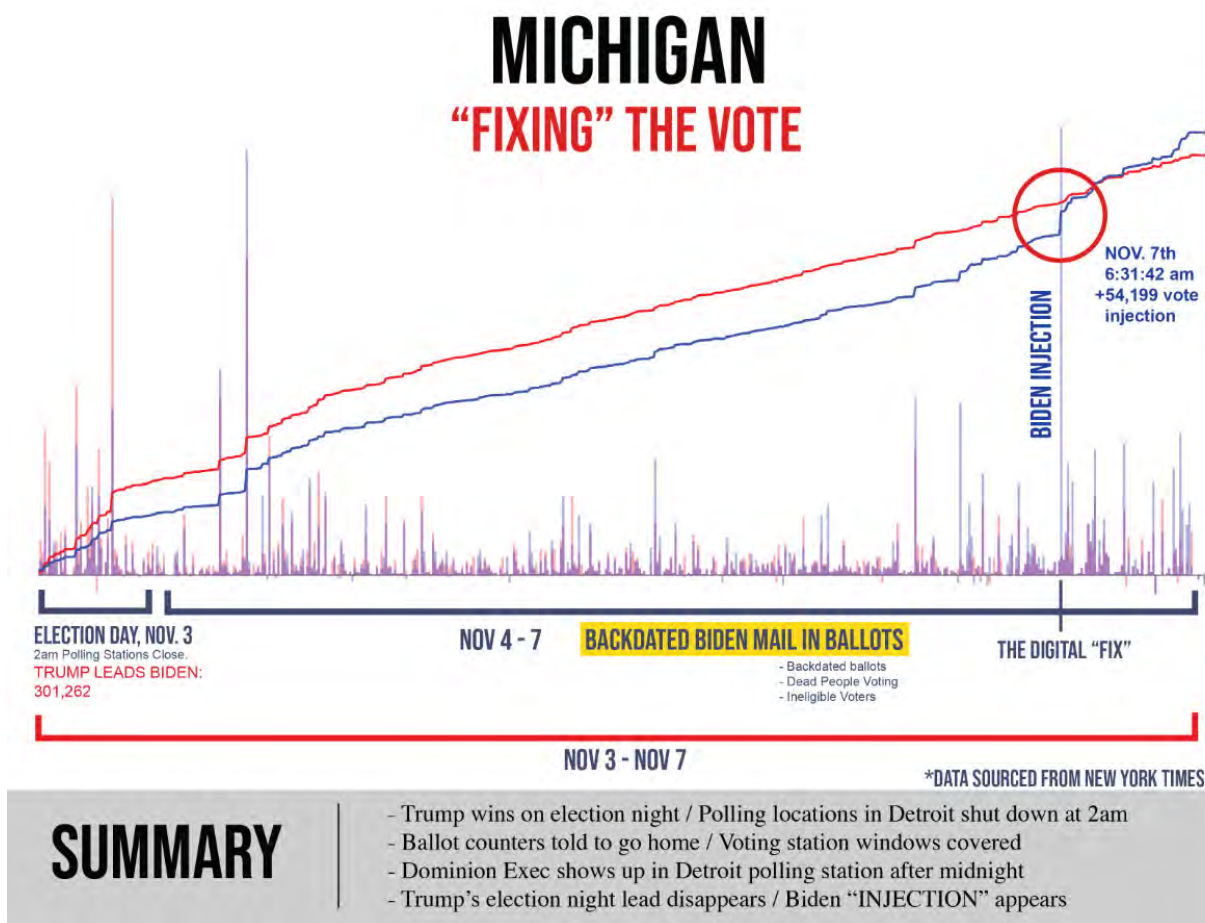


SUMMARY

- Mathematical evidence of the seeding "injection" of votes at the beginning
- A spike means that a large number of votes were injected into the totals
- A normal vote pattern would look like a natural progression – smooth without extreme jumps

69.

70. Gaussian Elimination without pivoting explains how the algorithm would behave and the election results and data from Michigan confirm FAILURE of algorithm.



71. The "Digital Fix" observed with an increased spike in VOTES for Joe Biden can be determined as evidence of a pivot. Normally it would be assumed that the algorithm had a Complete Pivot. Wilkinson's demonstrated the guarantee as :

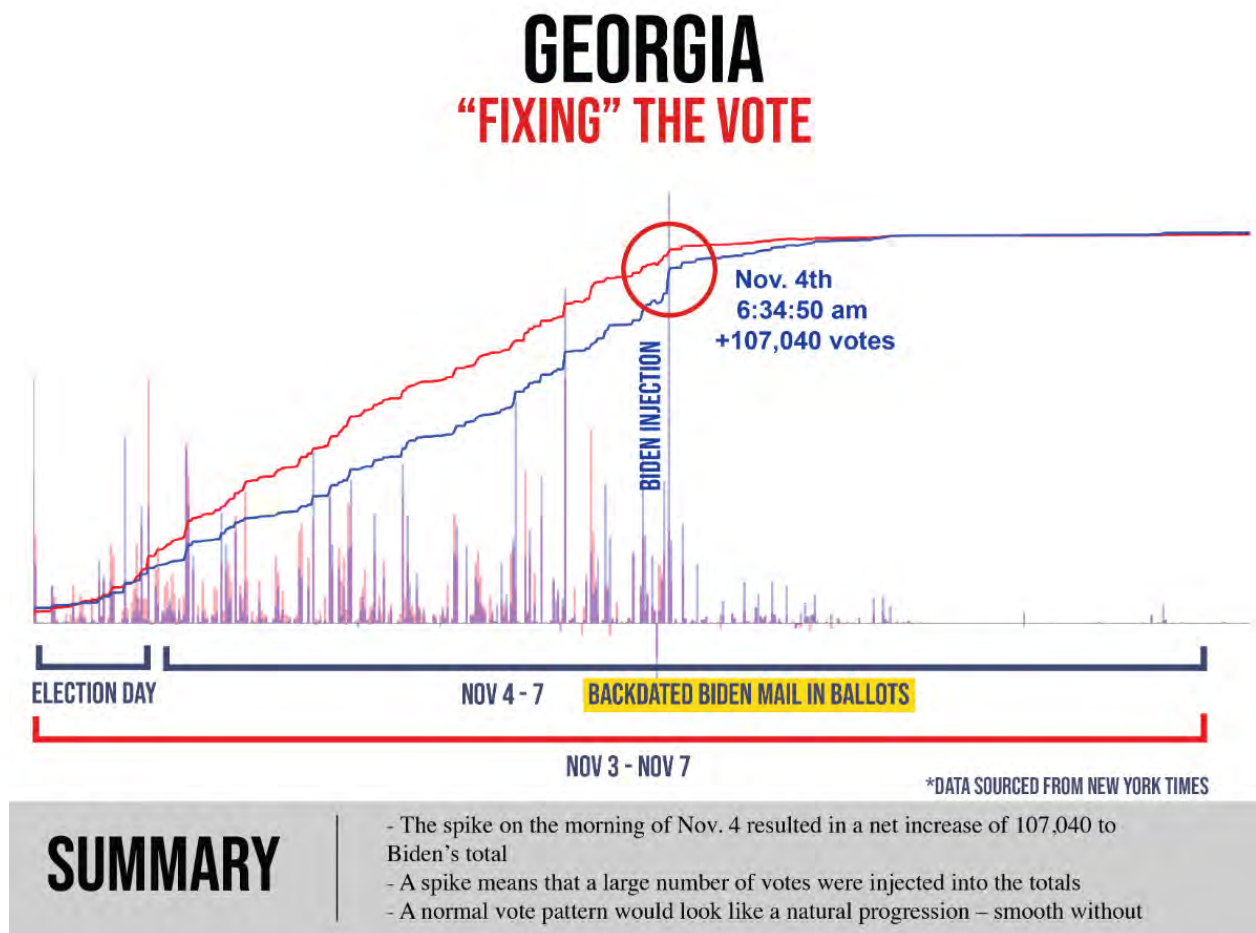
$$\frac{\|U\|_{\infty}}{\|A\|_{\infty}} \leq n^{\frac{1}{2} \log(n)}$$

72.

73. Such a conjecture allows the growth factor the ability to be upper bound by values closer to n . Therefore, complete pivoting can't be observed because there would be too many floating points. Nor can partial as the partial pivoting would overwhelm after the "injection" of votes. Therefore, external factors were used which is evident from the "DIGITAL FIX"
74. Observing the elections, after a review of Michigan's data a spike of 54,199 votes to Biden. Because it is pushing and pulling and keeping a short distance between the 2 candidates; but then a spike, which is how an algorithm presents; - and this spike means there was a pause and an insert was made, where they insert an algorithm. Block spikes in votes for JOE BIDEN were NOT paper

ballots being fed or THUMB DRIVES. The algorithm block adjusted itself and the PEOPLE were creating the evidence to BACK UP the block allocation.

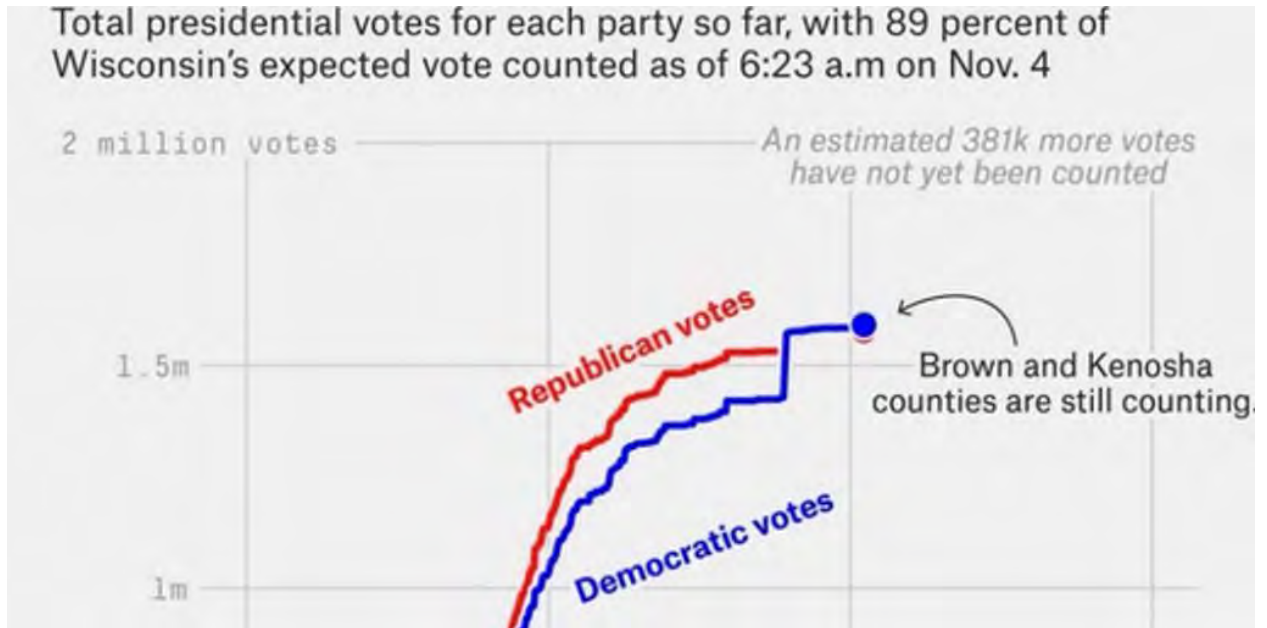
75. I have witnessed the same behavior of the election software in countries outside of the United States and within the United States. In -----, the elections conducted behaved in the same manner by allocating BLOCK votes to the candidate “chosen” to win.
76. Observing the data of the contested states (and others) the algorithm deployed is identical to that which was deployed in 2012 providing Barack Hussein Obama a block allocation to win the 2012 Presidential Elections.
77. The algorithm looks to have been set to give Joe Biden a 52% win even with an initial 50K+ vote block allocation was provided initially as tallying began (as in case of Arizona too). In the am of November 4, 2020 the algorithm stopped working, therefore another “block allocation” to remedy the failure of the algorithm. This was done manually as ALL the SYSTEMS shut down NATIONWIDE to avoid detection.



- 78.
79. In Georgia during the 2016 Presidential Elections a failed attempt to deploy the scripts to block allocate votes from a centralized location where the “trap-door” key lay an attempt by someone using

the DHS servers was detected by the state of GA. The GA leadership assumed that it was “Russians” but later they found out that the IP address was that of DHS.

80. In the state of Wisconsin, we observed a considerable BLOCK vote allocation by the algorithm at the SAME TIME it happened across the nation. All systems shut down at around the same time.



81.

82. In Wisconsin there are also irregularities in respect to BALLOT requests. (names AND address Hidden for privacy)

| F | G | H | V | W | X | Y | AB | AC | AD | AG | AH | AI | AJ | AK | AL | AM |
|--------|------------|----------|--------------|------------|--------------------|------------|----------------------------|----------------|----------|--------------------------|-----------------|------------|------------|----|----|----|
| Active | Registered | Military | Brown County | 11/01/2020 | Online | Military | | Official | Active | Not Returned | Online | 11/01/2020 | | | | |
| Active | Registered | Regular | Brown County | 10/23/2020 | Voted in Person | Regular | | Official | Active | Returned | Voted in Person | 10/23/2020 | 10/23/2020 | | | |
| Active | Registered | Military | Brown County | 11/01/2020 | Online | Military | | Official | Active | Not Returned | Online | 11/01/2020 | | | | |
| Active | Registered | Regular | Brown County | 11/01/2020 | Online | | | | | | | | | | | |
| Active | Registered | Regular | Brown County | 11/01/2020 | Email | Regular | | Official | Active | Returned | Mail | 10/31/2020 | 11/02/2020 | | | |
| Active | Registered | Regular | Brown County | 11/01/2020 | Email | Regular | | Official | Active | Returned | Mail | 10/31/2020 | 11/02/2020 | | | |
| Active | Registered | Regular | Brown County | 11/02/2020 | Voted in Person | Regular | | Official | Active | Returned | Voted in Person | 11/02/2020 | 11/02/2020 | | | |
| Active | Registered | Regular | Brown County | 11/02/2020 | Voted in Person | Regular | | Official | Active | Returned | Voted in Person | 11/02/2020 | 11/02/2020 | | | |
| Active | Registered | Regular | Brown County | 11/02/2020 | Voted in Person | Regular | | Official | Active | Returned | Voted in Person | 11/02/2020 | 11/02/2020 | | | |
| Active | Registered | Regular | Brown County | 11/02/2020 | Voted in Person | Regular | | Official | Active | Returned | Voted in Person | 11/02/2020 | 11/02/2020 | | | |
| Active | Registered | Regular | Brown County | 11/02/2020 | Voted in Person | Regular | | Official | Active | Returned | Voted in Person | 11/02/2020 | 11/02/2020 | | | |
| Active | Registered | Regular | Brown County | 11/02/2020 | Voted in Person | Regular | | Official | Active | Returned | Voted in Person | 11/02/2020 | 11/02/2020 | | | |
| Active | Registered | Regular | Brown County | 11/02/2020 | Online | | | | | | | | | | | |
| Active | Registered | Regular | Brown County | 11/02/2020 | Received in Person | Hospitaliz | | Official | Active | Returned | Appointed Agent | 11/02/2020 | 11/02/2020 | | | |
| Active | Registered | Regular | Brown County | 11/02/2020 | Email | Hospitaliz | | Official | Active | Returned | Appointed Agent | 11/02/2020 | 11/02/2020 | | | |
| Active | Registered | Military | Brown County | 11/02/2020 | Mail | | | | | | | | | | | |
| Active | Registered | Regular | Brown County | 11/02/2020 | Mail | Regular | | Official | Active | Returned | Appointed Agent | 11/02/2020 | 11/02/2020 | | | |
| Active | Registered | Regular | Brown County | 11/02/2020 | Mail | Regular | | Official | Active | Returned | Appointed Agent | 11/02/2020 | 11/02/2020 | | | |
| Active | Registered | Military | Brown County | 11/02/2020 | Online | Military | | Official | Active | Not Returned | Online | 11/02/2020 | | | | |
| Active | Registered | Military | Brown County | 11/02/2020 | Online | Military | | Official | Active | Not Returned | Online | 11/02/2020 | | | | |
| Active | Registered | Military | Brown County | 11/02/2020 | FPCA | Military | | Official | Active | Not Returned | Mail | 11/02/2020 | | | | |
| Active | Registered | Military | Brown County | 11/02/2020 | FPCA | Military | | Official | Active | Returned | Email | 11/02/2020 | 11/03/2020 | | | |
| Active | Registered | Regular | Brown County | 11/03/2020 | Voted in Person | Regular | | Official | Inactive | Voter Spoiled | Voted in Person | 11/03/2020 | 11/03/2020 | | | |
| Active | Registered | Military | Brown County | 11/03/2020 | Mail | Military | Certification insufficient | Federal Absent | Active | Returned, to be Rejected | Mail | 11/03/2020 | 11/03/2020 | | | |
| Active | Registered | Military | Brown County | 11/03/2020 | Mail | Military | | Official | Active | Not Returned | Mail | 11/03/2020 | | | | |
| Active | Registered | Military | Brown County | 11/03/2020 | Online | | | | | | | | | | | |
| Active | Registered | Regular | Brown County | 11/03/2020 | Online | | | | | | | | | | | |
| Active | Registered | Regular | Brown County | 11/04/2020 | Online | | | | | | | | | | | |
| Active | Registered | Regular | Brown County | 11/04/2020 | Online | | | | | | | | | | | |
| Active | Registered | Regular | Brown County | 11/04/2020 | Online | | | | | | | | | | | |
| Active | Registered | Regular | Brown County | 11/04/2020 | Online | | | | | | | | | | | |
| Active | Registered | Regular | Brown County | 11/04/2020 | Online | | | | | | | | | | | |
| Active | Registered | Regular | Brown County | 11/04/2020 | Online | | | | | | | | | | | |
| Active | Registered | Regular | Brown County | 11/04/2020 | Online | | | | | | | | | | | |
| Active | Registered | Regular | Brown County | 11/04/2020 | Online | | | | | | | | | | | |
| Active | Registered | Regular | Brown County | 11/04/2020 | Online | | | | | | | | | | | |
| Active | Registered | Regular | Brown County | 11/04/2020 | Online | | | | | | | | | | | |

83.

84.

86. On or about April 2013 a one year plan was set to fund and usher elections in -----.

88. John Owen Brennan and James (Jim) Clapper were responsible for the ushering of the intelligence surrounding the elections in -----.

90.

91. Right before the ----- elections it was alleged that CyberBerkut a pro-Russia group infiltrated --- central election computers and **deleted key files**. These actions supposedly rendered the vote-tallying system inoperable.
92. In fact, the KEY FILES were the Commitment keys to allow Scytl to tally the votes rather than the election machines. The group had disclosed emails and other documents proving that their election was rigged and that they tried to avoid a fixed election.
93. The elections were held on May 25, 2014 but in the early AM hours the election results were BLOCKED and the final tally was DELAYED flipping the election in favor of -----.
94. The claim was that there was a DDoS attack by Russians when in actual fact it was a mitigation of the algorithm to inject block votes as we observed was done for Joe Biden because the KEYS were unable to be deployed. In the case of -----, the trap-door key was “altered”/deleted/ rendered ineffective. In the case of the US elections, representatives of Dominion/ ES&S/ Smartmatic/ Hart Intercivic would have to manually deploy them since if the entry points into the systems seemed to have failed.
95. The vote tallying of all states NATIONWIDE stalled and hung for days – as in the case of Alaska that has about 300K registered voters but was stuck at 56% reporting for almost a week.
96. This “hanging” indicates a failed deployment of the scripts to block allocate remotely from one location as observed in ----- on May 26, 2014.
97. This would justify the presence of the election machine software representatives making physical appearances in the states where the election results are currently being contested.
98. A Dominion Executive appeared at the polling center in Detroit after midnight.
99. Considering that the hardware of the machines has NOT been examined in Michigan since 2017 by Pro V& V according to Michigan’s own reporting. COTS are an avenue that hackers and bad actors seek to penetrate in order to control operations. Their software updates are the reason vulnerabilities to foreign interference in all operations exist.
100. The importance of VSTLs is underrated to protect up from foreign interference by way of open access via COTS software. Pro V& V who’s EAC certification EXPIRED on 24 FEB 2017 was contracted with the state of WISCONSIN.
101. In the United States each state is tasked to conduct and IV& V (Independent Verification and Validation) to provide assurance of the integrity of the votes.
102. If the “accredited” non-federal entities have NOT received EAC accreditation this is a failure of the states to uphold their own states standards that are federally regulated.
103. In addition, if the entities had NIST certificates they are NOT sufficing according the HAVA ACT 2002 as the role of NIST is clear.
104. Curiously, both companies PRO V&V and SLI GAMING received NIST certifications OUTSIDE the 24 month scope.

105. PRO V& V received a NIST certification on 26MAR2020 for ONE YEAR. Normally the NIST certification is good for two years to align with that of EAC certification that is good for two years.



- 106.
107. The last PRO V& V EAC accreditation certificate (Item 8) of this declaration expired in February 2017 which means that the IV & V conducted by Michigan claiming that they were accredited is false.
108. The significance of VSTLs being accredited and examining the HARDWARE is key. COTS software updates are the avenues of entry.
109. As per DOMINION'S own petition, the modems they use are COTS therefore failure to have an accredited VSTL examine the hardware for points of entry by their software is key.

| | | | |
|----------------------|--|--|--|
| *Compact Flash Cards | ***SanDisk Ultra: SDCFHS-004G SDCFHS-008G <u>RiData:</u> CFC-14A RDF8G-233XMCB2-1 RDF16G-233XMCB2-1 RDF32G-233XMCB2-1 <u>SanDisk Extreme:</u> SDCFX-016G SDCFX-032G <u>SanDisk:</u> SDFAA-008G | | Memory device for ICP and ICE tabulators. |
| *Modems | Verizon USB Modem Pantech UMW190NCD USB Modem MultiTech MT9234MU CellGo Cellular Modem E-Device 3GPUSUS AT&T USB Modem MultiTech GSM MTD-H5 Fax Modem US Robotics 56K V.92. | | Analog and wireless modems for transmitting unofficial election night results. |

110.

111. For example and update of Verizon USB Modem Pantech undergoes multiple software updates a year for it's hardware. That is most likely the point of entry into the systems.

112. During the 2014 elections in ---- it was the modems that gave access to the systems where the commitment keys were deleted.

113. SLI Gaming is the other VSTL "accredited" by the EAC BUT there is no record of their accreditation. In fact, SLI was NIST ISO Certified 27 days before the election which means that PA IV&V was conducted without NIST cert for SLI being valid.

United States Department of Commerce
National Institute of Standards and Technology



Certificate of Accreditation to ISO/IEC 17025:2017

NVLAP LAB CODE: 200733-0

SLI Compliance
Wheat Ridge, CO

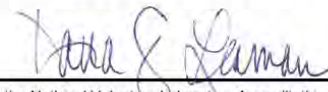
*is accredited by the National Voluntary Laboratory Accreditation Program for specific services,
listed on the Scope of Accreditation, for:*

Voting System Testing

*This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017.
This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality
management system (refer to joint ISO-ILAC-IAF Communiqué dated January 2009).*

2020-10-07 through 2020-12-31
Effective Dates




For the National Voluntary Laboratory Accreditation Program

- 114.
115. In fact SLI was NIST ISO Certified for less than 90 days.
116. I can personally attest that high-level officials of the Obama/Biden administration and large private contracting firms met with a software company called GEMS which is ultimately the software ALL election machines run now running under the flag of DOMINION.
117. GEMS was manifested from SOE software purchased by SCYTL developers and US Federally Funded persons to develop it.
118. The only way GEMS can be deployed across ALL machines is IF all counties across the nation are housed under the same server networks.
119. GEMS was tasked in 2009 to a contractor in Tampa, FL.
120. GEMS was also fine-tuned in Latvia, Belarus, Serbia and Spain to be localized for EU deployment as observed during the Swissport election debacle.
121. John McCain's campaign assisted in FUNDING the development of GEMS web monitoring via WEB Services with 3EDC and Dynology.

SCHEDULE B-P **ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 7358 / 8595

☒ 23 ☐ 24 ☐ 25 ☐ 26 ☐ 27a
☐ 27b ☐ 28a ☐ 28b ☐ 28c ☐ 29

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NAME OF COMMITTEE (in Full)

JOHN MCCAIN 2008, INC.

Full Name (Last, First, Middle Initial)

A. 3EDC LLC

Date of Disbursement

03 17 2008

Mailing Address 211 NORTH UNION ST STE 200

City State Zip Code
ALEXANDRIA VA 22314

Purpose of Disbursement
WEB SERVICE

Candidate Name

Category/
Type

Transaction ID : SB23.10515

Amount of Each Disbursement this Period

3999.16.09

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For: 2008

☒ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Full Name (Last, First, Middle Initial)

B. A FARE EXTRAORDINAIRE

Date of Disbursement

03 17 2008

Mailing Address 2035 MARSHALL

City State Zip Code
HOUSTON TX 77098

Purpose of Disbursement
FACILITY RENTAL/CATERING

Candidate Name

Category/
Type

Transaction ID : SB23.10049

Amount of Each Disbursement this Period

23697.69

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For: 2008

☒ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Full Name (Last, First, Middle Initial)

C. ADMINISTAFF

Date of Disbursement

03 06 2008

Mailing Address PO BOX 203332

City State Zip Code
HOUSTON TX 77216

Purpose of Disbursement
INSURANCE

Candidate Name

Category/
Type

Transaction ID : SB23.10117

Amount of Each Disbursement this Period

483.68

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For: 2008

☒ Primary ☐ General
☐ Other (specify) ▼

State:

District:

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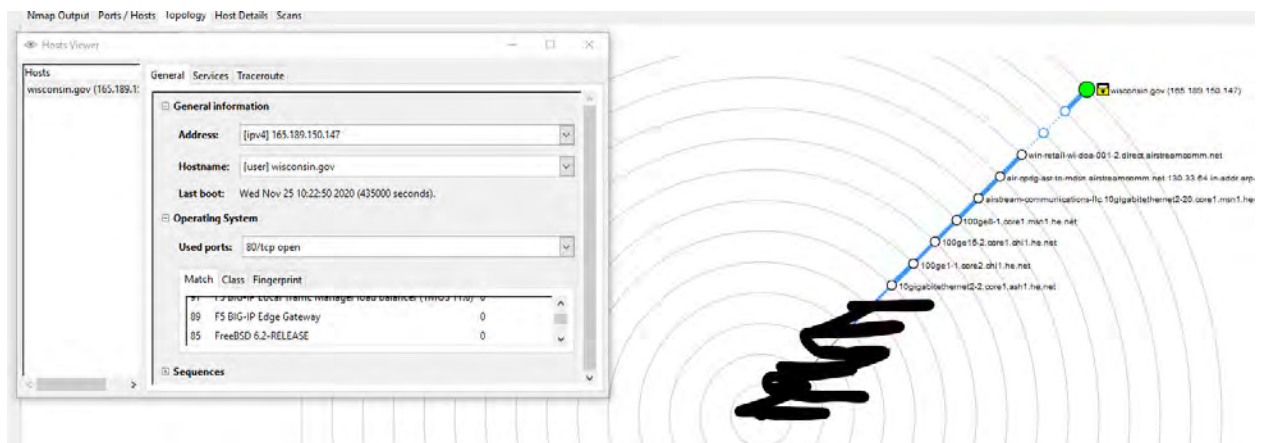
Total This Period (last page this line number only).....

122.

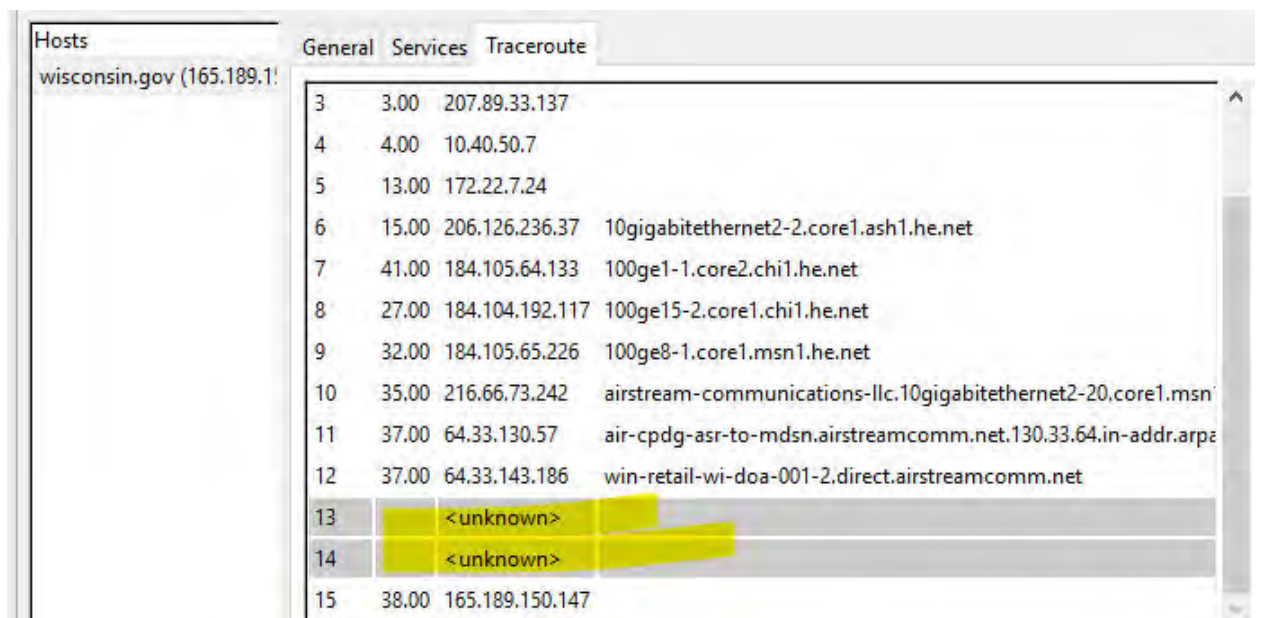
123.

124. AKAMAI Technologies services SCYTL.

125. AKAMAI Technologies Houses ALL foreign government sites. (Please see White Paper by Akamai.)
126. AKAMAI Technologies houses ALL .gov state sites. (ref Item 123 Wisconsin.gov Example)



- 127.
128. Wisconsin has EDGE GATEWAY port which is AKAMAI TECHNOLOGIES based out of GERMANY.
129. Using AKAMAI Technologies is allowing .gov sites to obfuscate and mask their systems by way of HURRICANE ELECTRIC (he.net) Kicking it to anonymous (AKAMAI Technologies) offshore servers.



- 130.
131. AKAMAI Technologies has locations around the world.
132. AKAMAI Technologies has locations in China (ref item 22)
133. AKAMAI Technologies has locations in Iran as of 2019.
134. AKAMAI Technologies merged with UNICOM (CHINESE TELECOMM) in 2018.
135. AKAMAI Technologies house all state .gov information in GERMANY via TELIA AB.

136. In my professional opinion, this affidavit presents unambiguous evidence:

137. That there was Foreign interference, complicit behavior by the previous administrations from 1999 up until today to hinder the voice of the people and US persons knowingly and willingly colluding with foreign powers to steer our 2020 elections that can be named in a classified setting.

138. Foreign interference is present in the 2020 election in various means namely,

139. Foreign nationals assisted in the creation of GEMS (Dominion Software Foundation)

140. Akamai Technologies merged with a Chinese company that makes the COTS components of the election machines providing access to our electronic voting machines.

141. Foreign investments and interests in the creation of the GEMS software.

142. US persons holding an office and private individuals knowingly and willingly oversaw fail safes to secure our elections.

143. The EAC failed to abide by standards set in HAVA ACT 2002.

144. The IG of the EAC failed to address complaints since their appointment regarding vote integrity

145. Christy McCormick of the EAC failed to ensure that EAC conducted their duties as set forth by HAVA ACT 2002

146. Both Patricia Layfield (IG of EAC) and Christy McCormick (Chairwoman of EAC) were appointed by Barack Hussein Obama and have maintained their positions since then.

147. The EAC failed to have a quorum for over a calendar year leading to the inability to meet the standards of the EAC.

148. AKAMAI Technologies and Hurricane Electric raise serious concerns for NATSEC due to their ties with foreign hostile nations.

149. For all the reasons above a complete failure of duty to provide safe and just elections are observed.

150. For the people of the United States to have confidence in their elections our cybersecurity standards should not be in the hands of foreign nations.

151. Those responsible within the Intelligence Community directly and indirectly by way of procurement of services should be held accountable for assisting in the development, implementation and promotion of GEMS.

152. GEMS ----- General Hayden.

153. In my opinion and from the data and events I have observed ----- with the assistance of SHADOWNET under the guise of L3-Communications which is MPRI. This is also confirmed by [us.army.mil](https://www.us.army.mil) making the statement that shadownet has been deployed to 30 states which all

happen to be using Dominion Machines.

FAIRFAX, Va. -The Virginia National Guard's Bowling Green-based 91st Cyber Brigade completed the nationwide rollout of its ShadowNet enterprise solution July 19, 2019, with the integration of the 125th Cyber Protection Battalion into the solution's virtual private network. ShadowNet is a custom-built private cloud-based out of the brigade's data center in Fairfax, Virginia, that uses VPN connectivity to provide its aligned units with 24-hour, seven-days-a-week remote access to critical cyber training at both the collective and individual levels. The brigade successfully integrated its three other cyber protection battalions - the 123rd, 124th, and 126th Cyber Protection Battalions - into the ShadowNet platform last January.

"I'm extremely proud to announce that the Soldiers of the 91st Cyber Brigade have completed the construction and rollout of ShadowNet, a world-class enterprise solution designed to propel operational innovation in the field of cyber training," said Col. Adam C. Volant, commander of the 91st Cyber Brigade. "ShadowNet will allow us to leverage the expertise of cyber professionals across our four cyber protection battalions to build Soldier-centric programs and collective training environments that deliver breakthroughs in exercise complexity and cost efficiency. Its robust

OCTOBER 26, 2020

U.S. Army STAND-TO! | Army Readiness Training

SEPTEMBER 12, 2019

September 2017 Nominative Sergeant: Major Assignments

SEPTEMBER 12, 2019

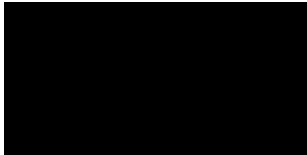
DA ANNOUNCES ROTATIONAL DEPLOYMENTS

154. Based on my research of voter data – it appears that there are approximately 23,000 residents of a Department of Corrections Prison with requests for absentee ballot in Wisconsin. We are currently reviewing and verifying the data and will supplement.

| | | | | | | | |
|-------|--------------|-------------|-----------|---------|----|---------------|--------------------|
| | 23230 | Gutierrez | Mary | Jane | | (262)994-9050 | |
| 23231 | 23231 | Hansen | Luann | M | | (262)994-9050 | |
| 23232 | 23232 | Neberman | John | C | | (262)994-9050 | |
| 23233 | 23233 | Reynolds | Devi | J | | (262)994-9050 | |
| 23234 | 23234 | Rieckhoff | Kathryn | Susan | | (262)994-9050 | |
| 23235 | 23235 | Edwards | Mark | Landon | | (262)994-9050 | |
| 23236 | 23236 | Pfeiffer | Joseph | Patrick | | (262)994-9050 | |
| 23237 | 23237 | Hines | Dianna | K | | (262)994-9050 | |
| 23238 | 23238 | Beachem | Janice | F | | (262)994-9050 | |
| 23239 | 23239 | Blackstone | Thomas | Wayne | | (262)994-9050 | |
| 23240 | 23240 | Braun | Patricia | Ann | | (262)994-9050 | |
| 23241 | 23241 | Smith | Raymond | L | | (262)994-9050 | |
| 23242 | 23242 | Meyer | Steven | R | | (262)994-9050 | |
| 23243 | 23243 | Vincent | Herbert | | | (262)994-9050 | |
| 23244 | 23244 | Guajardo | Juan | P | | (262)994-9050 | |
| 23245 | 23245 | Wallace | Kirk | R | | (262)994-9050 | |
| 23246 | 23246 | Kaplan | Bernard | L | | (262)994-9050 | |
| 23247 | 23247 | Bahrs | Michelle | M | | (262)994-9050 | |
| 23248 | 23248 | Shattuck | Elizabeth | L | | (262)994-9050 | |
| 23249 | 23249 | Munoz | Rosalio | S | JR | (262)994-9050 | |
| 23250 | 23250 | Strunk | Amy | C | | (262)994-9050 | |
| 23251 | 23251 | Schendel | Michael | P | JR | (262)994-9050 | |
| 23252 | 23252 | Mack | Kimberly | N | | (262)994-9050 | |
| 23253 | 23253 | Spikes | Debra | A | | (262)994-9050 | |
| 23254 | 23254 | Busarow | Suzanne | M | | (262)994-9050 | |
| 23255 | 23255 | Oliver | Timmy | | | (262)994-9050 | |
| 23256 | 23256 | Wember | Jimmy | Dean | | (262)994-9050 | |
| 23257 | 23257 | Kosterman | Michael | Richard | | (262)994-9050 | |
| 23258 | 23258 | Szaradowski | Paul | M | | (262)994-9050 | |
| 23259 | 23259 | Oliver | Dale | | | (262)994-9050 | |
| 23260 | 23260 | Derango | Nancy | | | (262)994-9050 | |
| 23261 | 23261 | Smith | Arthur | J | | (262)994-9050 | SMITH24.3059@YAHOO |
| 23262 | 23262 | Brown | Michael | Edward | | (262)994-9050 | |

I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge.

Executed this November 29th, 2020.

A large black rectangular redaction box covering the signature area.A small black rectangular redaction box covering the name.

DECLARATION OF RONALD WATKINS

I, Ronald Watkins, hereby state the following:

1. My name is Ronald Watkins. I am a United States citizen currently residing in Japan.
2. I am an adult of sound mind. All statements in this declaration are based on my personal knowledge and are true and correct. I am making this statement voluntarily and on my own initiative. I have not been promised, nor do I expect to receive, anything in exchange for my testimony and giving this statement. I have no expectation of any profit or reward and understand that there are those who may seek to harm me for what I say in this statement.
3. I make this declaration because I want to alert the public and let the world know the truth about the insecurity of actual voting tabulation software used in various states for administering the 2020 Presidential and other elections. The software is designed, whether with malicious intent or through plain incompetence, in such a way so as to facilitate digital ballot stuffing via simple vote result manipulation and abuse of the digital adjudication manual review system. Specifically, the Dominion Democracy Suite both enables voter fraud by unethical officials out to undermine the will of the people and facilitates tabulation errors by honest officials making simple, nearly untraceable mistakes.
4. I believe voting is a fundamental manifestation of our right to self-government, including our right to free speech. Under no circumstance should we allow a conspiracy of people and companies to subvert and destroy our most sacred rights.
5. I am a network and information security expert with nine years of experience as a network and information defense analyst and a network security engineer. In my nine years of network and information security experience, I have successfully defended large websites and complex networks against powerful cyberattacks. I have engaged in extensive training and education and learned through experience how to secure websites and networks.
6. In preparation for making this declaration, I have reviewed extensive technical materials relating to the Dominion Voting Democracy Suite, including those cited herein.
7. The Dominion Voting Systems ImageCast Central system is a software and hardware workstation system designed to work with just a common "Windows 10 Pro"¹² computer

¹ Dominion Voting, *Democracy Suite®ImageCast® Central User Guide*, p3, [online document], <https://www.sos.state.co.us/pubs/elections/VotingSystems/DVS-documentation/UG-ICC-UserGuide-5-11-CO.pdf> (Accessed November 23, 2020)
<https://web.archive.org/web/20201019175854/https://www.sos.state.co.us/pubs/elections/VotingSystems/DVS-DemocracySuite511/documentation/UG-ICC-UserGuide-5-11-CO.pdf> [archive]

² Georgia State Certification Testing, Dominion Voting Systems D-Suite 5.5-A Voting System, p5, table 2-1, [online document]
https://sos.ga.gov/admin/uploads/Dominion_Test_Cert_Report.pdf (accessed November, 23,

paired via data cable³ to an off-the-shelf document scanner⁴ “for high speed scanning and counting of paper ballots.”⁵

8. When bulk ballot scanning and tabulation begins, the “ImageCast Central” workstation operator will load a batch of ballots into the scanner feed tray and then start the scanning procedure within the software menu.⁶ The scanner then begins to scan the ballots which were loaded into the feed tray while the “ImageCast Central” software application

2020),
https://web.archive.org/web/20201106055006/https://sos.ga.gov/admin/uploads/Dominion_Test_Cert_Report.pdf [archive].

³ Dominion Voting, *Democracy Suite®ImageCast® Central User Guide*, p2, s2.1, [online document, <https://www.sos.state.co.us/pubs/elections/VotingSystems/DVS-DemocracySuite511/documentation/UG-ICC-UserGuide-5-11-CO.pdf> (Accessed November 23, 2020) <https://web.archive.org/web/20201019175854/https://www.sos.state.co.us/pubs/elections/VotingSystems/DVS-DemocracySuite511/documentation/UG-ICC-UserGuide-5-11-CO.pdf> [archive].

⁴ Michigan.gov, DOMINION VOTING SYSTEMS CONTRACT No. 071B7700117, p6, 1.1.E.1, [online document],
https://www.michigan.gov/documents/sos/071B7700117_Dominion_Exhibit_2_to_Sch_A_Tech_Req_555357_7.pdf (accessed November 23, 2020),
https://web.archive.org/web/20201115084004/https://www.michigan.gov/documents/sos/071B7700117_Dominion_Exhibit_2_to_Sch_A_Tech_Req_555357_7.pdf [archive]

⁵ Commonwealth of Pennsylvania Department of State, Report Concerning the Examination Results of Dominion Voting Systems Democracy Suite 5.5A p6, s2.4, [online document],
<https://www.dos.pa.gov/VotingElections/Documents/Voting%20Systems/Dominion%20Democracy%20Suite%205.5-A/Dominion%20Democracy%20Suite%20Final%20Report%20scanned%20with%20signature%20011819.pdf> (accessed November 23, 2020),
<https://web.archive.org/web/20201016161321/https://www.dos.pa.gov/VotingElections/Documents/Voting%20Systems/Dominion%20Democracy%20Suite%205.5-A/Dominion%20Democracy%20Suite%20Final%20Report%20scanned%20with%20signature%20011819.pdf> [archive]

⁶ Dominion Voting, ImageCast Central, p2, [online document],
<https://www.edcgov.us/Government/Elections/Documents/ImageCast%20Central%20Brochure%202018%20FINAL.pdf> (accessed November 23, 2020)
<https://web.archive.org/web/20201017175507/https://www.edcgov.us/Government/Elections/Documents/ImageCast%20Central%20Brochure%202018%20FINAL.pdf> [archive]

tabulates votes in real-time. Information about scanned ballots can be tracked inside the “ImageCast Central” software application.⁷

9. After all of the ballots loaded into the scanner’s feed tray have been through the scanner, the “ImageCast Central” operator will remove the ballots from the tray and then will have the option to “Accept Batch” on the scanning menu.⁸ Accepting the batch saves the results into the local file system within the “Windows 10 Pro” machine.⁹ Any “problem ballots” that may need to be examined or adjudicated at a later time can be found as ballot scans saved as image files into a standard Windows folder named “NotCastImages”.¹⁰ These “problem ballots” are automatically detected during the scanning phase and digitally set aside for manual review based on exception criteria.¹¹ Examples of exceptions may include: overvotes, undervotes, blank contests, blank ballots, write-in selections, and marginal

⁷ Dominion Voting, Democracy Suite®ImageCast® Central User Guide, p25, s4.1.2, [online document], <https://www.sos.state.co.us/pubs/elections/VotingSystems/DVS-DemocracySuite511/documentation/UG-ICC-UserGuide-5-11-CO.pdf> (Accessed November 23, 2020), <https://web.archive.org/web/20201019175854/https://www.sos.state.co.us/pubs/elections/VotingSystems/DVS-DemocracySuite511/documentation/UG-ICC-UserGuide-5-11-CO.pdf> [archive].

⁸ Dominion Voting, ImageCast Central, [website], <https://www.dominionvoting.com/imagecast-central/> (Accessed November 23, 2020) <https://web.archive.org/web/20201101203418/https://www.dominionvoting.com/imagecast-central/> [archive].

⁹ Dominion Voting, Democracy Suite®ImageCast® Central User Guide, p25, s4.1.2, [online document], <https://www.sos.state.co.us/pubs/elections/VotingSystems/DVS-DemocracySuite511/documentation/UG-ICC-UserGuide-5-11-CO.pdf> (Accessed November 23, 2020), <https://web.archive.org/web/20201019175854/https://www.sos.state.co.us/pubs/elections/VotingSystems/DVS-DemocracySuite511/documentation/UG-ICC-UserGuide-5-11-CO.pdf> [archive].

¹⁰ Dominion Voting, Democracy Suite®ImageCast® Central User Guide, p25, s4.1.2, [online document], <https://www.sos.state.co.us/pubs/elections/VotingSystems/DVS-DemocracySuite511/documentation/UG-ICC-UserGuide-5-11-CO.pdf> (Accessed November 23, 2020), <https://web.archive.org/web/20201019175854/https://www.sos.state.co.us/pubs/elections/VotingSystems/DVS-DemocracySuite511/documentation/UG-ICC-UserGuide-5-11-CO.pdf> [archive].

¹¹ Michigan.gov, DOMINION VOTING SYSTEMS CONTRACT No. 071B7700117, p21, 1.3.B.6, [online document], https://www.michigan.gov/documents/sos/071B7700117_Dominion_Exhibit_2_to_Sch_A_Tech_Req_555357_7.pdf (accessed November 23, 2020), https://web.archive.org/web/20201115084004/https://www.michigan.gov/documents/sos/071B7700117_Dominion_Exhibit_2_to_Sch_A_Tech_Req_555357_7.pdf [archive].

marks.”¹² Customizable outstack conditions and marginal mark detection lets [Dominion's Customers] decide which ballots are sent for Adjudication.¹³

10. During the ballot scanning process, the “ImageCast Central” software will detect how much of a percent coverage of the oval was filled in by the voter.¹⁴ The Dominion customer determines the thresholds of which the oval needs to be covered by a mark in order to qualify as a valid vote.¹⁵ If a ballot has a marginal mark which did not meet the specific thresholds set by the customer, then the ballot is considered a “problem ballot” and may be set aside into a folder named “NotCastImages.”¹⁷ “The ImageCast Central's advanced

¹² [11] MASTER SOLUTION PURCHASE AND SERVICES AGREEMENT BY AND BETWEEN DOMINION VOTING SYSTEMS, INC. as Contractor, and SECRETARY OF STATE OF THE STATE OF GEORGIA as State, p52, s1.3, [online document], <https://georgiaelections.weebly.com/uploads/1/0/8/5/108591015/contract.pdf> (Accessed November 23, 2020), <https://web.archive.org/web/20201122213728/https://georgiaelections.weebly.com/uploads/1/0/8/5/108591015/contract.pdf> [archive].

¹³ Dominion Voting, ImageCast Central, [website], <https://www.dominionvoting.com/imagecast-central/> (Accessed November 23, 2020) <https://web.archive.org/web/20201101203418/https://www.dominionvoting.com/imagecast-central/> [archive].

¹⁴ Michigan.gov, DOMINION VOTING SYSTEMS CONTRACT No. 071B7700117, p3, 1.1.A.22, [online document], https://www.michigan.gov/documents/sos/071B7700117_Dominion_Exhibit_2_to_Sch_A_Tech_Req_555357_7.pdf (accessed November 23, 2020), https://web.archive.org/web/20201115084004/https://www.michigan.gov/documents/sos/071B7700117_Dominion_Exhibit_2_to_Sch_A_Tech_Req_555357_7.pdf [archive].

¹⁵ Calhoun County, MI, ImageCast Central (ICC) 5.5 Operations, p19, [online document], https://cms5.revize.com/revize/calhouncountymi/Clerk%20&%20Register%20of%20Deeds/local%20clerk%20resources/5_5_icc_operations_manual.pdf (accessed November 23, 2020), https://web.archive.org/web/20200802003507/https://cms5.revize.com/revize/calhouncountymi/Clerk%20&%20Register%20of%20Deeds/local%20clerk%20resources/5_5_icc_operations_manual.pdf [archive].

¹⁶ IMAGECAST® CENTRAL Brochure, [website], <https://www.edcgov.us/Government/Elections/Documents/ImageCast%20Central%20Brochure%202018%20FINAL.pdf> (accessed November 23, 2020), <https://web.archive.org/web/20201017175507/https://www.edcgov.us/Government/Elections/Documents/ImageCast%20Central%20Brochure%202018%20FINAL.pdf> [archive].

¹⁷ Dominion Voting, Democracy Suite®ImageCast® Central User Guide, p25, s4.1.2, [online document], <https://www.sos.state.co.us/pubs/elections/VotingSystems/DVS-DemocracySuite511/documentation/UG-ICC-UserGuide-5-11-CO.pdf> (Accessed November 23, 2020), <https://web.archive.org/web/20201019175854/https://www.sos.state.co.us/pubs/>

settings allow for adjustment of the scanning properties to “[set] the clarity levels at which the ballot should be scanned at.” Levels can be set as a combination of brightness and contrast values, or as a gamma value.”¹⁸

11. Based on my review of these materials, I conclude the system is designed in such a way that it allows a dishonest or otherwise unethical election administrator to creatively tweak the oval coverage threshold settings and advanced settings on the ImageCast Central scanners to set thresholds in such a way that a non-trivial amount of properly-marked ballots are marked as “problem ballots” and sent to the “NotCastImages” folder.
12. The administrator of the ImageCast Central work-station may view all images of scanned ballots which were deemed “problem ballots” by simply navigating via the standard “Windows File Explorer” to the folder named “NotCastImages” which holds ballot scans of “problem ballots.”¹⁹²⁰ Under this system, it is possible for an administrator of the “ImageCast Central” workstation to view and delete any individual ballot scans from the “NotCastImages” folder by simply using the standard Windows delete and recycle bin functions provided by the Windows 10 Pro operating system. Adjudication is “the process of examining voted ballots to determine, and, in the judicial sense, adjudicate voter intent.”²¹

elections/VotingSystems/DVS-DemocracySuite511/documentation/UG-ICC-UserGuide- 5-11-CO.pdf [archive].

¹⁸ Dominion Voting, Democracy Suite®ImageCast® Central User Guide, pp20-21, s3.22, [online document], <https://www.sos.state.co.us/pubs/elections/VotingSystems/DVS-DemocracySuite511/documentation/UG-ICC-UserGuide-5-11-CO.pdf> (Accessed November 23, 2020), <https://web.archive.org/web/20201019175854/https://www.sos.state.co.us/pubs/elections/VotingSystems/DVS-DemocracySuite511/documentation/UG-ICC-UserGuide- 5-11-CO.pdf> [archive].

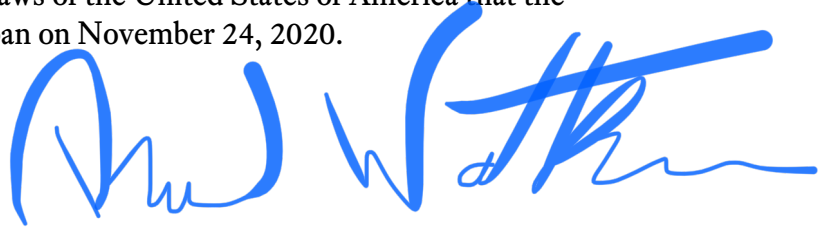
¹⁹ Dominion Voting, Democracy Suite® Use Procedures, p433, F.3.11, [online document] <https://votingsystems.cdn.sos.ca.gov/vendors/dominion/ds510-use-proc-jan.pdf> (Accessed November 23, 2020), <https://web.archive.org/web/20201101173723/https://votingsystems.cdn.sos.ca.gov/vendors/dominion/ds510-use-proc-jan.pdf> [archive].

²⁰ Calhoun County, MI, ImageCast Central (ICC) 5.5 Operations, p27, [online document], https://cms5.revize.com/revize/calhouncountymi/Clerk%20&%20Register%20of%20Deeds/local%20clerk%20resources/5_5_icc_operations_manual.pdf (accessed November 23, 2020), https://web.archive.org/web/20200802003507/https://cms5.revize.com/revize/calhouncountymi/Clerk%20&%20Register%20of%20Deeds/local%20clerk%20resources/5_5_icc_operations_manual.pdf [archive].

²¹ Dominion Voting, Democracy Suite® Use Procedures, p9, [online document] <https://votingsystems.cdn.sos.ca.gov/vendors/dominion/ds510-use-proc-jan.pdf> (Accessed November 23, 2020),

13. Based on my review of these materials, I conclude that a biased poll worker without sufficient and honest oversight could abuse the adjudication system to fraudulently switch votes for a specific candidate.
14. After the tabulation process, the ImageCast Central software saves a copy of the tabulation results locally to the “Windows 10 Pro” machine's internal storage. The results data is located in an easy-to-find path which is designed to easily facilitate the uploading of tabulation results to flash memory cards. The upload process is just a simple copying of a “Results” folder containing vote tallies to a flash memory card connected to the “Windows 10 Pro” machine. The copy process uses the standard drag-and-drop or copy/paste mechanisms within “Windows File Explorer.”²² It is my conclusion that while this is a simple procedure, the report results process is subject to user errors and is very vulnerable to corrupt manipulation by a malicious administrator. It is my conclusion that, before delivering final tabulation results to the county, it is possible for an administrator to mistakenly copy the wrong “Results” folder or even maliciously copy a false “Results” folder, which could contain a manipulated data set, to the flash memory card and deliver those false “Results” as the outcome of the election.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Japan on November 24, 2020.



Ronald Watkins

<https://web.archive.org/web/20201101173723/https://votingsystems.cdn.sos.ca.gov/vendors/dominion/ds510-use-proc-jan.pdf> [archive].

²² Calhoun County, MI, ImageCast Central (ICC) 5.5 Operations, pp25-28, [online document], https://cms5.revize.com/revize/calhouncountymi/Clerk%20&%20Register%20of%20Deeds/local%20clerk%20resources/5_5_icc_operations_manual.pdf (accessed November 23, 2020), https://web.archive.org/web/20200802003507/https://cms5.revize.com/revize/calhouncountymi/Clerk%20&%20Register%20of%20Deeds/local%20clerk%20resources/5_5_icc_operations_manual.pdf [archive].

Congress of the United States

Washington, DC 20515

October 6, 2006

Henry M. Paulson, Jr.
Secretary
Department of the Treasury
1500 Pennsylvania Ave., N.W.
Washington, D.C. 20220

Dear Mr. Secretary:

I am writing to follow up on my letter of May 4, 2006, to Secretary Snow, seeking review by the Committee on Foreign Investment in the United States of the acquisition of Sequoia Voting Systems by Smartmatic, a foreign-owned company. I believe this transaction raises exactly the sort of foreign ownership issues that CFIUS is best positioned to examine for national security concerns. As discussed below, publicly reported information about Smartmatic's ownership and about the vulnerability of electronic voting machines to tampering raises serious concerns. I strongly urge CFIUS to independently verify the information provided to American officials and the public by Sequoia/Smartmatic, and to take all appropriate measures to safeguard our national security.

It is undisputed that Smartmatic is foreign-owned and it has acquired Sequoia, one of the three major voting machine companies doing business in the U.S. According to a Sequoia press release in May 2006 (copy attached) Sequoia voting machines were used to record over 125 million votes during the 2004 Presidential election in the United States. As we confront another election, Americans deserve to know that the Administration has made sure that any foreign ownership of voting machines poses no national security threat.

Although many press reports have tried, it appears that it is not possible to discern the true owners of Smartmatic from information available to the public. Smartmatic now acknowledges that Antonio Mugica, a Venezuelan businessman, has a controlling interest in Smartmatic, but the company has not revealed who all the other Smartmatic owners are. According to the press, Smartmatic's owners are hidden through a web of off-shore private entities. (See attached articles.)

The opaque nature of Smartmatic's ownership is particularly troubling since Smartmatic has been associated by the press with the Venezuelan government led by Hugo Chavez, which is openly hostile to the United States. According to press reports, Smartmatic shared a founder, officers, directors and a principal place of business with Bizta, a company in which, according to Smartmatic, the Venezuelan government previously held a 28% stake. Mugica is also a director of Bizta.

Henry M. Paulson, Jr.
October 6, 2006
Page 2

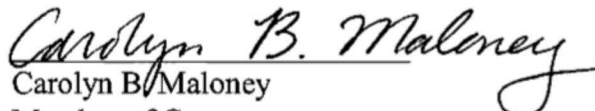
According to Smartmatic press releases, (copies attached) Smartmatic and Bizta were part of the consortium that received the government contract to provide the voting machines for the 2004 referendum election to recall Chavez as Venezuela's president, and have since been awarded other contracts by the Venezuelan government.

Smartmatic's possible connection to the Venezuelan government poses a potential national security concern in the context of its acquisition of Sequoia because electronic voting machines are susceptible to tampering and insiders are in the best position to engage in such tampering. The 2005 Government Accountability Office Report on electronic voting, GAO-05-956, and other private sector studies consistently support this conclusion. Thus, the reports that Sequoia brought Venezuelan nationals to the United States to work on the Chicago 2006 primary election raises questions about whether these individuals are subject to direction from a foreign interest that might pose a threat to the integrity of the election. Similarly, the use of Smartmatic software and machines developed in Venezuela, such as the HAAT software that was at issue in Chicago, raises questions as to whether this software is susceptible to manipulation by its unknown creators. Reportedly, Smartmatic may soon be introducing into the United States the type of electronic voting machines that were used (with Bizta software) in the controversial 2004 Venezuelan recall election, under the label AVC Edge II Plus.

In reviewing the Smartmatic acquisition of Sequoia, it is important that CFIUS understand the products and services that are of Venezuelan origin and evaluate Smartmatic's ownership to determine who could have influence and control over these and other Sequoia products and services that are in use or intended for use in U.S. elections. In light of Smartmatic's failure fully to answer these questions to date, this issue demands the most thorough independent investigation by CFIUS.

Thank you for your consideration of this letter.

Sincerely,


Carolyn B. Maloney
Member of Congress


Attachments

Congress of the United States

Washington, DC 20510

December 6, 2019

Sami Mnaymneh
Founder and Co-Chief Executive Officer
H.I.G. Capital, LLC



Tony Tamer
Founder and Co-Chief Executive Officer
H.I.G. Capital, LLC



Dear Messrs. Mnaymneh and Tamer:

We are writing to request information regarding H.I.G. Capital's (H.I.G.) investment in Hart InterCivic Inc. (Hart InterCivic) one of three election technology vendors responsible for developing, manufacturing and maintaining the vast majority of voting machines and software in the United States, and to request information about your firm's structure and finances as it relates to this company.

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

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

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

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

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

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

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

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

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

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

⁶ Id.

⁷ Id.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Thank you for your attention to this matter.

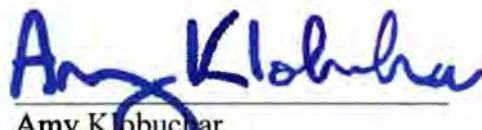
Sincerely,



Elizabeth Warren
United States Senator



Ron Wyden
United States Senator




Amy Klobuchar
United States Senator



Mark Pocan
Member of Congress

Congress of the United States
Washington, DC 20510

December 6, 2019

Michael McCarthy
Chairman
McCarthy Group, LLC


Dear Mr. McCarthy:

We are writing to request information regarding McCarthy Group, LLC's (McCarthy Group) investment in Election Systems & Software (ES&S), one of three election technology vendors responsible for developing, manufacturing and maintaining the vast majority of voting machines and software in the United States, and to request information about your firm's structure and finances as it relates to this company.

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

Over the last two decades, the election technology industry has become highly concentrated, with a handful of consolidated vendors controlling the vast majority of the market. In the early

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

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

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

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

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

Election security experts have noted for years that our nation’s election systems and infrastructure are under serious threat. In January 2017, the U.S. Department of Homeland Security designated the United States’ election infrastructure as “critical infrastructure” in order to prioritize the protection of our elections and to more effectively assist state and local election officials in addressing these risks.¹⁰ However, voting machines are reportedly falling apart across the country, as vendors neglect to innovate and improve important voting systems, putting our

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

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

⁶ Id.

⁷ Id.

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

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

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

elections at avoidable and increased risk.¹¹ In 2015, election officials in at least 31 states, representing approximately 40 million registered voters, reported that their voting machines needed to be updated, with almost every state “using some machines that are no longer manufactured.”¹² Moreover, even when state and local officials work on replacing antiquated machines, many continue to “run on old software that will soon be outdated and more vulnerable to hackers.”¹³

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

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

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

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

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

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

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

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

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

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

- b. For each election technology company McCarthy Group had a stake in or owned in the past twenty years, including all affiliates or related entities, please provide the following information for each year that the firm has had a stake in or owned this company and the five years preceding the firm's investment.
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past twenty years, reached a settlement with any state or local jurisdiction related to a potential violation of or breach of contract? If so, please provide a complete list, including the date and description, of all such settlements.

Thank you for your attention to this matter.

Sincerely,


Elizabeth Warren
United States Senator
Amy Klobuchar
United States Senator
Ron Wyden
United States Senator
Mark Pocan
Member of Congress

Congress of the United States

Washington, DC 20510

December 6, 2019

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

Hootan Yaghoobzadeh
Managing Director
Staple Street Capital Group, LLC
[REDACTED]

Dear Messrs. Owens and Yaghoobzadeh:

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

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

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

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

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

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

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

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

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

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

⁶ Id.

⁷ Id.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

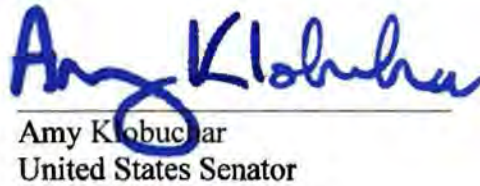
7. Has any election technology company, including all affiliates or related entities, in which Staple Street has an ownership stake or has had an ownership stake in the past twenty years, reached a settlement with any state or local jurisdiction related to a potential violation of or breach of contract?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

Thank you for your attention to this matter.

Sincerely,



Elizabeth Warren
United States Senator



Amy Klobuchar
United States Senator



Ron Wyden
United States Senator



Mark Pocan
Member of Congress

Declaration of Russell James Ramsland, Jr.

1. My name is Russell James Ramsland, Jr., and I am a resident of Dallas County, Texas. I make this declaration pursuant to 28 USC sec 1746. I am over 18 years of age. I hold an MBA from Harvard University, and a political science degree from Duke University. I have worked with the National Aeronautics and Space Administration (NASA) and the Massachusetts Institute of Technology (MIT), among other organizations, and have run businesses all over the world, many of which are highly technical in nature. I have served on technical government panels.

2. I am part of the management team of Allied Security Operations Group, LLC, (ASOG). ASOG is a group of globally engaged professionals who come from various disciplines to include Department of Defense, Secret Service, Department of Homeland Security, and the Central Intelligence Agency. It provides a range of security services, but has a particular emphasis on cybersecurity, open source investigation and penetration testing of networks. We employ a wide variety of cyber and cyber forensic analysts. We have patents pending in a variety of applications from novel network security applications to SCADA (Supervisory Control and Data Acquisition) protection and safe browsing solutions for the dark and deep web. For this report, I have relied on these experts and resources.

3. In November 2018, ASOG analyzed audit logs for the central tabulation server of the ES&S Election Management System (EMS) for the Dallas, Texas, General Election of 2018. Our team was surprised at the enormous number of error messages that should not have been there. They numbered in the thousands, and the operator ignored and overrode all of them. This led to various legal challenges in that election, and we provided evidence and analysis in some of them.

4. As a result, ASOG initiated an 18-month study into the major EMS providers in the United States, among which is Election Systems and Software ("ES&S") that provides EMS services for Wisconsin. We did thorough background research of the literature and discovered there is confirmed evidence from both Democrat and Republican stakeholders in the vulnerability of ES&S. Next, we began doing passive penetration testing into the vulnerabilities described in the literature and confirmed for ourselves that in many cases, past vulnerabilities already identified were still left open to exploit in the November 2020 elections. We also noticed a striking similarity between the approach to software and EMS systems of ES&S and Dominion. This was logical since they share a common ancestry in the Diebold voting system.

5. Over the past three decades, almost all of the states have shifted from a relatively low-technology format to a high-technology format that relies heavily on a handful of private services companies. These private companies supply the hardware and software, often handle voter registrations, hold the voter records, partially manage the elections, program counting the votes and report the outcomes. Wisconsin is one of those states.

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

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

Electionware Servers

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

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

Electionware Clients

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

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

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

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

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

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

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

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

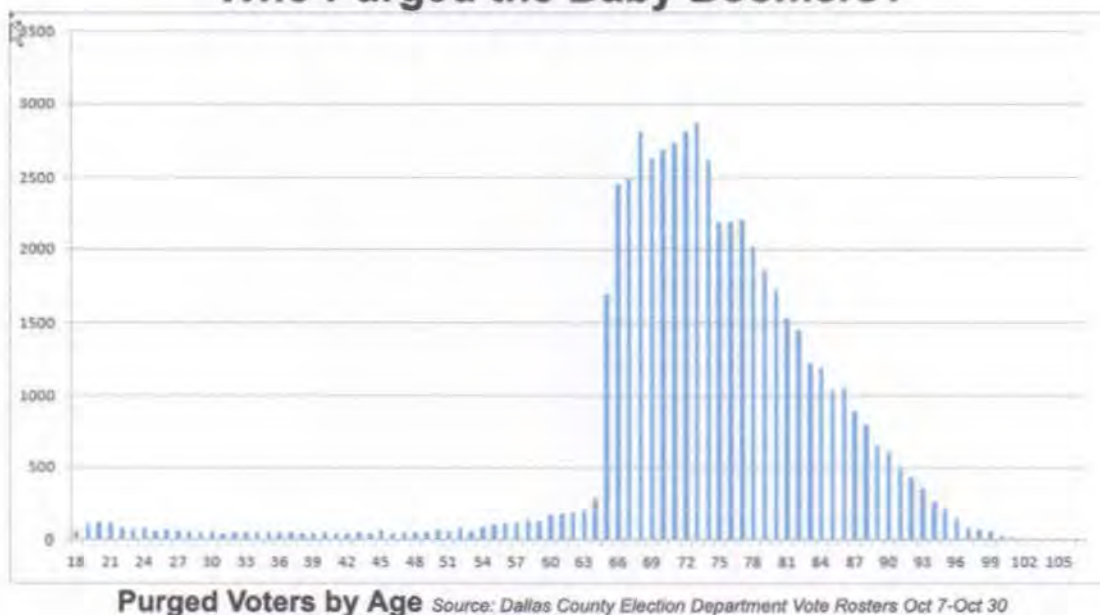
| <u>Country</u> | <u>Voters Who Voted</u> |
|----------------|-------------------------|
| Mexico | 118 |
| Guatemala | 9 |
| Nicaragua | 4 |
| Kenya | 18 |
| Canada | 154 |
| Ireland | 34 |
| China | 62 |
| Australia | 105 |

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

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

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

Who Purged the Baby Boomers?

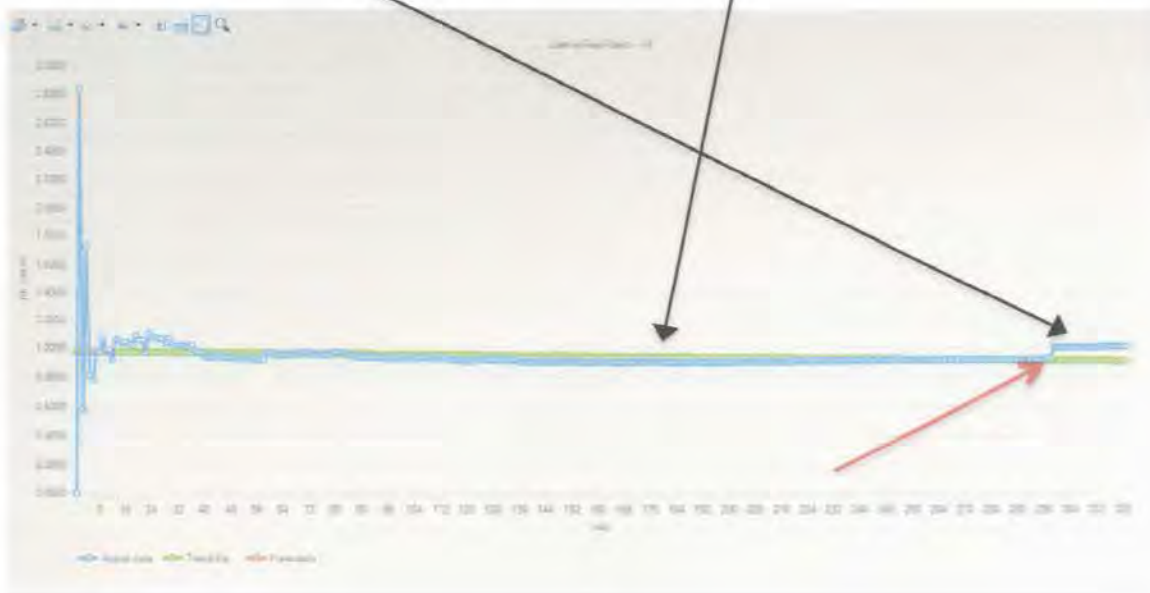


12. My colleagues and I at ASOG have studied the information that is publicly available concerning the November 3, 2020, election results from Wisconsin. Based on the significant anomalies and red flags that we have observed, I believe to a reasonable degree of professional certainty that election results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

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

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

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



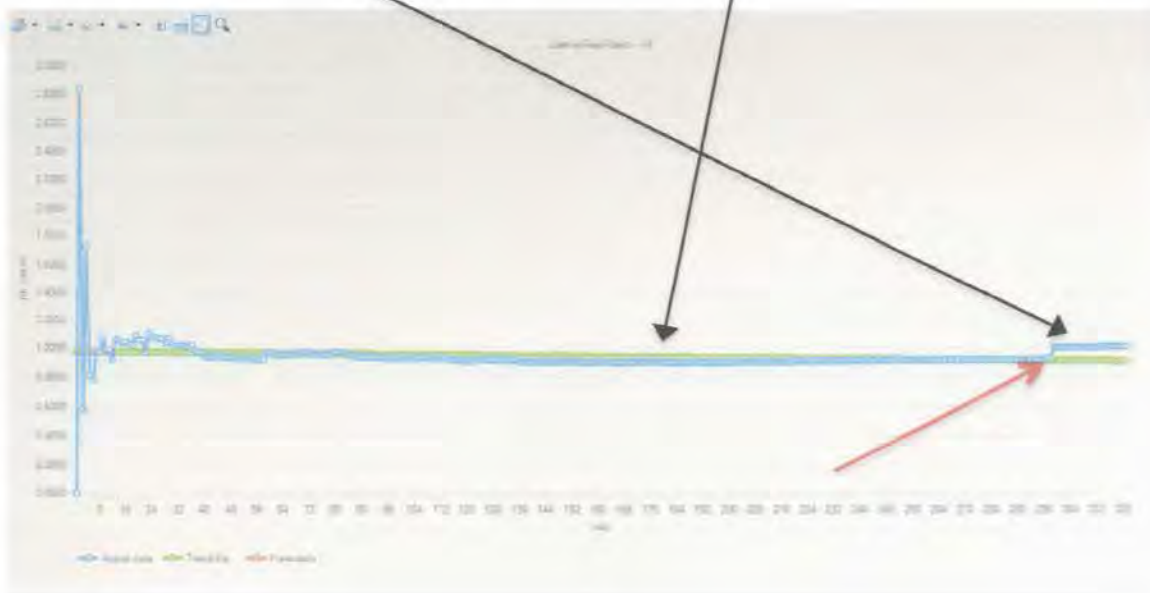
Previous Record

| REGNUM | STATE | TIMESTAMP | VOTES | EEVP | TRUMPO | BIDEN | TRUMP_CUM | BIDEN_CUM | DATE | TIME | DR_RATIO | D_VOTES | R_VOTES | LOG_D | LOG_R | |
|--------|-------|-----------|----------------------|---------|--------|-------|-----------|-----------|---------|------------|----------|---------|---------|-------|--------|--------|
| 1 | 8721 | wisconsin | 2020-11-04T09:42:30Z | 3106358 | 85 | 0.480 | 0.492 | 1501433 | 1570991 | 2020-11-04 | 09:42:30 | 1.0061 | 149379 | 25163 | 5.1563 | 4.4008 |

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Previous Record

| REGNUM | STATE | TIMESTAMP | VOTES | EEVP | TRUMPO | BIDENJ | TRUMP_CUM | BIDEN_CUM | DATE | TIME | DR_RATIO | D_VOTES | R_VOTES | LOG_D | LOG_R | |
|--------|-------|-----------|----------------------|---------|--------|--------|-----------|-----------|---------|------------|----------|---------|---------|-------|--------|--------|
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P-Test (two-sample proportion test) shows that there is a 0.0% probability that this vote drop came from a random population of Wisconsin votes as shown in the outcome screenshot below. As shown above, Biden suddenly gets 143,379 votes out of 168,542 or 85%, which itself is outside any percentage before or after.

The screenshot shows a 'Proportion Tests' window with the following data and results:

| Sample | np | n |
|--------|-----------|-----------|
| 1 | 143,379 | 168,542 |
| 2 | 1,628,592 | 3,297,473 |

Confidence: 99%

Two-Sample Proportion Test

| Statistic | Sample 1 | Sample 2 |
|-----------|-----------|-------------|
| p | 0.85070 | 0.49389 |
| np | 143,379.0 | 1,628,592.0 |
| n | 168,542 | 3,297,473 |

99.00% Exact CI for n1: 0.84846 to 0.85293
n2: 0.49318 to 0.49460

Exact Test for: n1 = n2
Fisher Exact p-value (two-tailed) = 0.000+

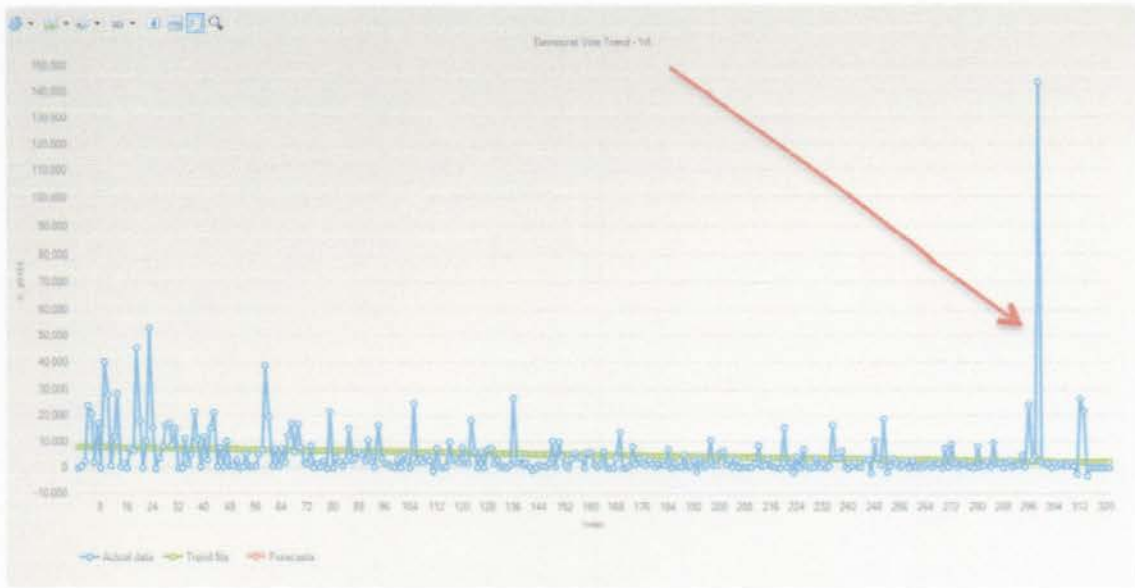
The red arrow points to the p-value result '0.000+'.

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

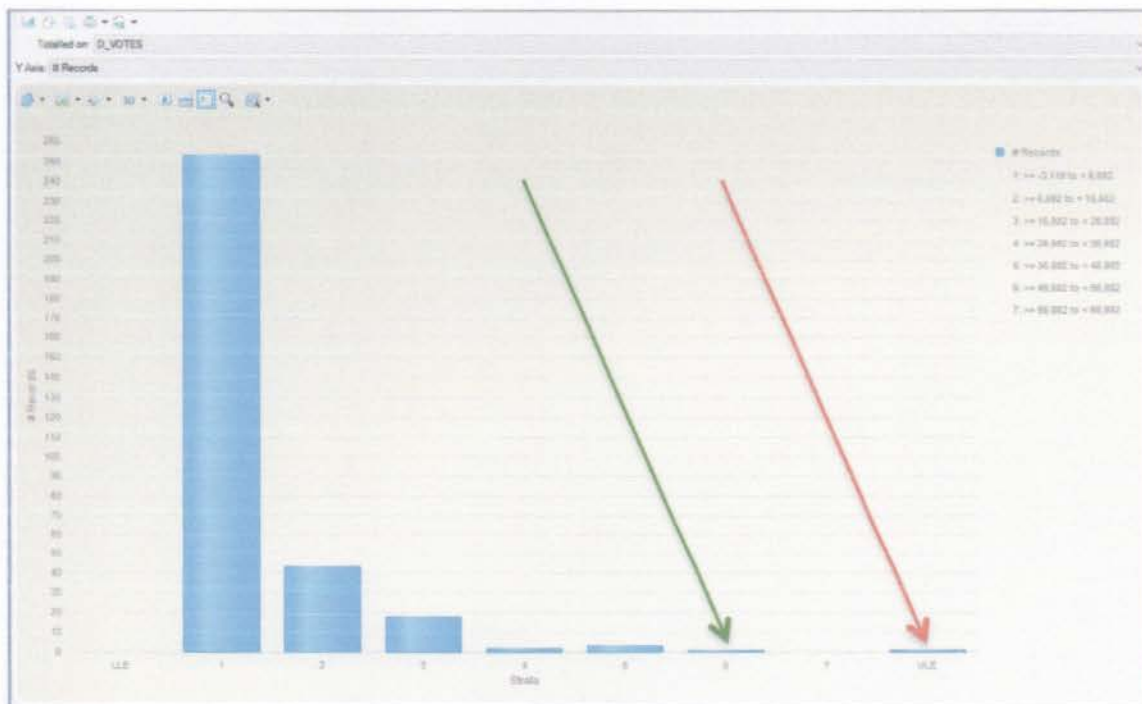
| | |
|--------|-----------|
| Biden: | 1,485,573 |
| Trump: | 1,584,004 |

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

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



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



All of these are clear indications of fraud.

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

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

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

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



Preview Record

| PRECNUM | STATE | TIMESTAMP | VOTES | EEVP | TRUMP | BIDEN | TRUMP_CUM | BIDEN_CUM | DATE | TIME | SR_NUM | EL_VOTES | R_VOTES | LOG_ID | LOG_R |
|---------|----------------|----------------------|--------|------|-------|-------|-----------|-----------|------------|----------|--------|----------|---------|--------|--------|
| 1 | 3721 wisconsin | 2020-11-04T03:43:05Z | 318698 | 29 | 0.490 | 0.493 | 158163 | 157093 | 2020-11-04 | 03:43:23 | 10001 | 143379 | 25163 | 3.5583 | 4.4008 |

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

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

Scytl/jseats

forked from pau-minoves/jseats

<> Code Pull requests Actions Projects Security Insights

devel - jseats / src / test / resources / stories / cli /

This branch is even with pau-minoves:devel.

pau-minoves config method and rally serialization, complete CLI story

..

| | |
|---|---|
| create-absolute-majority-result.params | config method and rally serialization, complete CLI story |
| load-config-and-do-dhondt-result.params | config method and rally serialization, complete CLI story |
| load-config-and-replace-tally-result.params | config method and rally serialization, complete CLI story |
| tally.3.xml | config method and rally serialization, complete CLI story |

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

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

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

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

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


 Russell James Ramsland, Jr.

11/30/2020
 Date



Iranian Advanced Persistent Threat Actor Identified Obtaining Voter Registration Data

SUMMARY

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

This joint cybersecurity advisory was coauthored by the Cybersecurity and Infrastructure Security Agency (CISA) and the Federal Bureau of Investigation (FBI). CISA and the FBI are aware of an Iranian advanced persistent threat (APT) actor targeting U.S. state websites—to include election websites. CISA and the FBI assess this actor is responsible for the mass dissemination of voter intimidation emails to U.S. citizens and the dissemination of U.S. election-related disinformation in mid-October 2020.¹ (Reference FBI FLASH message ME-000138-TT, disseminated October 29, 2020). Further evaluation by CISA and the FBI has identified the targeting of U.S. state election websites was an intentional effort to influence and interfere with the 2020 U.S. presidential election.

TECHNICAL DETAILS

Analysis by CISA and the FBI indicates this actor scanned state websites, to include state election websites, between September 20 and September 28, 2020, with the Acunetix vulnerability scanner (*Active Scanning: Vulnerability Scanning* [T1595.002]). Acunetix is a widely used and legitimate web scanner, which has been used by threat actors for nefarious purposes. Organizations that do not regularly use Acunetix should monitor their logs for any activity from the program that originates from IP addresses provided in this advisory and consider it malicious reconnaissance behavior.

Additionally, CISA and the FBI observed this actor attempting to exploit websites to obtain copies of voter registration data between September 29 and October 17, 2020 (*Exploit Public-Facing*

¹ See FBI FLASH, ME-000138-TT, disseminated 10/29/20, <https://www.ic3.gov/Media/News/2020/201030.pdf>. This disinformation (hereinafter, “the propaganda video”) was in the form of a video purporting to misattribute the activity to a U.S. domestic actor and implies that individuals could cast fraudulent ballots, even from overseas. <https://www.odni.gov/index.php/newsroom/press-releases/item/2162-dni-john-ratcliffe-s-remarks-at-press-conference-on-election-security>.

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

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Application [T1190]). This includes attempted exploitation of known vulnerabilities, directory traversal, Structured Query Language (SQL) injection, web shell uploads, and leveraging unique flaws in websites.

CISA and the FBI can confirm that the actor successfully obtained voter registration data in at least one state. The access of voter registration data appeared to involve the abuse of website misconfigurations and a scripted process using the cURL tool to iterate through voter records. A review of the records that were copied and obtained reveals the information was used in the propaganda video.

CISA and FBI analysis of identified activity against state websites, including state election websites, referenced in this product cannot all be fully attributed to this Iranian APT actor. FBI analysis of the Iranian APT actor's activity has identified targeting of U.S. elections' infrastructure (*Compromise Infrastructure* [T1584]) within a similar timeframe, use of IP addresses and IP ranges – including numerous virtual private network (VPN) service exit nodes – which correlate to this Iran APT actor (*Gather Victim Host Information* [T1592]), and other investigative information.

Reconnaissance

The FBI has information indicating this Iran-based actor attempted to access PDF documents from state voter sites using advanced open-source queries (*Search Open Websites and Domains* [T1539]). The actor demonstrated interest in PDFs hosted on URLs with the words “vote” or “voter” and “registration.” The FBI identified queries of URLs for election-related sites.

The FBI also has information indicating the actor researched the following information in a suspected attempt to further their efforts to survey and exploit state election websites.

- YOURLS exploit
- Bypassing ModSecurity Web Application Firewall
- Detecting Web Application Firewalls
- SQLmap tool

Acunetix Scanning

CISA's analysis identified the scanning of multiple entities by the Acunetix Web Vulnerability scanning platform between September 20 and September 28, 2020 (*Active Scanning: Vulnerability Scanning* [T1595.002]).

The actor used the scanner to attempt SQL injection into various fields in `/registration/registration/details` with status codes 404 or 500:

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



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

Requests

The actor used the following requests associated with this scanning activity.

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

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

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

User Agents Observed

CISA and FBI have observed the following user agents associated with this scanning activity.

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

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

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

Exfiltration

Obtaining Voter Registration Data

Following the review of web server access logs, CISA analysts, in coordination with the FBI, found instances of the cURL and FDM User Agents sending GET requests to a web resource associated with voter registration data. The activity occurred between September 29 and October 17, 2020. Suspected scripted activity submitted several hundred thousand queries iterating through voter

identification values, and retrieving results with varying levels of success [*Gather Victim Identity Information* ([T1589](#))]. A sample of the records identified by the FBI reveals they match information in the aforementioned propaganda video.

Requests

The actor used the following requests.

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

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

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

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

Note: incrementing `voterid` values in `cs_uri_query` field

User Agents

CISA and FBI have observed the following user agents.

```
FDM+3.x
```

```
curl/7.55.1
```

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

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

See figure 1 below for a timeline of the actor's malicious activity.

TECHNICAL FINDINGS

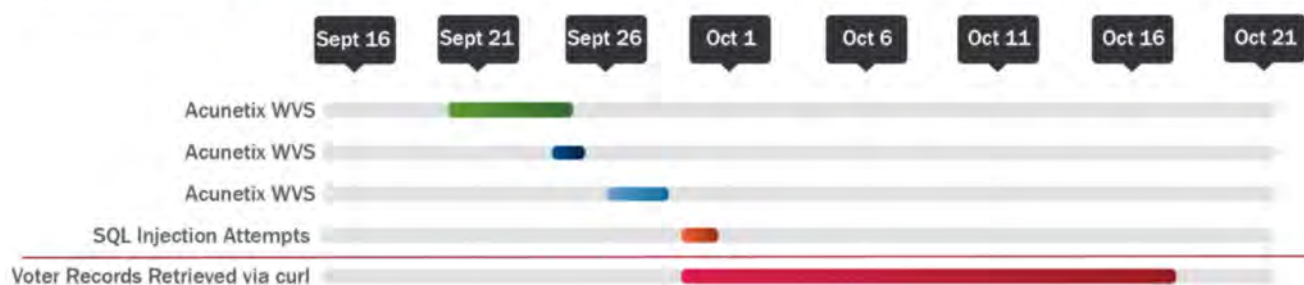


Figure 1: Overview of malicious activity

MITIGATIONS

Detection

Acunetix Scanning

Organizations can identify Acunetix scanning activity by using the following keywords while performing log analysis.

- `$acunetix`
- `acunetix_wvs_security_test`

Indicators of Compromise

For a downloadable copy of IOCs, see [AA20-304A.stix](#).

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

The following IPs have been associated with this activity.

- 102.129.239[.]185 (Acunetix Scanning)
- 143.244.38[.]60 (Acunetix Scanning and cURL requests)
- 45.139.49[.]228 (Acunetix Scanning)
- 156.146.54[.]90 (Acunetix Scanning)
- 109.202.111[.]236 (cURL requests)
- 185.77.248[.]17 (cURL requests)
- 217.138.211[.]249 (cURL requests)
- 217.146.82[.]207 (cURL requests)
- 37.235.103[.]85 (cURL requests)
- 37.235.98[.]64 (cURL requests)
- 70.32.5[.]96 (cURL requests)

- 70.32.6[.]20 (cURL requests)
- 70.32.6[.]8 (cURL requests)
- 70.32.6[.]97 (cURL requests)
- 70.32.6[.]98 (cURL requests)
- 77.243.191[.]21 (cURL requests and FDM+3.x (Free Download Manager v3) enumeration/iteration)
- 92.223.89[.]73 (cURL requests)

CISA and the FBI are aware the following IOCs have been used by this Iran-based actor. These IP addresses facilitated the mass dissemination of voter intimidation email messages on October 20, 2020.

- 195.181.170[.]244 (Observed September 30 and October 20, 2020)
- 102.129.239[.]185 (Observed September 30, 2020)
- 104.206.13[.]27 (Observed September 30, 2020)
- 154.16.93[.]125 (Observed September 30, 2020)
- 185.191.207[.]169 (Observed September 30, 2020)
- 185.191.207[.]52 (Observed September 30, 2020)
- 194.127.172[.]98 (Observed September 30, 2020)
- 194.35.233[.]83 (Observed September 30, 2020)
- 198.147.23[.]147 (Observed September 30, 2020)
- 198.16.66[.]139 (Observed September 30, 2020)
- 212.102.45[.]3 (Observed September 30, 2020)
- 212.102.45[.]58 (Observed September 30, 2020)
- 31.168.98[.]73 (Observed September 30, 2020)
- 37.120.204[.]156 (Observed September 30, 2020)
- 5.160.253[.]50 (Observed September 30, 2020)
- 5.253.204[.]74 (Observed September 30, 2020)
- 64.44.81[.]68 (Observed September 30, 2020)
- 84.17.45[.]218 (Observed September 30, 2020)
- 89.187.182[.]106 (Observed September 30, 2020)
- 89.187.182[.]111 (Observed September 30, 2020)
- 89.34.98[.]114 (Observed September 30, 2020)
- 89.44.201[.]211 (Observed September 30, 2020)

Recommendations

The following list provides recommended self-protection mitigation strategies against cyber techniques used by advanced persistent threat actors:

- Validate input as a method of sanitizing untrusted input submitted by web application users. Validating input can significantly reduce the probability of successful exploitation by providing

protection against security flaws in web applications. The types of attacks possibly prevented include SQL injection, Cross Site Scripting (XSS), and command injection.

- Audit your network for systems using Remote Desktop Protocol (RDP) and other internet-facing services. Disable unnecessary services and install available patches for the services in use. Users may need to work with their technology vendors to confirm that patches will not affect system processes.
- Verify all cloud-based virtual machine instances with a public IP, and avoid using open RDP ports, unless there is a valid need. Place any system with an open RDP port behind a firewall and require users to use a VPN to access it through the firewall.
- Enable strong password requirements and account lockout policies to defend against brute-force attacks.
- Apply multi-factor authentication, when possible.
- Maintain a good information back-up strategy by routinely backing up all critical data and system configuration information on a separate device. Store the backups offline, verify their integrity, and verify the restoration process.
- Enable logging and ensure logging mechanisms capture RDP logins. Keep logs for a minimum of 90 days and review them regularly to detect intrusion attempts.
- When creating cloud-based virtual machines, adhere to the cloud provider's best practices for remote access.
- Ensure third parties that require RDP access follow internal remote access policies.
- Minimize network exposure for all control system devices. Where possible, critical devices should not have RDP enabled.
- Regulate and limit external to internal RDP connections. When external access to internal resources is required, use secure methods, such as a VPNs. However, recognize the security of VPNs matches the security of the connected devices.
- Use security features provided by social media platforms; use [strong passwords](#), change passwords frequently, and use a different password for each social media account.
- See CISA's Tip on [Best Practices for Securing Election Systems](#) for more information.

General Mitigations

Keep applications and systems updated and patched

Apply all available software updates and patches and automate this process to the greatest extent possible (e.g., by using an update service provided directly from the vendor). Automating updates and patches is critical because of the speed of threat actors to create new exploits following the release of a patch. These "N-day" exploits can be as damaging as zero-day exploits. Ensure the authenticity and integrity of vendor updates by using signed updates delivered over protected links. Without the rapid and thorough application of patches, threat actors can operate inside a defender's patch cycle.²

² NSA "NSA'S Top Ten Cybersecurity Mitigation Strategies" <https://www.nsa.gov/Portals/70/documents/what-we-do/cybersecurity/professional-resources/csi-nas-top10-cybersecurity-mitigation-strategies.pdf>

Additionally, use tools (e.g., the OWASP Dependency-Check Project tool³) to identify the publicly known vulnerabilities in third-party libraries depended upon by the application.

Scan web applications for SQL injection and other common web vulnerabilities

Implement a plan to scan public-facing web servers for common web vulnerabilities (e.g., SQL injection, cross-site scripting) by using a commercial web application vulnerability scanner in combination with a source code scanner.⁴ Fixing or patching vulnerabilities after they are identified is especially crucial for networks hosting older web applications. As sites get older, more vulnerabilities are discovered and exposed.

Deploy a web application firewall

Deploy a web application firewall (WAF) to prevent invalid input attacks and other attacks destined for the web application. WAFs are intrusion/detection/prevention devices that inspect each web request made to and from the web application to determine if the request is malicious. Some WAFs install on the host system and others are dedicated devices that sit in front of the web application. WAFs also weaken the effectiveness of automated web vulnerability scanning tools.

Deploy techniques to protect against web shells

Patch web application vulnerabilities or fix configuration weaknesses that allow web shell attacks, and follow guidance on detecting and preventing web shell malware.⁵ Malicious cyber actors often deploy web shells—software that can enable remote administration—on a victim's web server. Malicious cyber actors can use web shells to execute arbitrary system commands commonly sent over HTTP or HTTPS. Attackers often create web shells by adding or modifying a file in an existing web application. Web shells provide attackers with persistent access to a compromised network using communications channels disguised to blend in with legitimate traffic. Web shell malware is a long-standing, pervasive threat that continues to evade many security tools.

Use multi-factor authentication for administrator accounts

Prioritize protection for accounts with elevated privileges, remote access, or used on high-value assets.⁶ Use physical token-based authentication systems to supplement knowledge-based factors such as passwords and personal identification numbers (PINs).⁷ Organizations should migrate away from single-factor authentication, such as password-based systems, which are subject to poor user

³ <https://owasp.org/www-project-dependency-check/>

⁴ NSA "Defending Against the Exploitation of SQL Vulnerabilities to Compromise a Network" <https://apps.nsa.gov/iaarchive/library/ia-guidance/tech-briefs/defending-against-the-exploitation-of-sql-vulnerabilities-to-cfm>

⁵ NSA & ASD "CyberSecurity Information: Detect and Prevent Web Shell Malware" <https://media.defense.gov/2020/Jun/09/2002313081/-1/-1/0/CSI-DETECT-AND-PREVENT-WEB-SHELL-MALWARE-20200422.PDF>

⁶ <https://us-cert.cisa.gov/cdm/event/Identifying-and-Protecting-High-Value-Assets-Closer-Look-Governance-Needs-HVAs>

⁷ NSA "NSA'S Top Ten Cybersecurity Mitigation Strategies" <https://www.nsa.gov/Portals/70/documents/what-we-do/cybersecurity/professional-resources/csi-nas-top10-cybersecurity-mitigation-strategies.pdf>

choices and more susceptible to credential theft, forgery, and password reuse across multiple systems.

Remediate critical web application security risks

First, identify and remediate critical web application security risks. Next, move on to other less critical vulnerabilities. Follow available guidance on securing web applications.^{8,9,10}

How do I respond to unauthorized access to election-related systems?

Implement your security incident response and business continuity plan

It may take time for your organization's IT professionals to isolate and remove threats to your systems and restore normal operations. In the meantime, take steps to maintain your organization's essential functions according to your business continuity plan. Organizations should maintain and regularly test backup plans, disaster recovery plans, and business continuity procedures.

Contact CISA or law enforcement immediately

To report an intrusion and to request incident response resources or technical assistance, contact CISA (Central@cisa.gov or 888-282-0870) or the FBI through a local field office or the FBI's Cyber Division (CyWatch@ic.fbi.gov or 855-292-3937).

RESOURCES

- CISA Tip: [Best Practices for Securing Election Systems](#)
- CISA Tip: [Securing Voter Registration Data](#)
- CISA Tip: [Website Security](#)
- CISA Tip: [Avoiding Social Engineering and Phishing Attacks](#)
- CISA Tip: [Securing Network Infrastructure Devices](#)
- Joint Advisory: [Technical Approaches to Uncovering and Remediating Malicious Activity](#)
- CISA Insights: [Actions to Counter Email-Based Attacks on Election-related Entities](#)
- FBI and CISA Public Service Announcement (PSA): [Spoofed Internet Domains and Email Accounts Pose Cyber and Disinformation Risks to Voters](#)
- FBI and CISA PSA: [Foreign Actors Likely to Use Online Journals to Spread Disinformation Regarding 2020 Elections](#)
- FBI and CISA PSA: [Distributed Denial of Service Attacks Could Hinder Access to Voting Information, Would Not Prevent Voting](#)
- FBI and CISA PSA: [False Claims of Hacked Voter Information Likely Intended to Cast Doubt on Legitimacy of U.S. Elections](#) FBI and CISA PSA: [Cyber Threats to Voting Processes Could Slow But Not Prevent Voting](#)

⁸ NSA "Building Web Applications – Security for Developers" <https://apps.nsa.gov/iaarchive/library/ia-guidance/security-tips/building-web-applications-security-recommendations-for.cfm>

⁹ <https://owasp.org/www-project-top-ten/>

¹⁰

https://cwe.mitre.org/top25/archive/2020/2020_cwe_top25.html

- FBI and CISA PSA: [Foreign Actors and Cybercriminals Likely to Spread Disinformation Regarding 2020 Election Results](#)

Declaration of [REDACTED] Ph.D

November 30, 2020

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

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

Signature:

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

1 Impact of Fraud on the Election

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

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

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

2 Statistical Model

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

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

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

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

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

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

2.1 Fraud Model

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

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

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

2.2 Posterior Probability of Fraud Model

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

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

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

3 Analysis of Absentee Ballots in the 2020 Election

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

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

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

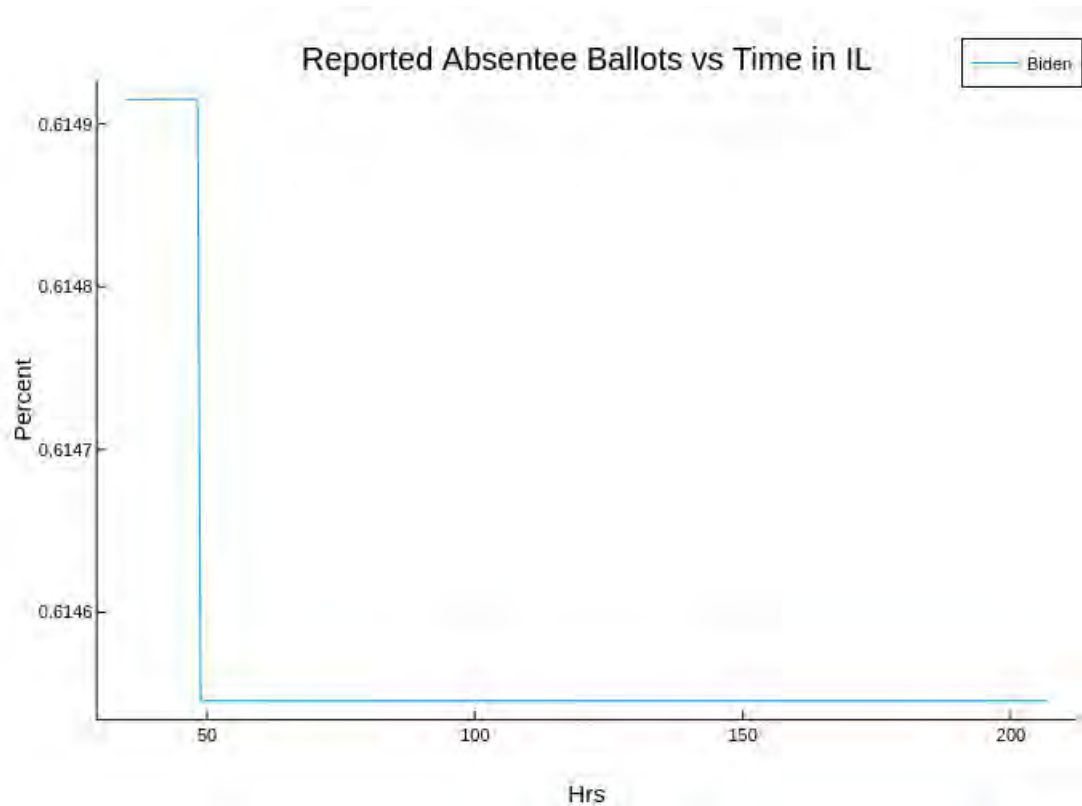


Figure 1: Reported Biden Fraction In Illinois vs Time

3.1 Control Case Illinois

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

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

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

3.2 Analysis of Georgia Absentee Ballots

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

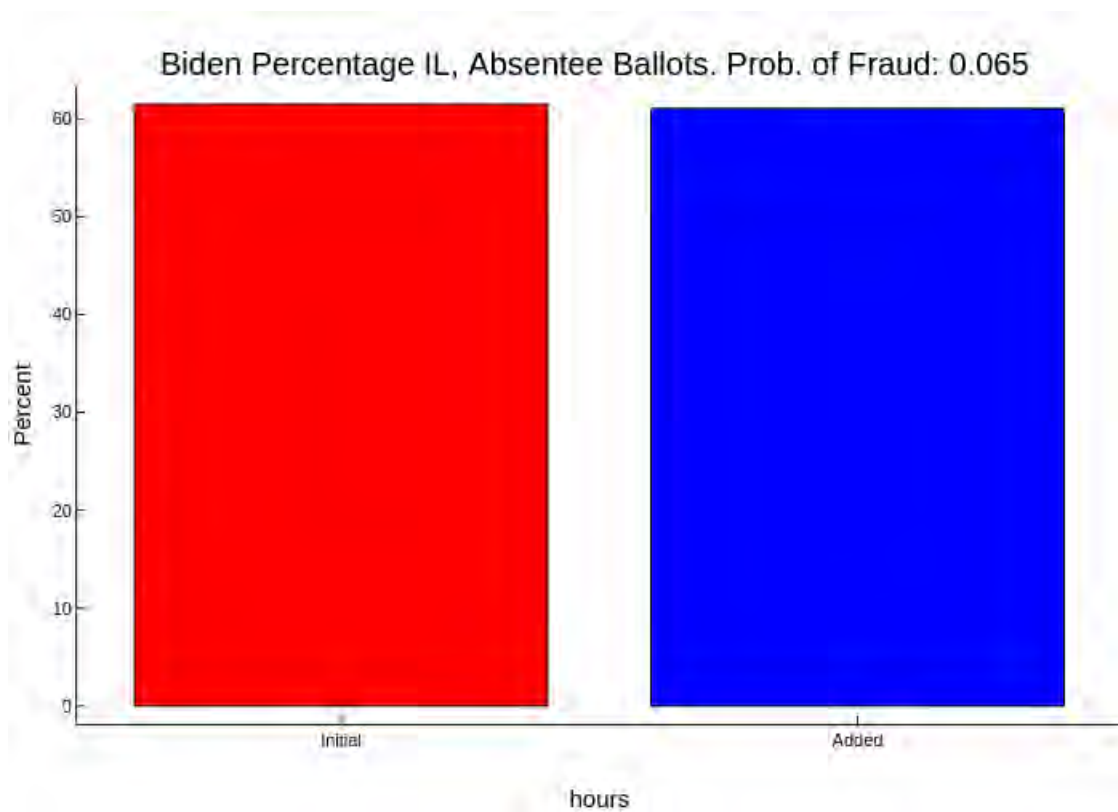


Figure 2: Before and Added Biden Fraction

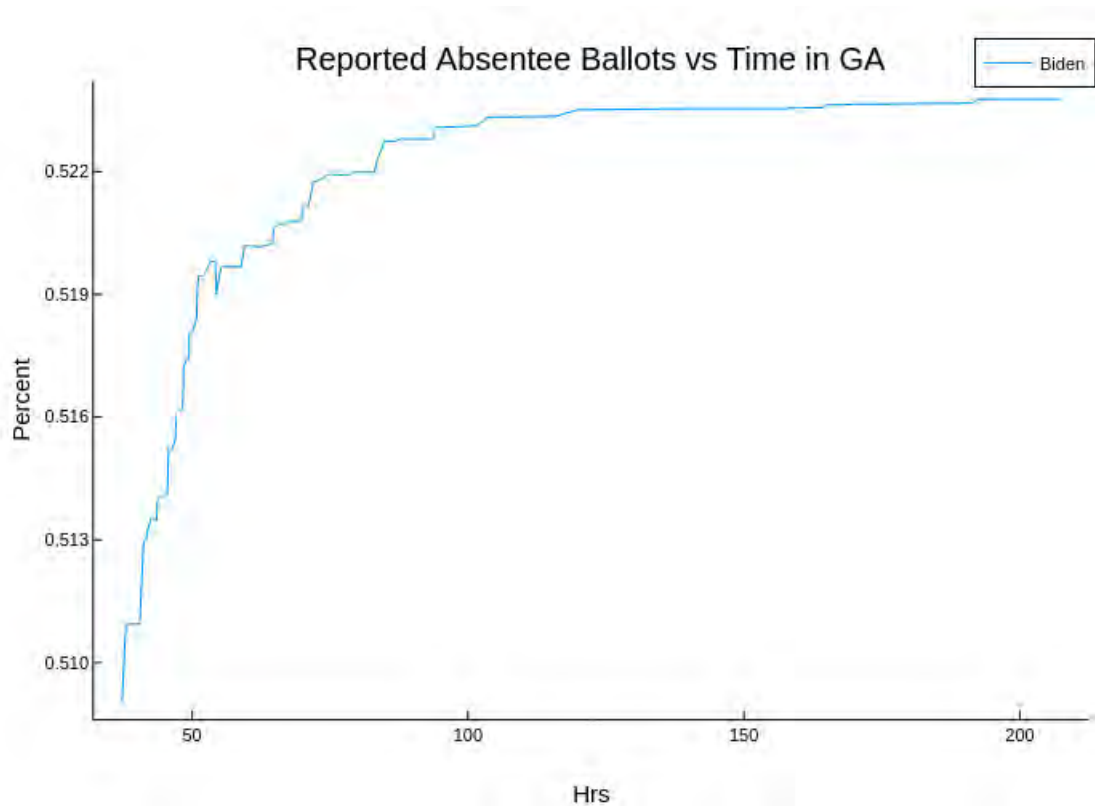


Figure 3: Georgia Absentee Ballots vs Time: (Biden Fraction)

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

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

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

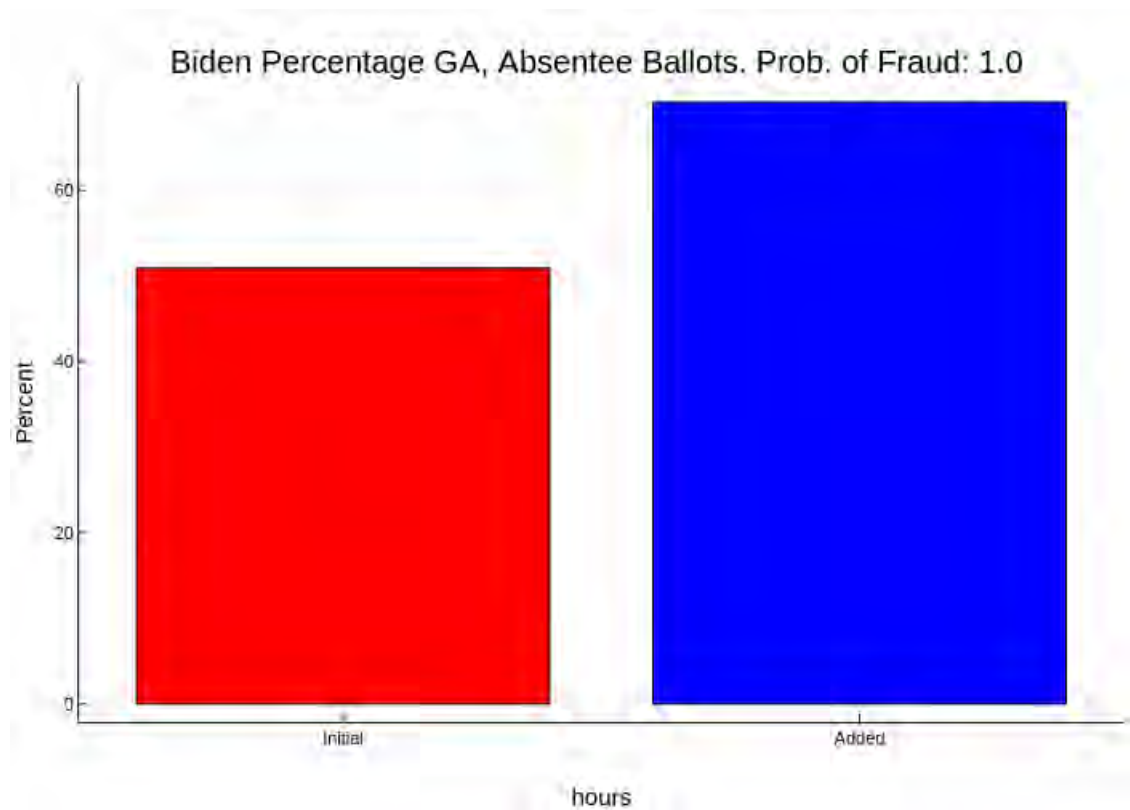


Figure 4: Before and After Biden Fraction in Georgia

then we have,

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

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

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

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

3.3 Analysis of Pennsylvania Absentee Ballots

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

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

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

4 Analysis of Milwaukee County in Wisconsin

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

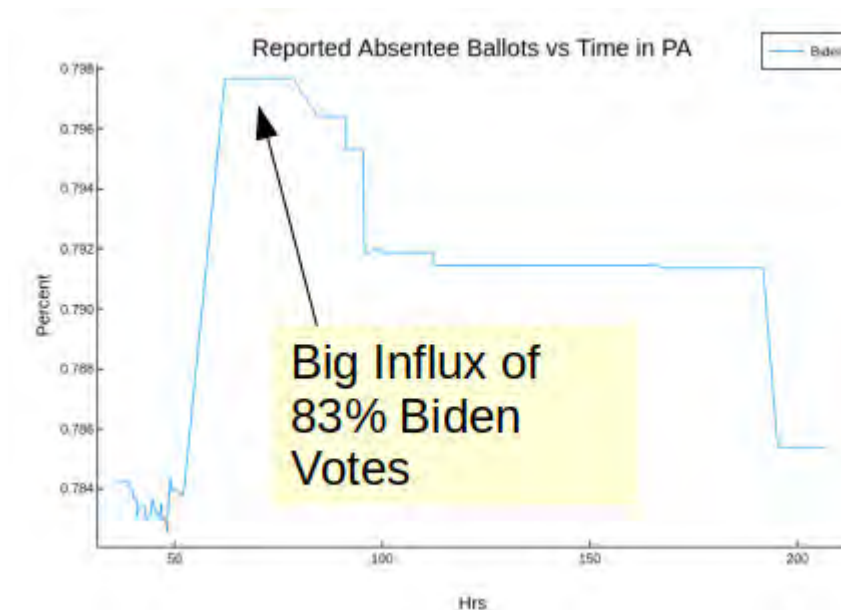


Figure 5: Pennsylvania Absentee Ballots vs Time: (Biden Fraction)

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

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

4.1 Analysis of Milwaukee County Democrat results

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

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

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

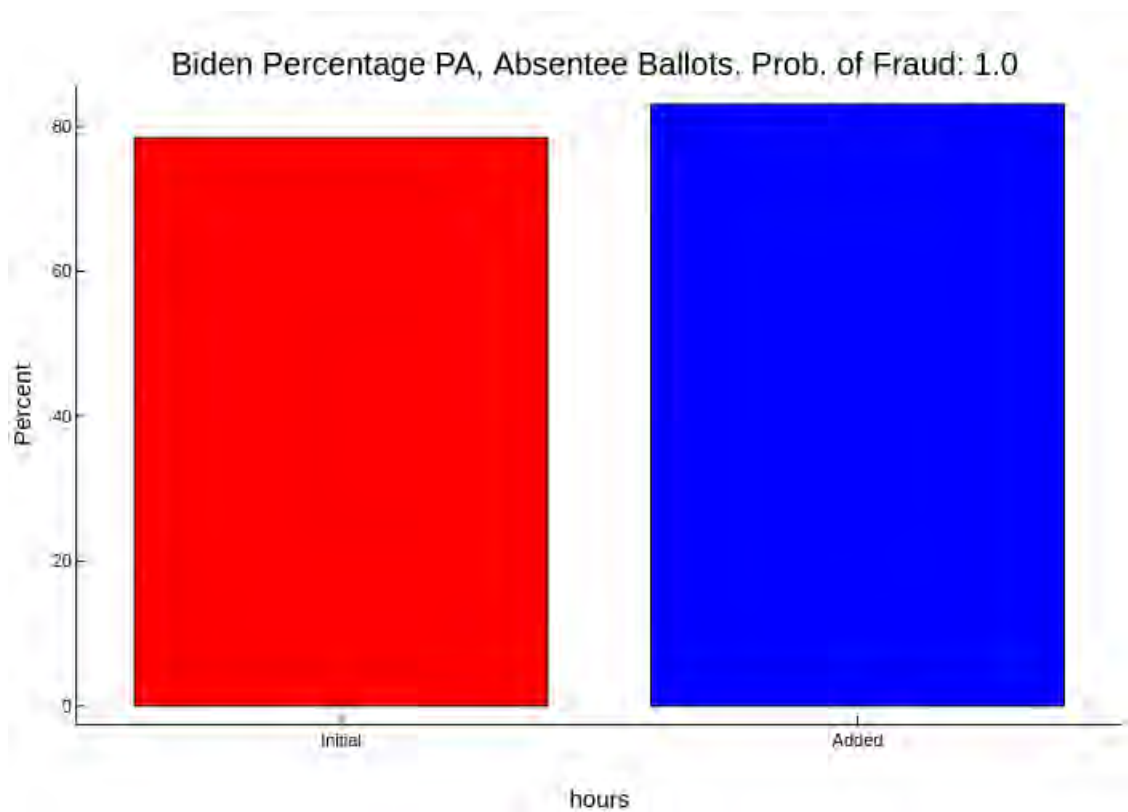


Figure 6: Before and After Biden Fraction in Pennsylvania

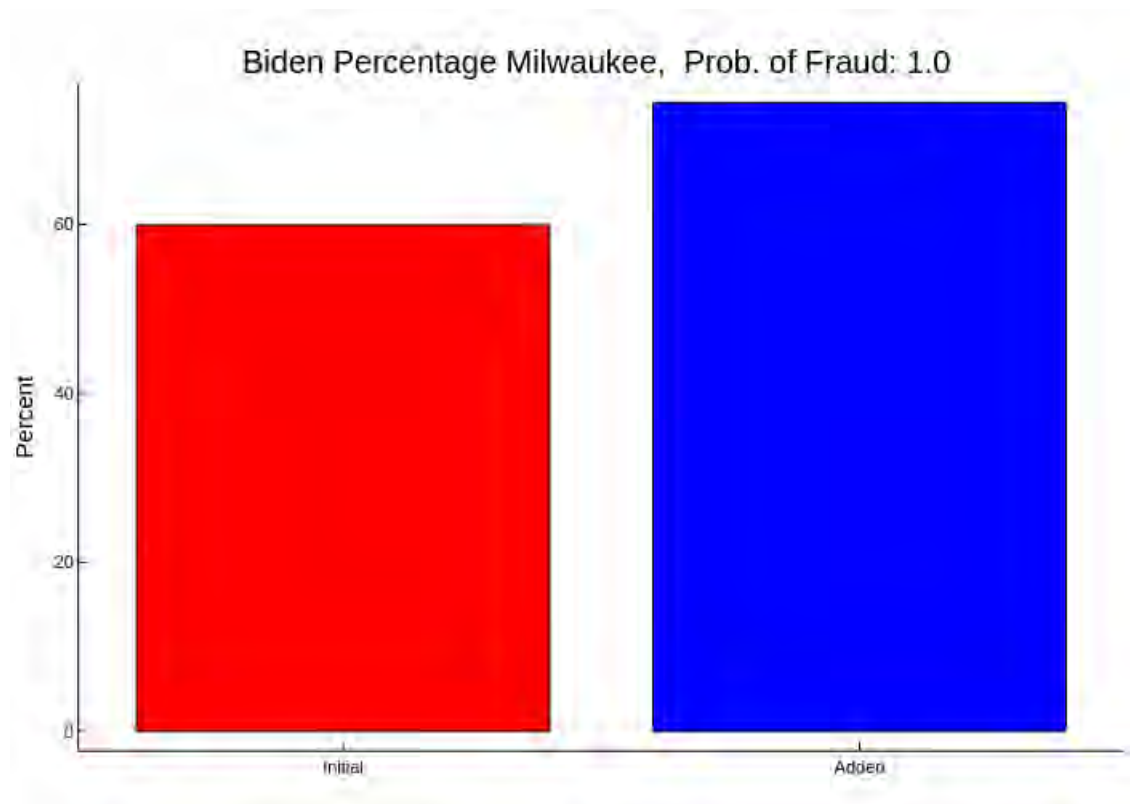


Figure 7: Before and After Democrat Fraction in Milwaukee

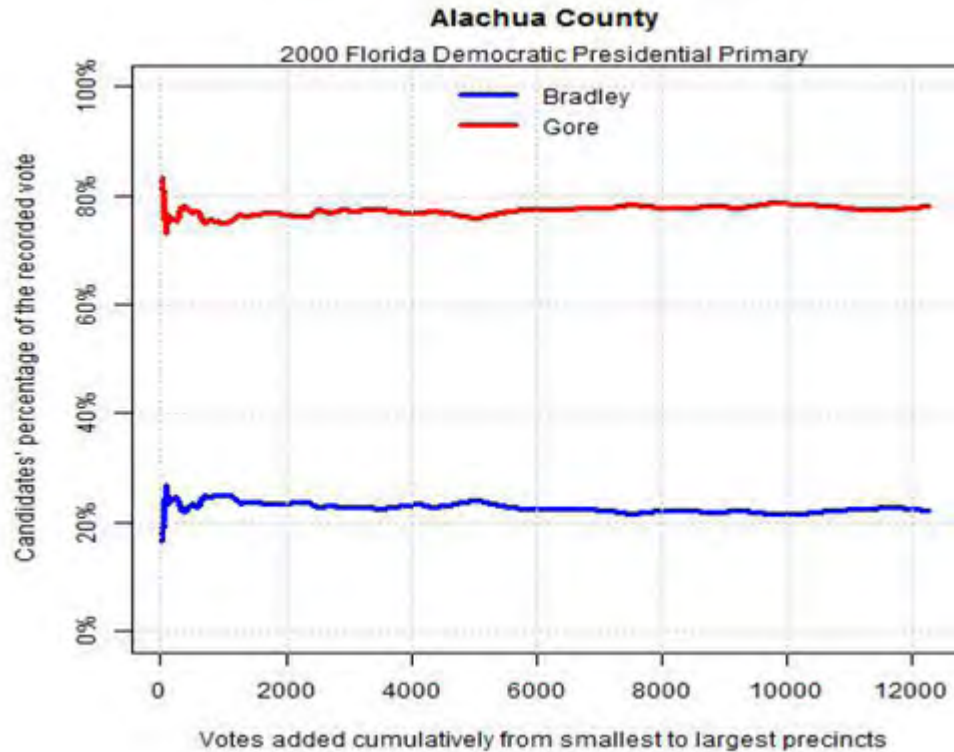


Figure 8: Baseline Cumulative Fractions Sorted by Precinct Size

42365 votes and remove 42365 votes from Biden.

4.2 Candidate Percentages Sorted by Ward Size

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

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

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

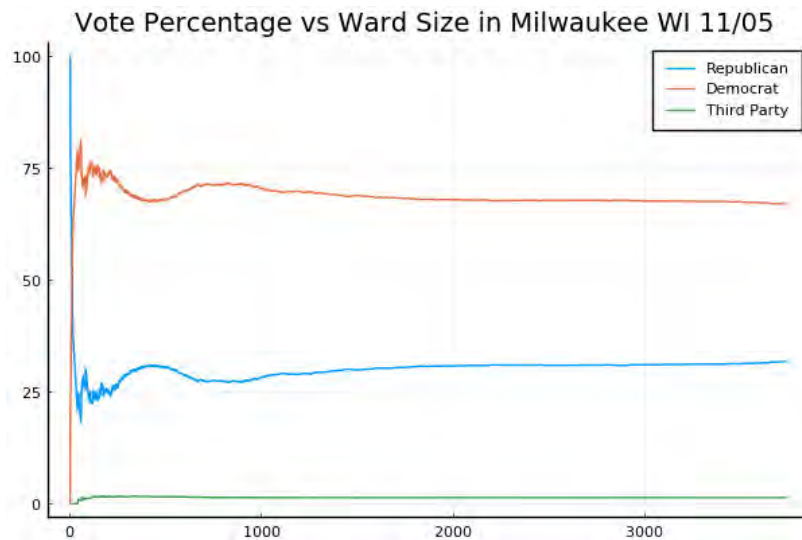


Figure 9: Milwaukee Democrat Ballots Percentage vs Ward Size

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

5 Analysis of Third Party Vote Count

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

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

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

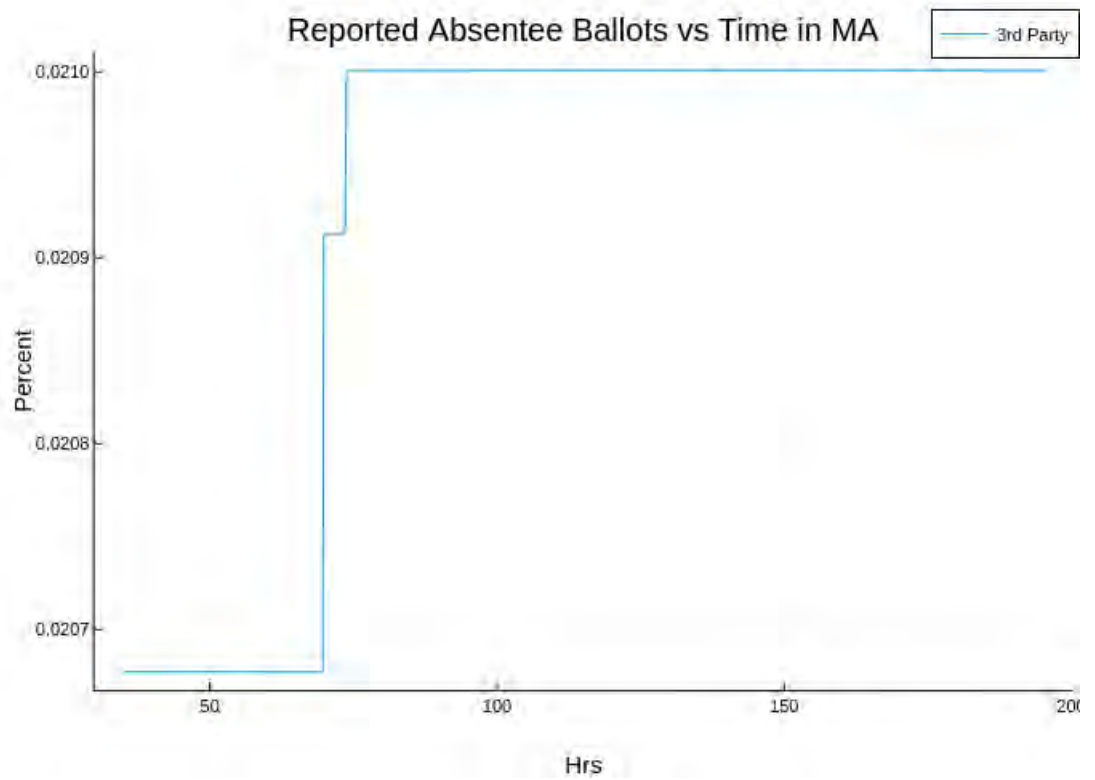


Figure 10: MA 3rd Party Absentee Votes vs Time

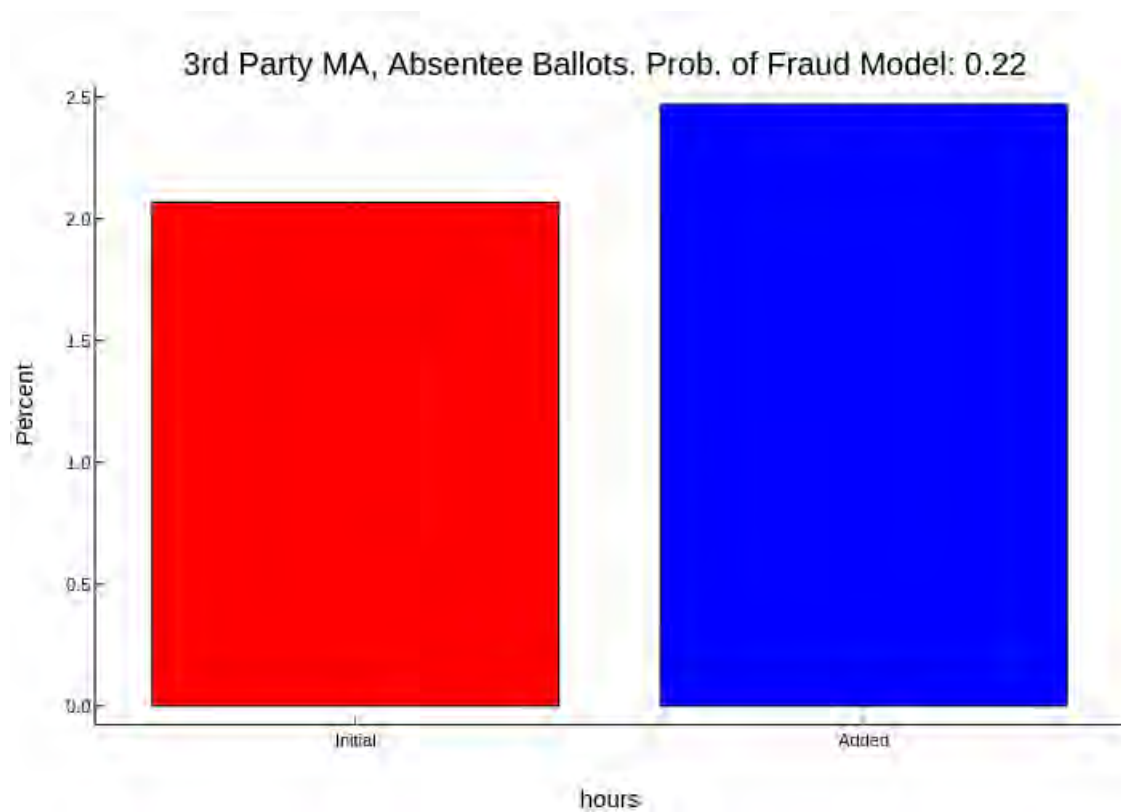


Figure 11: MA 3rd Party Percentage Initial and Added

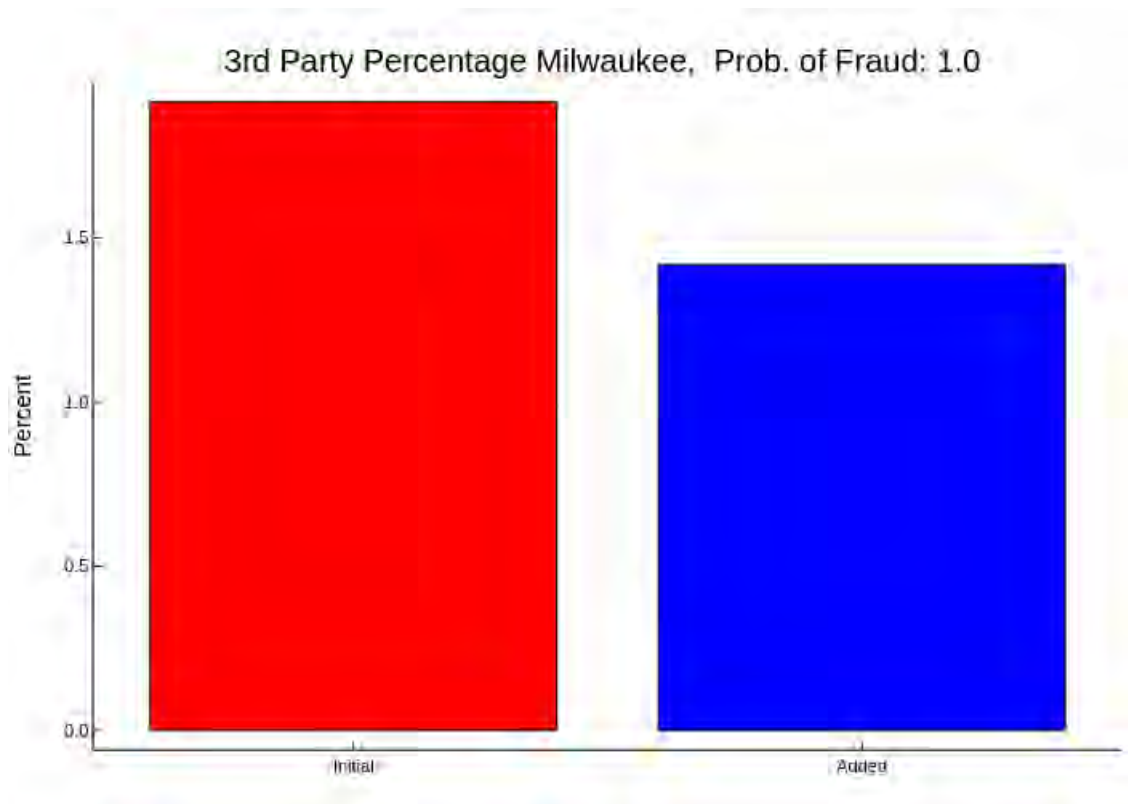


Figure 12: Milwaukee 3rd Party Percentages between Wednesday and Added

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

6 Analysis of Fulton and DeKalb Counties in Georgia

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

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

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

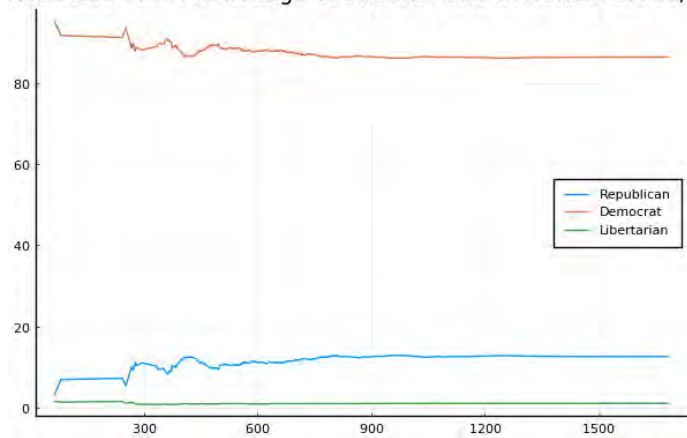


Figure 13: Dekalb County Absentee Ballots: Percentages vs Precinct Size

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

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

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

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

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

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

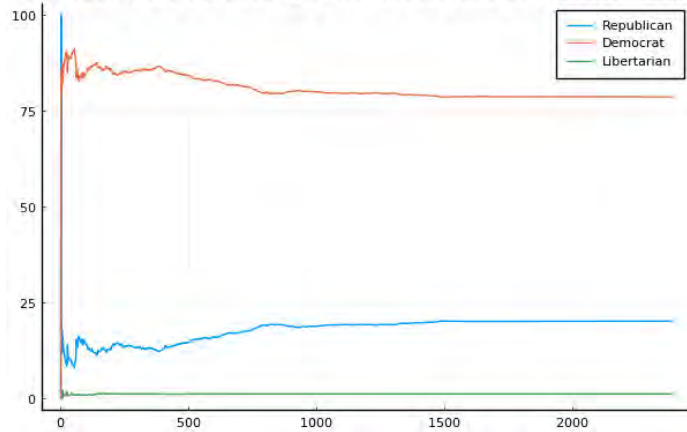


Figure 14: Fulton County Absentee Ballots: Percentages vs Precinct Size

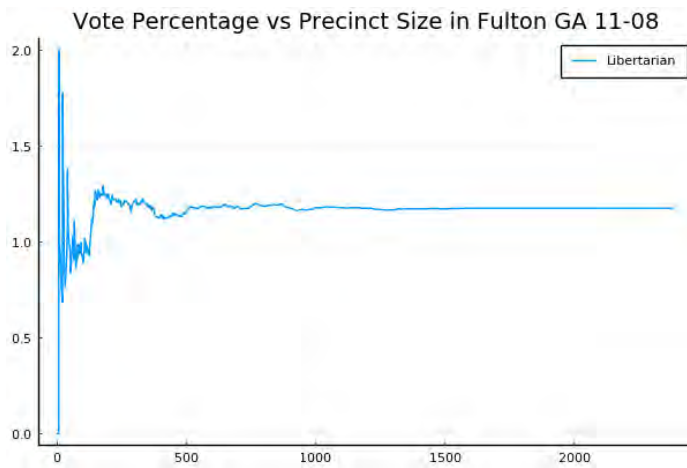


Figure 15: Fulton County Absentee Ballots: Libertarian Percentage vs Precinct Size

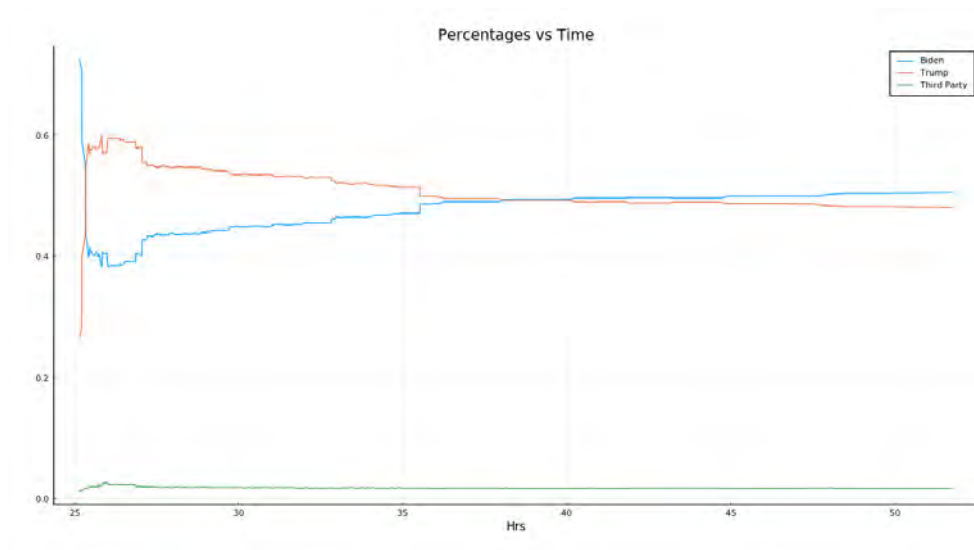


Figure 16: Michigan Vote Percentage vs Time

7 Michigan Analysis

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

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

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

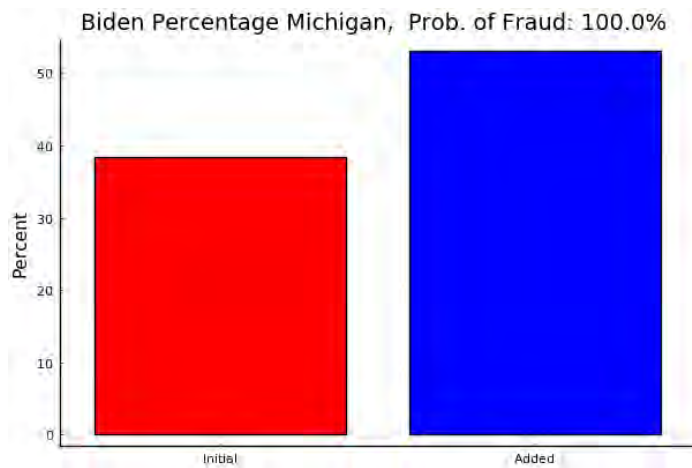


Figure 17: Biden Percentage Before and Added

References

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

CIVIL COVER SHEET

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

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

I. (a) PLAINTIFFS

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

DEFENDANTS

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

| CONTRACT | TORTS | FORFEITURE/PENALTY | BANKRUPTCY | OTHER STATUTES |
|---|--|---|--|---|
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| REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property | CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement | | | |

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

- ☐ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:

VII. REQUESTED IN COMPLAINT:

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

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**Authority For Civil Cover Sheet**

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

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

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

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

**WILLIAM FEEHAN and DERRICK VAN
ORDEN,**

CASE NO. 2:20-cv-1771

Plaintiffs.

v.

**WISCONSIN ELECTIONS COMMISSION,
and its members ANN S. JACOBS, MARLC
L. THOMSEN, MARGE BOSTELMAN,
JULIE M. GLANCEY, DEAN HUDSON,
ROBERT F. SPINDELL, JR., in their official
capacities, GOVERNOR TONY EVERS, in
his official capacity,**

Defendants.

**PLAINTIFFS' MOTION FOR
DECLARATORY, EMERGENCY, AND PERMANENT
INJUNCTIVE RELIEF**

Pursuant to FRCP 65 and Civil L. R. 7, COMES NOW Plaintiffs, William Feehan and Derrick Van Orden, by and through their undersigned counsel, and file this Emergency Motion for Temporary Restraining Order and Permanent Injunctive Relief.

The specific relief requested by Plaintiff is set forth in the proposed form of Order is attached. The basis for the Motion is set forth in Plaintiffs Memorandum submitted in support.

Respectfully submitted, this 30th day of November 2020.

/s Sidney Powell*
Sidney Powell PC
Texas Bar No. 16209700

2911 Turtle Creek Blvd, Suite 300
Dallas, Texas 75219

*Application for admission forthcoming

CERTIFICATE OF SERVICE

This is to certify that I have on this day e-filed the foregoing Plaintiffs' Motion To File Affidavits Under Seal and For In Camera Review with the Clerk of Court using the CM/ECF system, and that I have delivered the filing to the Defendants by email and FedEx at the following addresses:

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

**WILLIAM FEEHAN and DERRICK VAN
ORDEN,**

CASE NO. 2:20-cv-1771

Plaintiffs.

v.

**WISCONSIN ELECTIONS COMMISSION,
and its members ANN S. JACOBS, MARLC
L. THOMSEN, MARGE BOSTELMAN,
JULIE M. GLANCEY, DEAN HUDSON,
ROBERT F. SPINDELL, JR., in their official
capacities, GOVERNOR TONY EVERS, in
his official capacity,**

Defendants.

**PLAINTIFFS' MEMORANDUM IN SUPPORT OF
MOTION FOR DECLARATORY, EMERGENCY, AND PERMANENT
INJUNCTIVE RELIEF**

FACTS

The facts relevant to this motion are set forth in the Complaint and its accompanying exhibits, all of which are respectfully incorporated herein by reference. We present only a summary.

After a general election and recount, Joe Biden has been declared the winner of Georgia's General Election for President by a difference of 20,585 votes, while Plaintiff Derrick Van Orden lost his race for the House of Representatives seat for Wisconsin's Third Congressional District

by approximately 10,000 votes. But the vote count certified by defendants on November 30, 2020 fails to recognize the votes are steeped in fraud. Tens of thousands of votes counted toward Mr. Biden's final tally were the product of fraudulent, illegal, ineligible and outright fictitious ballots. Plaintiffs support this claim through the evidence laid out in the Complaint which includes the following conclusions:

The Complaint details a pervasive pattern of illegal conduct by Defendants where they systematically ignored, or acted in direct contravention of, the express requirements of Wisconsin Election Code provisions specifically intended to prevent voter fraud such as voter Photo ID, witness, signature, eligibility and address verification requirements, supported by witness affidavits and even written guidance from Defendant Wisconsin Elections Commission ("WEC") instructing election workers to violate the Wisconsin Election Code. *See Compl.*, Section I.

In Section II and III of the Complaint, Plaintiffs demonstrate through statistical analysis of voting results and technical analysis of voting machines and software that each of several distinct categories of voting fraud or batches of fraudulent ballots were larger than Biden's 20,585 margin.

The Affidavit of Russell James Ramsland, Jr. first examines the widely reported and "statistically impossible" Biden "spike" on November 4 where Biden, trailing Trump by a few percent, suddenly received 143,379 votes in a single five-minute interval, causing his relatively flat vote tally to make a vertical jump up and over Trump to take the lead by about one percent. *See Compl.*, Ex. 17 ¶13. Another red flag identified by Mr. Ramsland is the historically unprecedented turnout levels (not just for Wisconsin, but for anywhere except for countries like North Korea): 69 out of 72 Wisconsin counties had "voter turnout figures higher than 80%, a

threshold generally considered to be the maximum expected,” 59 were above 90%, and two were nearly 200% or more. *Id.* ¶15. Mr. Ramsland concludes “to a reasonable degree of professional certainty” that the Biden spike included at least 119,430 illegal votes for Biden, while the total illegal votes from the fraudulent turnout figures was at least 384,085. *Id.* ¶14.

The Complaint provides testimony from several other experts who provided the estimates for illegal votes that should be discarded due to other categories of voting fraud:

- The report of William M. Briggs, Ph.D. finding that the average sum of two types of errors or fraud (either by Wisconsin election officials or third parties) – (1) absentee voters who were recorded as receiving ballots without requesting them and (2) absentee voters who returned ballots that were recorded as unreturned – was 29,594 votes (or nearly 31% of total). (*See id.*, Ex 2).
- Matt Braynard used the National Change of Address database to identify votes by persons that moved out of state or subsequently registered to vote in another state for the 2020 election, and found a total of 6,966 ineligible votes. (*See id.*, Ex 3).
- A separate analysis by Mr. Braynard of the likely number of votes that were improperly relying on the “indefinitely confined” exemption to voter ID to be 96,437 (*See id.*, Ex 3).
- Another expert witness, whose testimony has been redacted for his safety, estimates excess votes arising from the statistically significant outperformance of Dominion machines on behalf of Joe Biden to be 181,440. (*See id.*, Ex 3)

Thus each of these sources of fraudulent votes (with the exception of the still substantial number of illegal out-of-state voters) is larger than Biden’s margin of victory, and if any of these categories of illegal voters were thrown out, it would change the result of the election, and give President Trump a second term – and Plaintiff Van Order a first term as a Congressman.

Section III of the Complaint also provides testimony from experts regarding the security flaws in Wisconsin voting machines, in particular, Dominion Voting Systems (“Dominion”) that allow Dominion, as well domestic and foreign actors, to alter, destroy, manipulate or exfiltrate ballot and other voting data, and potentially to do so without a trace due to Dominion’s

unprotected logs. For example, the Complaint includes an analysis of the Dominion software system by a former US Military Intelligence expert concludes that the system and software have been accessible and were certainly compromised by rogue actors, such as Iran and China. (*See* Compl., Ex.105). By using servers and employees connected with rogue actors and hostile foreign influences combined with numerous easily discoverable leaked credentials, Dominion neglectfully allowed foreign adversaries to access data and intentionally provided access to their infrastructure in order to monitor and manipulate elections, including the most recent one in 2020. The substantial likelihood that hostile foreign governments, with or without active collusion or collaboration with the Defendants, is a separate and independent ground to grant the declaratory and injunctive relief requested in the Complaint and this Motion.

DISCUSSION

Plaintiffs Have Standing

Plaintiff William Feehan, is a registered Wisconsin voter and a nominee of the Republican Party to be a Presidential Elector on behalf of the State of Wisconsin. The Plaintiff Derrick Van Orden was the 2020 Republican nominee for Wisconsin's Third Congressional District Seat for the United States House of Representatives. As a candidate for elective office, each Plaintiff "have a cognizable interest in ensuring that the final vote tally reflects the legally valid votes cast," as "[a]n inaccurate vote tally is a concrete and particularized injury to candidates such as the Electors." *Carson v. Simon*, 978 F.3d 1051, 1057 (8th Cir. 2020) (affirming that Presidential Electors have Article III and prudential standing to challenge actions of Secretary of State in implementing or modifying State election laws); *see also McPherson v. Blacker*, 146 U.S. 1, 27 (1892); *Bush v. Palm Beach Cty. Canvassing Bd.*, 531 U.S. 70, 76 (2000) (per curiam).

Plaintiffs are Entitled to Injunctive Relief.

“To obtain a preliminary injunction, a plaintiff must show three things: (1) without such relief, he will suffer irreparable harm before his claim is finally resolved; (2) he has no adequate remedy at law; and (3) he has some likelihood of success on the merits. *Harlan v. Scholz*, 866 F.3d 754, 758 (7th Cir. 2017) (citing *Girl Scouts of Manitou Council, Inc. v. Girl Scouts of U.S. of Am., Inc.*, 549 F.3d 1079, 1086 (7th Cir. 2008)).” “If the plaintiff can do that much, the court must then weigh the harm the plaintiff will suffer without an injunction against the harm the defendant will suffer with one.” *Harlin*, 866 F.3d at 758 (citing *Ty, Inc. v. Jones Grp., Inc.*, 237 F.3d 891, 895 (7th Cir. 2001)). In addition, the court must ask whether the preliminary injunction is in the public interest. *Jones v. Markiewicz-Qualkinbush*, 842 F.3d 1053, 1058 (7th Cir. 2016).

All elements are met here.

“When the state legislature vests the right to vote for President in its people, the right to vote as the legislature has prescribed is fundamental; and one source of its fundamental nature lies in the equal weight accorded to each vote and the equal dignity owed to each voter.” *Bush v. Gore*, 531 U.S. 98, 104 (2000) (emphasis added). The evidence shows not only that Defendants failed to administer the November 3, 2020 election in compliance with the manner prescribed by the Georgia legislature, but that Defendants committed a scheme and artifice to fraudulently and illegally manipulate the vote count to make certain the election of Joe Biden as President of the United States. This conduct violated Plaintiffs’ equal protection and due process rights as well as their rights under Wisconsin law.

Plaintiffs have a substantial likelihood of success.

The Plaintiff does not need to demonstrate a likelihood of absolute success on the merits. “Instead, [it] must only show that [its] chances to succeed on his claims are ‘better than negligible.’

” *Whitaker v. Kenosha Unified Sch. Dist. No. 1 Bd. of Educ.*, 858 F.3d 1034, 1046 (7th Cir. 2017). (quoting *Cooper v. Salazar*, 196 F.3d 809, 813 (7th Cir. 1999)). “This is a low threshold,” *id.*, that Plaintiffs have easily passed.

Through detailed fact and expert testimony including documentary evidence contained in the Complaint and its exhibits, Plaintiffs have made a compelling showing that Defendants’ intentional actions jeopardized the rights of Wisconsin citizens to select their leaders under the process set out by the Wisconsin Legislature through the commission of election frauds that violated state laws and the Equal Protection Clause in the United States Constitution. And pursuant to 42 U.S.C. § 1983, plaintiffs must demonstrate by a preponderance of the evidence that their constitutional rights to equal protection or fundamental right to vote were violated. *See, e.g., Radentz v. Marion Cty.*, 640 F.3d 754, 756-757 (7th Cir. 2011).

The tally of ballots certified by Defendants giving Mr. Biden the lead with 20,800 votes cannot possibly stand in light of the thousands of illegal mail-in ballots that were improperly counted and the vote manipulation caused by the Dominion software.

Plaintiffs’ equal protection claim is straightforward. The right of qualified citizens to vote in a state election involving federal candidates is recognized as a fundamental right under the Fourteenth Amendment of the United States Constitution. *Harper v. Va. State Bd. of Elections*, 383 U.S. 663, 665 (1966). *See also Reynolds v. Sims*, 377 U.S. 533, 554 (1964) (The Fourteenth Amendment protects the “the right of all qualified citizens to vote, in state as well as in federal elections.”). Indeed, ever since the Slaughter-House Cases, 83 U.S. 36 (1873), the United States Supreme Court has held that the Privileges or Immunities Clause of the Fourteenth Amendment protects certain rights of federal citizenship from state interference, including the right of citizens to directly elect members of Congress. *See Twining v. New Jersey*, 211 U.S. 78,

97 (1908) (citing *Ex parte Yarbrough*, 110 U.S. 651, 663-64 (1884)). *See also Oregon v. Mitchell*, 400 U.S. 112, 148-49 (1970) (Douglas, J., concurring) (collecting cases).

The fundamental right to vote protected by the Fourteenth Amendment is cherished in our nation because it “is preservative of other basic civil and political rights.” *Reynolds*, 377 U.S. at 562; *League of Women Voters of Ohio v. Brunner*, 548 F.3d 463,476 (6th Cir. 2008) (“The right to vote is a fundamental right, preservative of all rights.”). Voters have a “right to cast a ballot in an election free from the taint of intimidation and fraud,” *Burson v. Freeman*, 504 U.S. 191, 211 (1992), and “[c]onfidence in the integrity of our electoral processes is essential to the functioning of our participatory democracy.” *Purcell v. Gonzalez*, 549 U.S. 1, 4 (2006) (*per curiam*).

“Obviously included within the right to [vote], secured by the Constitution, is the right of qualified voters within a state to cast their ballots and have them counted” if they are validly cast. *United States v. Classic*, 313 U.S. 299, 315 (1941). “[T]he right to have the vote counted” means counted “at full value without dilution or discount.” *Reynolds*, 377 U.S. at 555, n.29 (quoting *South v. Peters*, 339 U.S. 276, 279 (1950) (Douglas, J., dissenting)).

“Every voter in a federal . . . election, whether he votes for a candidate with little chance of winning or for one with little chance of losing, has a right under the Constitution to have his vote fairly counted, without its being distorted by fraudulently cast votes.” *Anderson v. United States*, 417 U.S. 211, 227 (1974); *see also Baker v. Carr*, 369 U.S. 186, 208 (1962). Invalid or fraudulent votes “debase[]” and “dilute” the weight of each validly cast vote. *See Anderson*, 417 U.S. at 227.

The right to an honest [count] is a right possessed by each voting elector, and to the extent that the importance of his vote is nullified, wholly or in part, he has been injured in the

free exercise of a right or privilege secured to him by the laws and Constitution of the United States.” *Anderson*, 417 U.S. at 226 (quoting *Prichard v. United States*, 181 F.2d 326, 331 (6th Cir.), *aff’d due to absence of quorum*, 339 U.S. 974 (1950)).

Practices that promote the casting of illegal or unreliable ballots or fail to contain basic minimum guarantees against such conduct, can violate the Fourteenth Amendment by leading to the dilution of validly cast ballots. *See Reynolds*, 377 U.S. at 555 (“[T]he right of suffrage can be denied by a debasement or dilution of the weight of a citizen’s vote just as effectively as by wholly prohibiting the free exercise of the franchise.”). States may not, by arbitrary action or other unreasonable impairment, burden a citizen’s right to vote. *See Baker v. Carr*, 369 U.S. 186, 208 (1962) (“citizen’s right to a vote free of arbitrary impairment by state action has been judicially recognized as a right secured by the Constitution”).

“Having once granted the right to vote on equal terms, the state may not, by later arbitrary and disparate treatment, value one person’s vote over that of another.” *Bush*, 531 U.S. at 104-05. Among other things, this requires “specific rules designed to ensure uniform treatment” in order to prevent “arbitrary and disparate treatment of voters.” *Id.* at 106-07; *see also Dunn v. Bloomstein*, 405 U.S. 330, 336 (1972) (providing that each citizen “has a constitutionally protected right to participate in elections on an equal basis with other citizens in the jurisdiction”). Similarly, equal protection needs to be recognized in this case where many Wisconsin’s citizens’ lawful votes remained uncounted, and many were diluted by unlawful votes in violation of the Equal Protection clause.

The Plaintiffs will suffer Irreparable Harm

“Where, as here, plaintiff has demonstrated a likelihood of success on the merits as to a constitutional claim, such an injury has been held to constitute irreparable harm.” *Democratic*

Nat'l Comm. v. Bostelmann, 447 F.Supp.3d 757, 769 (W.D. Wis. 2020) (citing *Elrod v. Burns*, 427 U.S. 347, 373, 96 S.Ct. 2673, 49 L.Ed.2d 547 (1976) (where plaintiff had proven a probability of success on the merits, the threatened loss of First Amendment freedoms “unquestionably constitutes irreparable injury”); see also *Preston v. Thompson*, 589 F.2d 300, 303 n.4 (7th Cir. 1978) (“The existence of a continuing constitutional violation constitutes proof of an irreparable harm.”).

Moreover, courts have specifically held that infringement on the fundamental right to vote constitutes irreparable injury. See *Obama for Am. v. Husted*, 697 F.3d 423, 435 (6th Cir. 2012) (“A restriction on the fundamental right to vote ... constitutes irreparable injury.”); *Williams v. Salerno*, 792 F.2d 323, 326 (2d Cir. 1986) (holding that plaintiffs “would certainly suffer irreparable harm if their right to vote were impinged upon”).” \

“Additionally, traditional legal remedies would be inadequate, since infringement on a citizens’ constitutional right to vote cannot be redressed by money damages.” *Bostelmann*, 447 F.Supp.3d at 769 (citing *Christian Legal Soc’y v. Walker*, 453 F.3d 853, 859 (7th Cir. 2006) (“The loss of First Amendment freedoms is presumed to constitute an irreparable injury for which money damages are not adequate.”); *League of Women Voters of N. Carolina v. North Carolina*, 769 F.3d 224, 247 (4th Cir. 2014) (“[O]nce the election occurs, there can be no do-over and no redress.”).”

The Balance of Harms & Public Interest

Under Seventh Circuit law, a “sliding scale” approach is used for balancing of harms: “[t]he more likely it is that [the movant] will win its case on the merits, the less the balance of harms need weigh in its favor.” *Girl Scouts of Manitou Council v. Girl Scouts of United States of Am., Inc.*, 549 F.3d 1079, 1100 (7th Cir. 2008). Plaintiffs above have shown their strong

likelihood of success on the merits above. The low costs to Defendants and high potential harm to Plaintiffs make this a case with a substantial net harm that an immediate and emergency injunctive relief can prevent.

In this regard, Plaintiffs would highlight a recent Eleventh Circuit decision addressed a claim in 2018 related to Georgia's voting system and Dominion Voting Systems that bears on the likelihood of Plaintiffs' success on the merits and the balance of harms in the absence of injunctive relief:

In summary, while further evidence will be necessary in the future, the Court finds that the combination of the statistical evidence and witness declarations in the record here (and the expert witness evidence in the related *Curling* case which the Court takes notice of) persuasively demonstrates the likelihood of Plaintiff succeeding on its claims. Plaintiff has shown a substantial likelihood of proving that the Secretary's failure to properly maintain a reliable and secure voter registration system has and will continue to result in the infringement of the rights of the voters to cast their **vote** and have their **votes** counted.

Common Cause Georgia v. Kemp, 347 F. Supp. 3d 1270, 1294-1295, (11th Cir. 2018).

Therefore, it is respectfully requested that the Court grant Plaintiffs' Motion and enter the proposed Order submitted therewith.

Respectfully submitted, this 30th day of November 2020.

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*Application for admission forthcoming

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