IN THE IOWA DISTRICT COURT FOR POLK COUNTY

[redacted]-
[redacted]

Plaintiffs, pro se

v.

PAUL PATE, in his official capacity as Secretary of State of the State of Iowa.

Defendant

Case No:

PETITION FOR INJUNCTIVE RELIEF

COMPLAINT AND REQUEST FOR EMERGENCY INJUNCTION

COME NOW Plaintiff, [redacted], pro se, and Plaintiff, [redacted], pro se, hereby file this petition against Defendant, IOWA SECRETARY OF STATE ("SOS") Paul Pate; in his official capacity as SECRETARY OF STATE ("Defendant"). Plaintiffs bring this petition to preserve the integrity of Iowa elections and the voting systems and machines purchased and used during election of November 3, 2020, primary election held on June 12, 2022 and the upcoming election November 8, 2022. In support of the claims set forth herein, Plaintiffs allege and aver as follows:

PARTIES

Plaintiff [redacted] is a legal resident of Polk County in the State of Iowa and was a registered voter in the State of Iowa during the November 3, 2020 election, and voted, and plans to vote in November 8, 2022 election.

Plaintiff [redacted] is a legal resident of Polk County in the State of Iowa and a registered voter in the upcoming election, voted in primary election June 12, 2022 and plans to vote in November 8, 2022 election.

Defendant Paul Pate is an Iowa resident and was elected on November 4, 2014 and again on November 6, 2018 as IOWA SECRETARY OF STATE ("SOS") and has served in that position since January 1, 2015; in the capacity, is responsible for the implementation of all official election laws, policies, regulations, and procedures in effect for the entire state of IOWA.

JURISDICTION AND VENUE

Plaintiffs incorporate the foregoing paragraphs as if set forth in full herein.

This Court has subject matter jurisdiction over Plaintiffs' claims under the ***Article V, § 6 of the Iowa Constitution and***

Article II, § 1 & 6 of the Iowa Constitution and

IOWA CODE § 52.5 and
IOWA ADMIN. CODE r. 721-22.1(52) and
IOWA ADMIN. CODE r. 721-22.2(52)
Venue is proper because Defendant performs his official duties in the State of Iowa, affecting every county therein.

STATEMENT OF FACTS

INTRO

1. The methods by which elections at the local, state, and Federal levels in Iowa were conducted in 2020, and are being conducted in 2022, cannot be shown to provide the fair elections guaranteed to every citizen under U.S and Iowa Constitutions, ***U.S. Constitution 14th Amendment & Article II, § 1 & 6 of the Iowa Constitution***.
2. The right to vote is protected by the Equal Protection Clause and the Due Process Clause. U.S. CONST. amend. XIV, § 1, cl. 3-4. Because "the right to vote is personal," Reynolds, 377 U.S. at 561-62. "[e]very 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." Anderson v. United States, 417 U.S. 211, 227 (1974); Baker v. Carr, 369 U.S. 186, 208 (1962). Invalid or fraudulent votes debase or dilute the weight of each validly cast vote. Bush II, 531 U.S. at 105. The unequal treatment of votes within a state, and unequal standards for processing votes raise equal protection concerns.
3. The Supreme Court of the United States has recognized that the right to vote consists of not only casting a ballot, but having that vote counted accurately, as it was cast.
4. "We regard it as equally unquestionable that the right to have one's vote counted is as open to protection by Congress as the right to put a ballot in a box." See United States v. 13 Mosley, 238 U.S. 386 (1915)
5. "No right is more precious in a free country than that of having a voice in the election of those who make the laws under which, as good citizens, we must live. Other rights, even

the most basic, are illusory if the right to vote is undermined." See Wesberry v. Sanders, 376 U.S. 17 (1964)

6. "No one would deny that the equal protection clause would . . . prohibit a law that would expressly give certain citizens a half-vote and others a full vote. . . . [T]he constitutionally guaranteed right to vote and the right to have one's vote counted clearly imply the policy that state election systems, no matter what their form, should be designed to give approximately equal weight to each vote cast. . . . [A] state legislature cannot deny eligible voters the right to vote for Congressmen and the right to have their vote counted." See Reynolds v. Sims, 377 U.S. 563 (1964), citing Colegrove v. Green, 328 U.S. 549, 328 U.S. 569-571
7. By utilizing voting machines tested by Voting System Test Laboratories with improper Election Assistance Commission accreditation at the time of certification and with the potential for the Trapdoor mechanism described in Exhibit L, Iowa has deprived its voters of the capability of knowing that their vote was accurately counted.
8. Plaintiffs are entitled to temporary, preliminary, and permanent injunctive relief by restraining Defendant from destroying the November 2020 election data as scheduled 22 months after the election, ***IOWA CODE § 50.12,*** until a thorough investigation of the software and its Trapdoor vulnerabilities can be undertaken.

VIOLATIONS TO EAC, HAVA, & IOWA CODE FOR ELECTIONS

9. Voting System Test Laboratories, further known as (VSTL), Pro V&V, NTS Huntsville (formerly Wyle Laboratories), known further as (NTS), and SLI Compliance accreditation(s) provided from the Election Assistance Commission, further known as (EAC), for the 2020 General Election and subsequent elections thereof, were not in compliance with the written policy of the ***EAC Voting System Test Laboratory Program Manual, version 2.0, (OMB-3265-0018)[1] , Section 3.4, 3.6 and 3.8*** which violate the federal standards for laboratory testing accreditation set forth in the ***HELP AMERICA VOTE ACT 2002, (HAVA ACT)[2], Subtitle B § 231 (a) (1) (2) (b) (1)***.

[1] https://www.eac.gov/sites/default/files/eac_assets/1/28/VSTLManual%207%208%2015%20FINAL.pdf
[2] https://www.congress.gov/107/plaws/publ252/PLAW-107publ252.pdf

10. This lack of compliance not only violates Federal codes and official policy of the EAC, but also violates ***IOWA CODE § 52.5***, as well as the Secretary of state administrative code ***IOWA ADMIN. CODE r. 721-22.1(52) and IOWA ADMIN. CODE r. 721-22.2(52).***

11. These VSTLs were used in testing and certification of the Voting System Machines further known as (VSM) used in the Iowa 2020 General Elections and elections thereafter.

12. ***IOWA CODE § 52.5 paragraph 2,*** states:

> "2. The state commissioner shall formulate, with the advice and assistance of the examiners, and adopt rules governing the testing and examination of any voting machine or optical scan voting system by the board of examiners. The rules shall prescribe the method to be used in determining whether the machine or system is suitable for use within the state and performance standards for voting equipment in use within the state. The rules shall provide that all optical scan voting systems and voting machines approved for use by the examiners after April 9, 2003, shall meet voting systems performance and test standards, as adopted by the federal election commission on April 30, 2002, and as deemed adopted by Pub. L. No. 107-252, § 222. The rules shall include standards for determining when recertification is necessary following modifications to the equipment or to the programs used in tabulating votes, and a procedure for rescinding certification if a system or machine is found not to comply with performance standards adopted by the state commissioner."

13. ***IOWA ADMIN. CODE r. 721-22.1(52)***, states:

> "'Accredited independent test authority' means a person or agency that was formally recognized by the National Association of State Election Directors as competent to design and perform qualification tests for voting system hardware

and software. 'Accredited independent test authority' also includes voting system test laboratories accredited by the Election Assistance Commission to test voting systems for compliance with federal voting system standards and guidelines, as required by the Help America Vote Act, Section 231."

14. ***IOWA ADMIN. CODE r. 721-22.2(52)***, states:

"All electronic voting systems and machines approved for use by the Board of Examiners after April 9, 2003, shall meet Voting Systems Performance and Test Standards, as adopted by the Federal Election Commission April 30, 2002. The report of an accredited independent test authority certifying that the system is in compliance with these standards shall be submitted with the application for examination."

15. Per the (VSTL) Voting System Test Laboratory Program Manual ver. 2.0 effective May 31, 2015, page 38, Sec 3.6.1[3]. Certificate of Accreditation: A Certificate of Accreditation shall be issued to each laboratory by vote of the Commissioners. The certificate shall be signed by the CHAIR of the Commission and state:

"3.6.1.3. The effective date of the certification, which shall not exceed a period of two (2) years."

So not just the date is important, but the signature on the Lab Certification of Accreditation is very crucial. Commission Chairman only serve one (1) year, but their signature is good on these certificates for two (2) years.

16. The (VSTL) program requires certified laboratories to submit an application package to the Program Director, consistent with the procedures of Section 3.4, no earlier than 60 days before the accreditation expiration date, and no later than 30 days before their accreditation expire. Pro V&V and SLI Compliance did not submit an application prior to

[3] https://www.eac.gov/sites/default/files/eac_assets/1/28/VSTLManual%207%208%2015%20FINAL.pdf

the expiration date in 2015 and 2017 respectfully. The EAC and the Program Director were remiss in their duties in acknowledging the expiration of certification.

SPECIFIC VIOLATIONS BY COUNTY

17. Per the document published on the IOWA SECRETRARY OF STATES website[4] regarding voting system's used in Iowa Counties, the **Optical Voting System and Model: Unisyn OVO v. 1.3.3.M** with the **OpenElect 1.3.3.M** software was used in the following counties: Dallas, Polk, and Webster. And per the Approved Voting Systems published on the IOWA SECRETARY OF STATES website[5], was approved for use in Iowa on March 6th, 2016. (See Exhibit A & B)

18. When reviewing the EAC's website, the EAC Certification for Optical Voting System and Model: **Optical Voting System and Model: Unisyn OVO v. 1.3.3.M** with the **OpenElect 1.3.3.M** software was found to have been tested by VSTL NTS certified on January 12, 2015 with EAC Certification Number: 04211950-21.3[6]. (Exhibit F)

19. The last available EAC accreditation for VSTL NTS, was signed on May 4th, 2010 and only effective through April 27th, 2012[7]. This means that the EAC Certification for the VSM and software was granted almost three years since the VSTL EAC Accreditation had expired. And approved by the Secretary of State almost 4 years since the VSTL EAC accreditation had expired. (Exhibit C)

20. These violations were not just for the VSM and software used in Polk County, but in almost all Iowa Counties.

[4] https://sos.iowa.gov/elections/pdf/covotesystem.pdf
[5] https://sos.iowa.gov/elections/pdf/approvedvotingsystems.pdf
[6] https://www.eac.gov/sites/default/files/voting_system/files/OVS1.3_Scope%26Cert_FINAL_01.12.2015.pdf
[7] https://www.eac.gov/sites/default/files/voting_system_test_lab/files/Wyle%20Accreditation%20certificate%202020 10.pdf

21. Allamakee, Buchanan, Cerro Gordo, Crawford, Decatur, Franklin, Fremont, Howard, Lyon, Marshall, Monona, Monroe, O'Brien, Osceola, Plymouth, Sac, Warren, Winneshiek, and Wright counties used **Optical Voting System and Model: Unisyn OVO v. 1.3** with the **OpenElect 1.3** software, and tested by NTS, certified on 1/12/2015 with EAC Certification Number: 04211950-1.3[8]. Again, this is almost 3 years after NTS had their accreditation expire. (Exhibit A, B, C & F)

22. Clinton, Delaware, Kossuth, Lee, Palo Alto, and Pottawattamie counties used **Optical Voting System and Model: ES&S DS200 v. 2.12.0.2** with the **EVS 5.2.0.2** software, as also tested by NTS. Not only can the 5.2.0.2 firmware version not be found to have been tested and certified on the EAC landing page for certified VSM's[9] but even logical versions prior to this firmware version, EVS 5.2.0.0, was certified on 7/2/2014 and after the NTS accreditation expiration[10]. (Exhibit A, B, D & G)

23. Emmet and Fayette counties used **Optical Voting System and Model: ES&S M100 v. 5.4.4.5** with the **Unity 3.4.1.1** software, as also tested by NTS. Not only can the 3.4.1.1 firmware version not be found to have been tested and certified on the EAC landing page for certified VSM's[11] but even logical versions prior to this firmware version, Unity 3.4.1.0, was certified on 3/31/2014 and after the NTS Accreditation expiration[12]. (Exhibit A, B, C & H)

24. SLI Compliance VSTL accreditation was signed on January 10, 2018, however it was signed by the Executive Director, Brian Newby, not the EAC chair, and despite the effective date stating through January 10, 2021, was only effective for 2 years until January 10, 2020 per the VSTL Program Manual ver. 2.0 effective May 31, 2015, page 38, Sec 3.6.1[13]. (Exhibit D)

[8] https://www.eac.gov/sites/default/files/voting_system/files/OVS1.3_Scope%26Cert_FINAL_01.12.2015.pdf
[9] https://www.eac.gov/voting-equipment/certified-voting-systems
[10] https://www.eac.gov/sites/default/files/voting_system/files/Scope.and.Cert.REVISED.2.18.15.pdf
[11] https://www.eac.gov/voting-equipment/certified-voting-systems
[12] https://www.eac.gov/sites/default/files/voting_system/files/Unity3410ScopeFinal4.4.14.pdf
[13] https://www.eac.gov/sites/default/files/eac_assets/1/28/VSTLManual%207%208%2015%20FINAL.pdf

25. Black Hawk, Clayton, Jasper, Johnson, Jones, Linn, Muscatine, Scott, and Wapello counties used **Optical Voting System and Model: ES&S DS200 v. 2.12.3.0** with the **EVS 5.3.2.0** software. Not only can the **5.3.2.0** firmware version not be found to have been tested and certified on the EAC landing page for certified VSM's[14], but even logical versions considering typos like "5.2.3.0", was certified by SLI Compliance, whose accreditation was signed by the Executive Director, Brain Newby and not the EAC Chair as required per the VSTL Program Manual ver. 2.0 effective May 31, 2015, page 38, Sec 3.6.1[15]. (Exhibit A, B, D, & I)

26. Woodbury county used **Optical Voting System and Model: ES&S DS200 v. 2.12.4.0** with the **EVS 5.3.4.0** software. Not only can the 5.3.4.0 firmware version not be found to have been tested and certified on the EAC landing page for certified VSM's[16], but even logical versions prior to this firmware version that could be found, "5.2.3.0", was certified by SLI Compliance whose accreditation was signed by the Executive Director, Brain Newby and not the EAC Chair as required per the VSTL Program Manual ver. 2.0 effective May 31, 2015, page 38, Sec 3.6.1[17]. And no version in the 5.3.0.0 range could even be found. (Exhibit A, B, D & I)

27. The last available EAC accreditation for VSTL Pro V&V was signed on 2/24/2015 and was only effective through February 24, 2017. It was also signed by the Acting Executive Director and not by the EAC Chair as required per VSTL Program Manual ver. 2.0 effective May 31, 2015, page 38, Sec 3.6.1[18]. (Exhibit E)

28. Benton, Madison, Mahaska, Marion, Mills, Montgomery, Page, Pocahontas, Poweshiek, Ringgold, Shelby, Sioux, Story, Taylor, Union, Washington, Winnebago, and Worth Counties used **Optical Voting System and Model: Unisyn OVO v. 1.3** with the **OpenElect 2.0** software, and tested by Pro V&V certified on 10/17/2017 with EAC

[14] https://www.eac.gov/voting-equipment/certified-voting-systems
[15] https://www.eac.gov/sites/default/files/eac_assets/1/28/VSTLManual%207%208%2015%20FINAL.pdf
[16] https://www.eac.gov/voting-equipment/certified-voting-systems
[17] https://www.eac.gov/sites/default/files/eac_assets/1/28/VSTLManual%207%208%2015%20FINAL.pdf
[18] https://www.eac.gov/sites/default/files/voting_system_test_lab/files/Pro_VandV_accreditation_certificate_2015.pdf

Certification Number: UNS10121966-2.0[19]. This was almost 8 months after the EAC accreditation for ProV&V had expired and which was also signed by the Acting Executive Director and not by the EAC Chair as required per the VSTL Program Manual ver. 2.0 effective May 31, 2015, page 38, Sec 3.6.1[20]. (Exhibit A, B, E & J)

29. Adams, Audubon, Boone, Buena Vista, Butler, Calhoun, Carroll, Cass, Cherokee, Chickasaw, Clarke, Clay, Davis, Des Moines, Dubuque, Floyd, Greene, Guthrie, Hamilton, Hancock, Harrison, Henry, Humboldt, Ida, Iowa, Jackson, Jefferson, Keokuk, and Louisa counties used **Optical Voting System and Model: Unisyn OVO v. 2.0** with the **OpenElect 2.0** software, and tested by Pro V&V certified on 10/17/2017 with EAC Certification Number: UNS10121966-2.0[21]. This was almost 8 months after the EAC accreditation for ProV&V had expired, and which was also signed by the Acting Executive Director and not by the EAC Chair as required per the VSTL Program Manual ver. 2.0 effective May 31, 2015, page 38, Sec 3.6.1[22]. (Exhibit A, B, E, & J)

30. Adair, Appanoose, Bremer, Cedar, Dickinson, Hardin, Lucas, Mitchell, and Wayne counties used **Optical Voting System and Model: Dominion ImageCast Precinct v.5.0.1 US, hw version 320A** with the **Democracy Suite 5.0 software**, which was tested by ProV&V VSTL, certified on 2/8/2017 with EAC Certification ID: DVS-DemSuite5.0-A[23], and although this was done while ProV&V's EAC Accreditation was still valid, it was signed by the EAC Acting Executive Director and not the EAC Chair as required per the VSTL Program Manual ver. 2.0 effective May 31, 2015, page 38, Sec 3.6.1[24]. (Exhibit A, B, E, & K)

ELECTION SOFTWARE WHISTLEBLOWER

[19] https://www.eac.gov/sites/default/files/voting_system/files/CertofConformanceFinal-Unisyn_2.0_FINAL_10_17_17.pdf
[20] https://www.eac.gov/sites/default/files/eac_assets/1/28/VSTLManual%207%208%2015%20FINAL.pdf
[21] https://www.eac.gov/sites/default/files/voting_system/files/CertofConformanceFinal-Unisyn_2.0_FINAL_10_17_17.pdf
[22] https://www.eac.gov/sites/default/files/eac_assets/1/28/VSTLManual%207%208%2015%20FINAL.pdf
[23] https://www.eac.gov/sites/default/files/voting_system/files/Scope.and.Cert.FINAL.2.8.17.pdf
[24] https://www.eac.gov/sites/default/files/eac_assets/1/28/VSTLManual%207%208%2015%20FINAL.pdf

31. Voting systems in use in the United States now, and in 2020 election, are subject to tampering through a "trapdoor" mechanism inherent in all election systems. This "trapdoor" mechanism is described in detail in Exhibit L, affidavit of Terpesehore Maras, filed under penalty of perjury on December 1, 2020 in case #2:20-cv-01771-PP in the 2nd Judicial District of the Denver District Court in Denver, Colorado[25]. (Exhibit L)

32. Terpesehore Maras is a trained Cryptolinguist, holds a completed degree in Molecular and Cellular Physiology with formal training in other sciences such as Computational Linguistics, Game Theory, Algorithmic Aspects of Machine Learning, and Predictive Analytics. Terpesehore Maras, possesses more than two decades of experience in mathematical modeling and pattern analysis as well as lesser experience in network tracing and cryptography. Additionally, she has extensive involvement in overseeing OCONUS elections and the HAVA Act for CONUS elections. The information presented in the affidavit is personal, first-hand account clarifies in detail as to why EAC Accreditation is so important to ensure fair elections. Key portions of the affidavit emphasizing proper EAC Accreditation and VSTL testing are as follows:

> "11. VSTL's are VERY important because equipment vulnerabilities allow for deployment of algorithms and scripts to intercept, alter, and adjust voting tallies."
>
> "20. VSTLs are the most important component of the election machines as they examine the use of COTS (Commercial Off–The-Shelf)"
>
> "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. They key issue in this is that MOST of the COTS used by

[25] https://storage.courtlistener.com/recap/gov.uscourts.wied.92717/gov.uscourts.wied.92717.9.13.pdf

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."

"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"."

(Exhibit L)

33. Terpesehore Maras also provides evidence of the conflict of interest in VSM software and election result reporting. Two companies in particular, Huawei and Akamai, the latter of which is partnered with SCYTL, with SCYTL being linked to Dominion Software. SCYTL receives the tallied votes on behalf of Dominion and, under contract with Associated Press (AP), provides the results for reporting. This shows that voting

information is under the control of the companies that provide the Voting Systems. (Exhibit L)

34. She further elaborates on the "trapdoor" mechanism available to alter votes via algorithms in the encryption process of which she observed in the 2020 election. Summarizing her example using SCYTL.

Step 1: A ballot containing votes is encrypted by Dominion and sent to SCTYL.

Step 2: SCYTL takes those ballots and using a key generator agreed to by both parties (Dominion and SCYTL) accesses the contents of the encrypted ballots.

Step 3: The algorithm then re-encrypts the ballots using the same key generator to create a ciphertext such that the encrypted processed ballots appear as the original from Dominion.

Step 4: Decryption and public release of the vote tallies.

In her own words,

> "50. When the votes are sent to Scytl via Dominion Software EMS (Election Management System) the Trap Door is accessed by Scytl or TRAP DOOR keys (Commitment Parameters)."
>
> "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)"

"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."

(Exhibit L)

35. Maras covers in great detail how 2020 Election reporting demonstrated this algorithm in key swing states as examples and further demonstrates plaintiffs claims on lack of VSTL EAC Accreditations, EAC violations of the HAVA Act, and the importance of robust testing of VSMs and EMS systems to help ensure fair elections. (Exhibit L)

36. CONCLUSION: This affidavit presents unambiguous evidence of:

    a. Foreign interference

    b. Complicit behavior by the previous administrations from 1999 to present to hinder the voice of the American people

    c. Knowingly and willingly colluding with foreign powers to manipulate the outcome of the 2020 election

    d. Foreign nationals, through investments and interests, assisted in the creation of the Dominion software

    e. Akamai Technologies merged with a Chinese company that makes and distributes the COTS components of election machines

    f. US persons holding an office and private individuals knowingly and willingly oversaw fail safes to secure our elections

    g. The EAC failed to abide by standards set in HAVA ACT 2002

    h. The IG of the EAC failed to address complaints since their appointment regarding vote integrity

i. Christy McCormick of the EAC failed to ensure that EAC conducted their duties as set forth by HAVA ACT 2002

j. 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

k. The EAC failed to have a quorum for over a calendar year leading to the inability to meet the standards of the EAC.

l. AKAMAI Technologies and Hurricane Electric raise serious concerns for NATSEC due to their ties with foreign hostile nations

(Exhibit L)

37. Based on pending and closed Iowa Open Records requests, Plaintiffs, believe, that the Secretary of State requires every Iowa County to use an election night reporting program from Scytl. This is the same company referenced in Exhibit L, which casts further doubt on election integrity. (Exhibit M)

SUMMARY/CLOSING

38. There is an urgency to Plaintiffs petition with the upcoming destruction for the November 2020 election data as scheduled 22 months after the election on September 3, 2022, ***IOWA CODE § 50.12.*** The many violations of VSTL EAC accreditations render the EAC VSM certifications invalid. The reason for such policy and law is to ensure that the VSM and their software do not have vulnerabilities that could be exploited to undermine election integrity and are set forth by ***EAC Voting System Test Laboratory Program Manual, version 2.0, (OMB-3265-0018)[26] , Section 3.4, 3.6 and 3.8*** to meet the federal standards for laboratory testing accreditation set forth in the ***HELP AMERICA VOTE ACT 2002, (HAVA ACT)[27], Subtitle B § 231 (a) (1) (2) (b) (1)***. Exhibit L, affidavit of Terpesehore Maras, filed under penalty of perjury on December 1, 2020 in case #2:20-cv-01771-PP in the 2nd Judicial District of the Denver District Court in Denver, Colorado[28],

[26] https://www.eac.gov/sites/default/files/eac_assets/1/28/VSTLManual%207%208%2015%20FINAL.pdf
[27] https://www.congress.gov/107/plaws/publ252/PLAW-107publ252.pdf
[28] https://storage.courtlistener.com/recap/gov.uscourts.wied.92717/gov.uscourts.wied.92717.9.13.pdf

explains the trapdoor mechanism in the encryption/decryption process, the conflict of interests with Scytl, the foreign interests involved, the EAC violations, the importance of VSTLs, and testing of COTS. The approval by the Secretary of State for use in Iowa with such gaps in EAC policy and potential vulnerabilities violates our State Constitutional rights and laws, ***Article II, § 1 & 6 of the Iowa Constitution***, ***IOWA CODE § 52.5, IOWA ADMIN. CODE r. 721-22.1(52), and IOWA ADMIN. CODE r. 721-22.2(52)***, as well as our U.S Constitutional rights and laws, ***U.S. Constitution 14th Amendment, 52 U.S. Code § 20971, and HAVA of 2002 § 231.*** For all the reasons above a complete failure of duty to provide safe and just elections are observed.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgement against Defendant as follows:

A. That this Court assume jurisdiction of this Action;

B. Until Defendant can prove beyond a reasonable doubt that the voting machines, as configured in 2020 for the 2020 elections, and as configured in 2022 for the 2022 elections in Iowa, absolutely comply with every legal requirement as articulated in state and federal laws ***Article II, § 1 & 6 of the Iowa Constitution***, ***IOWA CODE § 52.5, IOWA ADMIN. CODE r. 721-22.1(52), IOWA ADMIN. CODE r. 721-22.2(52), 52 U.S. Code § 20971, and HAVA of 2002 § 231***; and prove beyond reasonable doubt that the voting machine and election management system software does not contain code to execute, nor connect to any 3rd party computer networks that can execute or enable "trap door" features as described in Exhibit L:

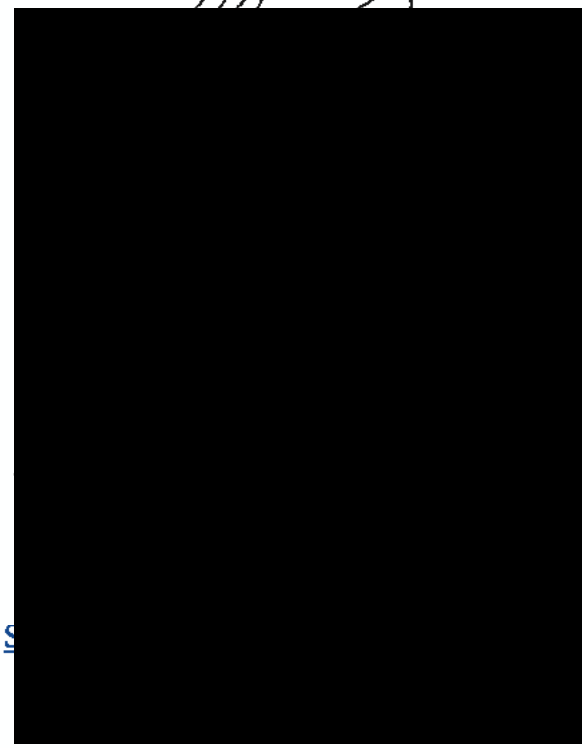
    a. Temporarily restrain, as well as preliminarily and permanently enjoin Defendant from destroying, altering, or otherwise changing all voting machines, software, peripherals, and other data and equipment used to cast, examine, count, tabulate, modify, store, or transmit votes or voting data in the November 2020 elections held in Iowa and which are planned to be used in the same manner in the upcoming November 2022 elections to be held in Iowa;
    b. Order Defendant to preserve in their current state all voting machines, software, peripherals, and other data and equipment used to cast, examine, count, tabulate, modify, store, or transmit votes or voting data in the November 2020 elections held in Iowa and which are planned to be used in

the same manner in the upcoming November 2022 elections to be held in Iowa;

c. Order the State of Iowa to immediately stop the use of election machines and to reconfigure elections to be held exclusively with hand-counted paper ballots; and

C. Such other relief as is just and proper.

Respectfully submitted,



Dated: August 2, 2022

VERIFICATION

VERIFICATION

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County	Precincts	Optical Voting System and Model	Accessible System and Model	Absentee Tabulation	Software
Adair	5	Dominion ImageCast Precinct v. 5.0.1 US, hw version 320A	Dominion ImageCast Precinct v. 5.0.1 US, hw version 320A		Democracy Suite 5.0
Adams	5	Unisyn OVO v. 2.0	Unisyn FVT		OpenElect 2.0
Allamakee	11	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 1.3
Appanoose	12	Dominion ImageCast Precinct v. 5.0.1 US, hw version 320A	Dominion ImageCast Precinct v. 5.0.1 US, hw version 320A		Democracy Suite 5.0
Audubon	2	Unisyn OVO v. 2.0	Unisyn FVT		OpenElect 2.0
Benton	19	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 2.0
Black Hawk	62	ES&S DS200 v. 2.12.3.0	ExpressVote v. 1.4.1.2	DS850 v.2.10.2.0.	EVS 5.3.2.0
Boone	15	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Bremer	13	Dominion ImageCast Precinct v. 5.0.1 US, hw version 320A	Dominion ImageCast Precinct v. 5.0.1 US, hw version 320A		Democracy Suite 5.0
Buchanan	15	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 1.3
Buena Vista	10	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Butler	8	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Calhoun	10	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Carroll	13	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Cass	13	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Cedar	12	Dominion ImageCast Precinct v. 5.0.1 US, hw version 320A	Dominion ImageCast Precinct v. 5.0.1 US, hw version 320A		Democracy Suite 5.0
Cerro Gordo	26	Unisyn OVO v. 1.3	Unisyn OVI v. 1.3		OpenElect 1.3
Cherokee	7	Unisyn OVO v. 2.0	Unisyn FVT		OpenElect 2.0
Chickasaw	13	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Clarke	7	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Clay	12	Unisyn OVO v. 2.0	Unisyn FVT		OpenElect 2.0
Clayton	14	ES&S DS200 v. 2.12.3.0	ExpressVote v. 1.4.1.2		EVS 5.3.2.0
Clinton	26	ES&S DS200 v. 2.12.0.2	ExpressVote v. 1.4.1.0	DS850 v.2.10.0.0.	EVS 5.2.0.2
Crawford	8	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 1.3
Dallas	34	Unisyn OVO v. 1.3.3.M	Unisyn OVI v. 1.3		OpenElect 1.3.3.M
Davis	8	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Decatur	7	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 1.3
Delaware	12	ES&S DS200 v. 2.12.0.2	ExpressVote v. 1.4.1.0		EVS 5.2.0.2
Des Moines	16	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Dickinson	15	Dominion ImageCast Precinct v. 5.0.1 US, hw version 320A	Dominion ImageCast Precinct v. 5.0.1 US, hw version 320A		Democracy Suite 5.0
Dubuque	35	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Emmet	11	ES&S M100 v. 5.4.4.5	ES&S A100 v. 1.3.2907		Unity 3.4.1.1
Fayette	25	ES&S M100 v. 5.4.4.5	ES&S A100 v. 1.3.2907		Unity 3.4.1.1
Floyd	8	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Franklin	12	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 1.3

County	Precincts	Optical Voting System and Model	Accessible System and Model	Absentee Tabulation	Software
Fremont	5	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 1.3
Greene	7	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Grundy	7	ES&S ES&S M100 v. 5.2.1.0	ES&S A100 v. 1.1.2258		Unity 3.0.1.1
Guthrie	8	Unisyn OVO v. 2.0	Unisyn FVT		OpenElect 2.0
Hamilton	8	Unisyn OVO v. 2.0	Unisyn FVT		OpenElect 2.0
Hancock	10	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Hardin	8	Dominion ImageCast Precinct v. 5.0.1 US, hw version 320A	Dominion ImageCast Precinct v. 5.0.1 US, hw version 320A		Democracy Suite 5.0
Harrison	13	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Henry	9	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Howard	9	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 1.3
Humboldt	9	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Ida	7	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Iowa	11	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Jackson	16	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Jasper	20	ES&S DS200 v. 2.12.3.0	ExpressVote v. 1.4.1.2	DS850 v.2.10.2.0.	EVS 5.3.2.0
Jefferson	12	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Johnson	57	ES&S DS200 v. 2.12.3.0	ExpressVote v. 1.4.1.2	DS850 v.2.10.2.0.	EVS 5320
Jones	14	ES&S DS200 v. 2.12.3.0	ExpressVote v. 1.4.1.2		EVS 5320
Keokuk	15	Unisyn OVO v. 2.0	Unisyn FVT		OpenElect 2.0
Kossuth	20	ES&S DS200 v. 2.12.0.2	ExpressVote v. 1.4.0.0		EVS 5.2.0.2
Lee	22	ES&S DS200 v. 2.12.0.2	ExpressVote v. 1.4.0.0		EVS 5.2.0.2
Linn	86	ES&S DS200 v. 2.12.3.0	ExpressVote v. 1.4.1.2	DS850 v.2.10.2.0.	EVS 5.3.2.0
Louisa	5	Unisyn OVO v. 2.0	Unisyn OVI VC		OpenElect 2.0
Lucas	7	Dominion ImageCast Precinct v. 5.0.1 US, hw version 320A	Dominion ImageCast Precinct v. 5.0.1 US, hw version 320A		Democracy Suite 5.0
Lyon	8	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 1.3
Madison	9	Unisyn OVO v. 1.3	Unisyn OVI v. 1.3		OpenElect 2.0
Mahaska	11	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 2.0
Marion	17	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 2.0
Marshall	19	Unisyn OVO v. 1.3	Unisyn OVI v. 1.3		OpenElect 1.3
Mills	11	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 2.0
Mitchell	11	Dominion ImageCast Precinct v. 5.0.1 US, hw version 320A	Dominion ImageCast Precinct v. 5.0.1 US, hw version 320A		Democracy Suite 5.0
Monona	11	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 1.3
Monroe	7	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 1.3
Montgomery	7	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 2.0
Muscatine	23	ES&S DS200 v. 2.12.3.0	ExpressVote v. 1.4.1.2	DS450 v.3.0.0.0	EVS 5.3.2.0
O'Brien	9	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 1.3
Osceola	8	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 1.3

County	Precincts	Optical Voting System and Model	Accessible System and Model	Absentee Tabulation	Software
Page	8	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 2.0
Palo Alto	6	ES&S DS200 v. 2.12.0.2	ExpressVote v. 1.4.0.0		EVS 5.2.0.2
Plymouth	13	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 1.3
Pocahontas	7	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 2.0
Polk	177	Unisyn OVO v. 1.3.3.M	Unisyn OVI v. 1.3		OpenElect 1.3.3.M
Pottawattamie	40	ES&S DS200 v. 2.12.0.2	ExpressVote v. 1.4.0.0	DS850 v.2.10.0.0.	EVS 5.2.0.2
Poweshiek	10	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 2.0
Ringgold	7	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 2.0
Sac	9	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 1.3
Scott	63	ES&S DS200 v. 2.12.3.0	ExpressVote v. 1.4.1.2	DS850 v.2.10.2.0.	EVS 5.3.2.0
Shelby	9	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 2.0
Sioux	16	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 2.0
Story	43	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 2.0
Tama	15	ES&S M100 v. 5.2.1.0	ES&S AutoMark100 v. 1.1.2258		Unity 3.0.1.1
Taylor	7	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 2.0
Union	8	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 2.0
Van Buren	8	ES&S M100 v. 5.2.1.0	ES&S A100 v. 1.1.2258		Unity 3.0.1.1
Wapello	22	ES&S DS200 v. 2.12.3.0	ExpressVote v. 1.4.1.2		EVS 5.3.2.0
Warren	31	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 1.3
Washington	10	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 2.0
Wayne	4	Dominion ImageCast Precinct v. 5.0.1 US, hw version 320A	Dominion ImageCast Precinct v. 5.0.1 US, hw version 320A		Democracy Suite 5.0
Webster	28	Unisyn OVO v. 1.3.3.M	Unisyn OVI v. 1.3		OpenElect 1.3.3.M
Winnebago	10	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 2.0
Winneshiek	11	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 1.3
Woodbury	44	ES&S DS200 v. 2.12.4.0	ExpressVote v. 2.4.2.0	DS 850 2.10.2.0	EVS 5.3.4.0
Worth	7	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 2.0
Wright	10	Unisyn OVO v. 1.3	Unisyn OVI VC		OpenElect 1.3
	1680	**Total Precincts**			
	99	**Absentee Precincts**			
	1779	**Grand Total**			

State of Iowa
Approved Voting Systems

Exhibit B

Company Name and Address	Voting System Only the versions listed are approved for use in Iowa.
Election Systems and Software 11208 John Galt Blvd. Omaha, Nebraska 68137 (800) 247-8683 info@essvote.com	**Software Version** ESS Event Log Service 2.0.0.0 Removable Media Service 2.0.0.0 ElectionWare 5.0.5.0 ExpressVote Previewer 1.5.4.0 & 2.6.0.0 Regional Results 1.3.0.0. **Firmware** DS200 2.21.1.0 DS450 3.5.0.0 DS850 3.5.0.0. ExpressVote Universal Voting Device 1.5.4.0 & 2.6.0.0 **COTS** Operating System Windows 10 LTSC/Windows Server 2016 Adobe Acrobat Standard XI Ceberus FTP Server 11.3.4 (64 bit) IPSwitch WS FTP 12 12.7.0 Kiwi Syslog Server 9.6.7 Cisco A5506 or A5508 Firewall 9.16.1 Cradlepoint Router 7.0.7.0 or 7.21.30
Election Systems and Software 11208 John Galt Blvd. Omaha, Nebraska 68137 (800) 247-8683 info@essvote.com	**EVS 6.1.1.0 – Approved 6-2-2021** **Software Version** ESS Event Log Service 2.0.0.0 Removable Media Service 2.0.0.0 ElectionWare 6.0.1.0 ExpressVote Previewer 4.0.0.0 **Firmware** DS200 2.30.0.0 DS450 3.4.0.0 DS850 3.4.0.0 ExpressVote Universal Voting Device 4.0.0.0 **COTS** Operating System Windows 10 Enterprise/Windows Server 2016 Sumatra PDF 3.1.2 Symantec Endpoint Protection 14.2.0_MP1

State of Iowa
Approved Voting Systems

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Company Name and Address	Voting System Only the versions listed are approved for use in Iowa.
Election Systems and Software 11208 John Galt Blvd. Omaha, Nebraska 68137 (800) 247-8683 info@essvote.com	**EVS 6.0.5.0 - Approved 12-18-2019** **Software Version** ESS Event Log Service 1.6.0.0 Removable Media Service 1.5.1.0 ElectionWare 5.0.5.0 ExpressLink 1.5.0.0 ExpressVote Previewer 1.5.3.0 & 2.4.6.0 Regional Results 1.3.0.0. **Firmware** DS200 2.17.5.0 DS450 3.1.1.0 DS850 3.1.1.0 ExpressVote Universal Voting Device 1.5.3.0 & 2.4.6.0 **COTS** Operating System Windows 7 SP1/Windows Server 2008 R2 SP1 Adobe Acrobat Standard XI Symantec Endpoint Protection 14.2.0 MP1 Ceberus FTP Server 10.0.8 IPSwitch WS FTP 12 12.7.0 Kiwi Syslog Server 9.6.7 Cisco A5505 or A5506 X Firewall 9.17-32, 9.9.2-32 Cradlepoint Router 7.0.0

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Company Name and Address	Voting System Only the versions listed are approved for use in Iowa.
Election Systems and Software 11208 John Galt Blvd. Omaha, Nebraska 68137 (800) 247-8683 info@essvote.com	**EVS 5.3.4.0 - Approved 08-02-2018** **Software Version** ESS Event Log Service 1.5.5.0 Removable Media Service 1.4.5.0 ElectionWare 4.7.1.5 Paper Ballot 4.6.2.0 Election Reporting Manager 8.12.1.2 ExpressLink 1.3.0.0 ExpressVote Previewer 1.4.1.7 & 2.4.2.0 AutoMARK VAT Previewer 1.8.6.1 Regional Results 1.1.0.0. **Firmware** AutoMARK VAT 1.8.6.1. DS200 2.12.4.0 DS450 3.0.0.0 DS850 2.10.2.0 ExpressVote Universal Voting Device 1.4.1.7 & 2.4.2.0 **COTS** Operating System Windows 7 SP1/Windows Server 2008 R2SP1 Adobe Acrobat Standard XI Symantec Endpoint Protection 14.01 MP1 Ceberus FTP Server 9.0.3.1 (x64) IPSwitch WS FTP 12 12.6.0.3 RMCOBOL 12.06 Cisco A5505 Firewall 9.1.7.23 Cisco A5506X Firewall 9.6.4.3 Kiwi Syslog Server 9.6

State of Iowa
Approved Voting Systems

Exhibit B

Company Name and Address	Voting System Only the versions listed are approved for use in Iowa.
Election Systems and Software 11208 John Galt Blvd. Omaha, Nebraska 68137 (800) 247-8683 info@essvote.com	**EVS 5.3.2.0, Approved 03-29-2017** **Software Version** ESS Event Log Service 1.5.5.0 Removable Media Service 1.4.5.0 ElectionWare 4.7.1.3 Paper Ballot 4.6.1.0 Election Reporting Manager 8.12.1.2 ExpressLink 1.3.0.0 ExpressVote Previewer 1.4.1.2 AutoMARK VAT Previewer 1.8.6.1 Regional Results 1.1.0.0. **Firmware** AutoMARK VAT 1.8.6.1. DS200 2.12.3.0 DS450 3.0.0.0 DS850 2.10.2.0 ExpressVote Universal Voting Device 1.4.1.2 Micosoft .NET 3.5 3.5 **COTS** Windows 7 SP1/Windows Server 2008 R2SP1 Adobe Acrobat Standard XI Symantec Endpoint Protection 12.1.6 Ceberus FTP Server 8.0.8 IPSwitch WS FTP 12 12.5.1 Kiwi Syslog Server 9.4.2
Election Systems and Software 11208 John Galt Blvd. Omaha, Nebraska 68137 (800) 247-8683 info@essvote.com	**EVS 5.2.0.2, approved 05-28-2015** **Software** ElectionWare 4.6.0.0 ExpressPass v. 1.1.0.0 ExpressVote Previewer v. 1.4.0.0 Removable Media Service v. 1.4.5.0 AutoMARK VAT Previewer v. 1.8.6.0 Regional Results NA Election Reporting Manager v. 8.11.0.0 Event Log Service 1.5.5.0 **Hardware** AutoMARK VAT v. 1.8.6.0, hw v. 1.0, 1.1 & 1.3 DS200 v. 2.12.02, hw v. 1.2 & 1.3 DS850 v. 2.10.0.0, hw v. 1.0 ExpressVote v. 1.4.0.0, hw v. 1.0 Plastic Ballot Box, hw v. 1.2, 1.3 & 1.4 Steel Ballot Box, hw v. 1.0, 1.1 & 1.2 **COTS Software** Microsoft Windows 7 SP1 Microsoft Server 2008 R2 SP1 Symantec Endpoint Protection v. 12.1.4

State of Iowa

Exhibit B

Approved Voting Systems

Company Name and Address	Voting System Only the versions listed are approved for use in Iowa.
Election Systems and Software 11208 John Galt Blvd. Omaha, Nebraska 68137 (800) 247-8683 info@essvote.com	**Unity 3.4.1.1, approved 12-24-2014** **Software** Audit Manager v. 7.5.2.0 Election Data Manager v. 7.8.2.0 ESS Image Maker v. 7.7.2.0 AutoMARK Information Manager v. 1.3.257 AutoMARK VAT Previewer v. 1.3.2907 Hardware Programming Manager v. 5.9.1.0 Election Reporting Manager v. 7.9.1.0 Log Monitor Service v. 1.1.0.0 **Hardware** AutoMARK VAT v. 1.3.2907, hw v. 1.0, 1.1 & 1.3 Model 100 v. 5.4.4.5, hw v. 1.3 DS200 v. 1.7.1.0, hw v. 1.2 Model 650 v. 2.2.2.0, hw v. 1.1 & 1.2 DS850 v. 2.9.0.0, hw v. 1.0 Plastic Ballot Box, hw v. 1.2 & 1.3 Steel Ballot Box, hw v. 1.0, 1.1 & 1.2 **COTS Software** Cerberus FTP Server v. 6.0.6.0 IPSwitch WS_FTP 12 v. 12.4 Microsoft Windows 7 SP1 Microsoft Server 2008 R2
Election Systems and Software 11208 John Galt Blvd. Omaha, Nebraska 68137 (800) 247-8683 info@essvote.com	**Unity 3.4.0.1, approved 1/18/2013:** **Software:** Audit Manager, v. 7.5.2.0 Election Data Manager, v. 7.8.1.0 ESS Image Manager, v. 7.7.1.0 Hardware Programming Manager, v. 5.8.0.0 Election Reporting Manager, v. 7.8.0.0 AutoMARK Information Manager, v. 1.3.257 AutoMARK VAT Previewer, 1.3.2907 **Hardware:** Model 100 5.4.4.5, hw version 1.3 Model 650 v. 2.2.2.0, hw version 1.1 & 1.2 AutoMARK v. 1.3.2907, hw vrsns 1.0, 1.1 & 1.3 DS200 v. 1.6.0.0, hw version 1.2 DS850 v. 2.2.0.0, hw version 1.0 Plastic Ballot Box, hw version 1.2 & 1.3 Steel Ballot Box, hw version 1.0, 1.1 & 1.2 COTS Software: Cerberus FTP Server v. 4.0.9 IPSwitch WS_FTP 12 v. 12.3

Exhibit B

State of Iowa
Approved Voting Systems

Company Name and Address	Voting System Only the versions listed are approved for use in Iowa.
Election Systems and Software 11208 John Galt Blvd. Omaha, Nebraska 68137 (800) 247-8683 info@essvote.com	**Unity 3.0.1.1 Ammendement A** N-2-02-22-22-007, approved 12/13/2006: **Software:** Audit Manager, v. 7.3.0.0 Election Data Manager, v. 7.4.4.0 ES&S Image Manager, v. 7.4.2.0 IVotronic Image Manager, v. 2.0.1.0 Hardware Programming Manager, v. 5.2.4.0 Data Acquisition Manager, v. 6.0.0.0 Election Reporting Manager, v. 7.1.2.1 AutoMARK Information Management System, v. 1.2.18 **Hardware:** IVotronic RTAL booth 9.1.6.2 IVotronic 9.1.6.2 Model 100 5.2.1.0 Model 650 2.1.0.0 AutoMARK 1.1 (Model A200) Firmware v. 1.1.2258
Unisyn Voting Solutions 2310 Cousteau Court San Diego, CA 92081 1-760-734-3233 mktg@unisynvoting.com	**OpenElect 2.2 Approved 1-19-2022** **Software** Ballot Layout Manager (BLM) v2.2 Election Manager(EM) v2.2 Tabulator Client(TC) v2.2 Tabulator (Tab) v2.2 Tabulator Reports(TR) v2.2 OVCS Application v2.2 Auditor v2.2 Validator v2.2 **Hardware** OVO v2.2 FVT-Tablet Voting Device v2.2 FVT-B-Tablet Voting Device v2.2 OVI-VC- 15' Screen v2.2 OVCS mini v2.2 OVCS v2.2 OVO Ballot Box 1 v1.1 OVO Ballot Box 2 v1.2 FVS Ballot Box v1.0

Exhibit B

State of Iowa
Approved Voting Systems

Company Name and Address	Voting System Only the versions listed are approved for use in Iowa.
Unisyn Voting Solutions 2310 Cousteau Court San Diego, CA 92081 1-760-734-3233 mktg@unisynvoting.com	**OpenElect 2.1 Approved 11-25-2019** **Software** Ballot Layout Manager v2.1 Election Manager v.2.1 Software Server v.2.1 Election Server v.2.1 Tabulator Client v. 2.1 Tabulator v.2.1 Tabulator Reports v2.1 Adjudicator v2.1 Scriptor v2.1 Validator v. 2.1 **Hardware** OVO v 2.1, Hardware version Rev. A & E OVI, 15" Screens v.2.1, hardware ver. Rev. A, B & F FVT v. 2.1 OVCS v.2.1, hardware version v.2.1 – Central Scanner M160 OVCS v.2.1, hardware version v.2.1 – Central Scanner DRX10C OVO Ballot Box 1, hardware version 1.1 OVO Ballot Box 2, hardware version 1.2
Unisyn Voting Solutions 2310 Cousteau Court San Diego, CA 92081 1-760-734-3233 mktg@unisynvoting.com	**OpenElect 2.0 Approved 9-6-2017** **Software** Ballot Layout Manager v2.0 Election Manager v.2.0 Software Server v.2.0 Election Server v.2.0V OCSInstaller v.2.0 Tabulator Client v. 2.0 Tabulator v.2.0 Tabulator Reports 2.0 Validator v. 2.0 **Hardware** OVO v 2.0, Hardware version Rev. A & E OVI, 15" Screens v.2.0, hardware ver. Rev. A, B & F FVT v. 2.0 OVCS v.2.0, hardware version v.2.0 OVO Ballot Box 1, hardware version 1.1 OVO Ballot Box 2, hardware version 1.2 OVO Ballot Box 3, hardware version 1.2 OVO Ballot Box 4, hardware version 1.2 OVO Ballot Box 5, hardware version 1.3 OVO Ballot Box 6, hardware version 1.3

State of Iowa

Exhibit B

Approved Voting Systems

Company Name and Address	Voting System Only the versions listed are approved for use in Iowa.
Unisyn Voting Solutions 2310 Cousteau Court San Diego, CA 92081 1-760-734-3233 mktg@unisynvoting.com	**OpenElect 1.3.3m Approved 3-6-2016** **Software** Ballot Layout Manager v1.3 Election Manager v.1.3.M Software Server v.1.3 Election Server v.1.3 OCSInstaller v.1.3.3.M Tabulator Client v. 1.3.M Tabulator v.1.3.3.M Tabulator Reports v.1.3 Validator v. 1.3.3.M **Hardware** OVO v 1.3.3.M, Hardware version Rev. A & E OVI, 7" & 15" Screens v.1.3, hardware version Rev. A, B & F OVCS v.1.3, hardware version v.1.3 OVO Ballot Box 1, hardware version 1.1 OVO Ballot Box 2, hardware version 1.2 OVO Ballot Box 3, hardware version 1.2 OVO Ballot Box 4, hardware version 1.2 OVO Ballot Box 5, hardware version 1.3 OVO Ballot Box 6, hardware version 1.3
Unisyn Voting Solutions 2310 Cousteau Court San Diego, CA 92081 1-760-734-3233 mktg@unisynvoting.com	**Open Elect 1.3m, approved 05-28-2015** **Software** Ballot Layout Manager v1.3 Election Manager v.1.3m Software Server v.1.3 Election Server 1.3 Tabulator Client v. 1.3m Tabulator v.1.3 Tabulator Reports v.1.3 Scripter v.1.3 & 1.3m Validator v. 1.3 & 1.3m **Hardware** OVO v 1.3m, Hardware version Rev. A & E OVI, 7" & 15" Screens v.1.3, hardware version Rev. A, B & F OVCS v.1.3, hardware version v.1.3 OVO Ballot Box 1, hardware version 1.1 OVO Ballot Box 2, hardware version 1.2 OVO Ballot Box 3, hardware version 1.2 OVO Ballot Box 4, hardware version 1.2 OVO Ballot Box 5, hardware version 1.3 OVO Ballot Box 6, hardware version 1.3

State of Iowa

Exhibit B

Approved Voting Systems

Company Name and Address	**Voting System** **Only the versions listed are approved for use in Iowa.**
Unisyn Voting Solutions 2310 Cousteau Court San Diego, CA 92081 1-760-734-3233 mktg@unisynvoting.com	**OpenElect 1.3, approved 12/23/2014:** **Software** OpenElect OVI with firmware v 1.3 OpenElect OVCS with firmware v. 1.3 Ballot Layout Manager v. 1.3 Election Manager v. 1.3 Software Server v. 1.3 Election Server v. 1.3 Tabulator Client v. 1.3 Tabulator v. 1.3 Tabulator Reports v. 1.3 Scripter v. 1.3 Validator v. 1.3

State of Iowa

Exhibit B

Approved Voting Systems

Company Name and Address	Voting System Only the versions listed are approved for use in Iowa.
Dominion Voting Systems, Inc. 1201 18th St., Suite 210 Denver Colorado, 80202	**Democracy Suite 5.5C and 5.5-CS Approved June 17, 2021** ImageCast Precinct Optical Scan System – Hardware model PCOS-320C with application software version (firmware) 5.5.41.3 ImageCast Precinct 2 Optical Scan System – Hardware model PCOS-330A version (firmware) 5.5.2.1 ImageCast X Prime BMD 21" – Model: aValue HID-21V-BTX-B1R: Version (firmware) 5.5.15.2 Printer Model: HP M402dne Printer ImageCast Precinct Optical Scan System (model PCOS-320C) ImageCast Central, version 5.5.41.0002 – Scanners Models: Canon DR-G2140 (COTS), Canon DR-G1130 (COTS), and Canon DR-M160-II (COTS) Microsoft Windows, Consisting of the following components; • MS Windows Server 2012 R2 Standard • MS Windows 10 Professional version 1909 Democracy Suite 5.5.40.2 (5.5-CS) consisting of the following software components: o EMS Audio Studio, version 5.5.40.2 • EMS Election Data Translator, version 5.5.40.2 • EMS Election Event Designer, version 5.5.40.2 • ImageCast Voter Activation, version 5.5.40.2 • MS Results Tally and Reporting, version 5.5.40.2 Adjudication software, version 5.5.40.1 Prerequisite software o Cepstral 6.2 • Adobe Reader • iButton device driver o Java 7u80 • Java 8u144 • MS SQL Server 2016 Express with Service Pack 2 Visual J# • SQL Server Management Studio o Microsoft Visual C++ 2015 Please note that the Democracy Suite 5.5-CS system configuration includes all of the components of the Democracy Suite 5.5-C system, with the addition of the following component. ImageCast Precinct Optical Scan System (model PCOS-320C) BMD printer HP 7110

State of Iowa
Approved Voting Systems

Exhibit B

Company Name and Address	Voting System Only the versions listed are approved for use in Iowa.
Dominion Voting Systems, Inc. 1201 18th St., Suite 210 Denver Colorado, 80202	**Democracy Suite 5.0 Approved 9-18-2017** ImageCast Precinct Optical Scan System Hardware model 320A/320C with application software version (firmware) 5.0.1 US ImageCast X Ballot Marking Device - Hardware model DTS-15V-Z37 (aValue) and BiMD printer HP M402dne (COTS), version 5.0.6149.28963 ImageCast Central, Scanners DR-G1130 (COTS) and DRMI 6011 (COTS), version 5.0.1-0001 Microsoft Windows components; MS Windows Server 2012 R_2 Standard MS Windows 8.1 Professional Democracy Suites 5.0.15.1, components; EMS Audio Studio, version 5.0.15.1 EMS Election Data Translator, version 5.0.15.1 EMS Election Event Designer, version 5.0.15.1 ImageCast Voter Activation, version 5.0.15.1 EMS Results Tally and Reporting, version 5.0.15.1 **Other Software;** Cepstral 6.2 Adobe Reader Java 7u76 Java 8u77 Microsoft Visual J# Microsoft Visual C++ 2013

United States Election Assistance Commission

U.S. Election Assistance Commission
VSTL

Certificate of Accreditation

Wyle Laboratories, Inc.
Huntsville, Alabama

is recognized by the U.S. Election Assistance Commission for the testing of voting systems to the 2005 Voluntary Voting Systems Guidelines under the criteria set forth in the EAC Voting System Testing and Certification Program and Laboratory Accreditation Program. Wyle is also recognized as having successfully completed assessments by the National Voluntary Laboratory Accreditation Program for conformance to the requirements of ISO/IEC 17025 and the criteria set forth in NIST Handbooks 150 and 150-22.

Effective Through

April 27, 2012

Donetta Davidson Date: 5/04//10

Chair, U.S. Election Assistance Commission

EAC Lab Code: **0704**

United States Election Assistance Commission

Certificate of Accreditation

SLI Compliance,
Division of Gaming Laboratories International, LLC
Wheat Ridge, Colorado

is recognized by the U.S. Election Assistance Commission for the testing of voting systems to the 2002 Voting Systems Standards, the Voluntary Voting Systems Guidelines versions 1.0 and 1.1 under the criteria set forth in the EAC Voting System Testing and Certification Program and Laboratory Accreditation Program. SLI Compliance is also recognized as having successfully completed assessments by the National Voluntary Laboratory Accreditation Program for conformance to the requirements of ISO/IEC 17025 and the criteria set forth in NIST Handbooks 150 and 150-22.

Effective Through

January 10, 2021

Date: 1/10/18

Brian Newby,
Executive Director, U.S. Election Assistance Commission

EAC Lab Code: **0701**

United States Election Assistance Commission

Certificate of Accreditation

Pro V&V, Inc.
Huntsville, Alabama

is recognized by the U.S. Election Assistance Commission for the testing of voting systems to the 2005 Voluntary Voting Systems Guidelines under the criteria set forth in the EAC Voting System Testing and Certification Program and Laboratory Accreditation Program. Pro V&V is also recognized as having successfully completed assessments by the National Voluntary Laboratory Accreditation Program for conformance to the requirements of ISO/IEC 17025 and the criteria set forth in NIST Handbooks 150 and 150-22.

Effective Through

February 24, 2017

Date: 2/24/15

Acting Executive Director, U.S. Election Assistance Commission

EAC Lab Code: **1501**

United States Election Assistance Commission

Certificate of Conformance

Unisyn OpenElect 1.3 (Modification)

The voting system identified on this certificate has been evaluated at an accredited voting system testing laboratory for conformance to the 2005 *Voluntary Voting System Guidelines (2005 VVSG)*. Components evaluated for this certification are detailed in the attached Scope of Certification document. This certificate applies only to the specific version and release of the product in its evaluated configuration. The evaluation has been verified by the EAC in accordance with the provisions of the EAC *Voting System Testing and Certification Program Manual* and the conclusions of the testing laboratory in the test report are consistent with the evidence adduced. This certificate is not an endorsement of the product by any agency of the U.S. Government and no warranty of the product is either expressed or implied.

Product Name: OpenElect

Model or Version: Version 1.3 (Modification)

Name of VSTL: NTS Huntsville

EAC Certification Number: 04211950-1.3

Date Issued: 01/12/2015

Chief Operating Officer & Acting Executive Director
U.S. Election Assistance Commission

Scope of Certification Attached

Manufacturer:	*Unisyn Voting Solutions, Inc.*	**Laboratory:**	*NTS Huntsville*
System Name:	*OpenElect Voting System 1.3*	**Standard:**	*VVSG 1.0 (2005)*
Certificate:	*04211950-1.3*	**Date:**	*01/12/2015*

Scope of Certification

This document describes the scope of the validation and certification of the system defined above. Any use, configuration changes, revision changes, additions or subtractions from the described system are not included in this evaluation.

Significance of EAC Certification

An EAC certification is an official recognition that a voting system (in a specific configuration or configurations) has been tested to and has met an identified set of Federal voting system standards. An EAC certification is **not**:

- An endorsement of a Manufacturer, voting system, or any of the system's components.
- A Federal warranty of the voting system or any of its components.
- A determination that a voting system, when fielded, will be operated in a manner that meets all HAVA requirements.
- A substitute for State or local certification and testing.
- A determination that the system is ready for use in an election.
- A determination that any particular component of a certified system is itself certified for use outside the certified configuration.

Representation of EAC Certification

Manufacturers may not represent or imply that a voting system is certified unless it has received a Certificate of Conformance for that system. Statements regarding EAC certification in brochures, on Web sites, on displays, and in advertising/sales literature must be made solely in reference to specific systems. Any action by a Manufacturer to suggest EAC endorsement of its product or organization is strictly prohibited and may result in a Manufacturer's suspension or other action pursuant to Federal civil and criminal law.

System Overview:

The Unisyn OpenElect Voting System 1.3, herein referred to as OVS 1.3, is a modification to the certified OVS 1.2. The OVS 1.3 Voting System is a paper-ballot based optical scan voting system consisting of four major components:

1. OpenElect Central Suite (OCS)
2. OpenElect Voting Optical (OVO)
3. OpenElect Voting Interface (OVI-7 or OVI-VC)
4. OpenElect Voting Central Scan (OVCS)

The Unisyn OVS 1.3 voting system Technical Data Package (TDP) was the source for much of the information in this document.

OpenElect Central Suite (OCS)

The OCS consists of the eight components running as either a front-end/client application or as a back-end/server application: Ballot Layout Manager (BLM), Election Manager (EM), Election Server (ES), Tabulator Client (TC), Tabulator, Adjudicator, Tabulator Reports (TR) and Software Server (SS).

OpenElect Voting Optical (OVO)

The OVO device is a precinct-level optical scan ballot counter (tabulator) designed to perform the following major functions: ballot scanning, tabulation, and second chance voting.

The OVO is a full-page, dual-sided optical scan ballot system which scans and validates voter ballots and provides a summary of all ballots cast. The election is loaded from the OVS Election Server over a secure local network or via a USB thumb drive. On Election Day, an OVO at each polling location scans and validates voters' ballots, and provides precinct tabulation and reporting. The OVO unit is also paired with the OVI for early voting to scan and tabulate early voting ballots. OVO units can also be used at election headquarters to read absentee, provisional, or recount ballots in smaller jurisdictions.

OpenElect Voting Interface (OVI)

The OVI supports both ADA and Early Voting requirements. The OVI enables voters during early voting to cast regional ballots and voters with special needs to prepare their ballots independently and privately on Election Day. The OVI unit features a 7-inch or optional 15-inch full-color touch-screen display. The OVI will present each contest on the correct ballot to the voter in visual and (optionally) audio formats. The voter with limited vision navigates through the ballot using the audio ballot and the ADA keypad or touchscreen input to make their selections. The voter validates his or her selections by listening to the audio summary, printing the ballot, and inserting it into the OVO. Two OVI models are included in the OVS 1.3 voting system, the OVI-7 which has a 7" LCD screen and the OVI-VC which has a 15" LCD screen.

The OVI facilitates special needs voters through a variety of methods including wheelchair access, sip & puff, zoom-in ballot function, and audio assistance for the visually impaired. The OVI provides for write-in candidates when authorized by the jurisdiction. Voters input candidates' names via the ADA keypad, touchscreen or sip & puff device. Each OVI can support multiple languages for both visual and audio ballots, allowing the voter to choose their preferred language.

OpenElect Voting Central Scanner (OVCS)

The OVCS resides at election headquarters designated to read absentee, provisional, or recount ballots in large jurisdictions, or read the entire election's ballots at a central count location in smaller jurisdictions. The OVCS also captures write-in data images and produces a write-in

image report for manual processing upon request. The OVCS system consists of the following components: OVCS Workstation and Canon DR-X10C Scanner.

Certified System before Modification:

Unisyn Voting Solutions OpenElect 1.0
Certificate ID: UNS10121966-OE

Unisyn Voting Solutions OpenElect 1.0.1
Certificate ID: UNS10121966-OE-WI

Unisyn Voting Solutions OpenElect 1.1
Certificate ID: UNS10121966-OE-1.1

Unisyn Voting Solutions OpenElect 1.2
Certificate ID: UNS10121966-OE-1.2

Anomalies and/or Additions addressed in OpenElect 1.3:

The OVS 1.3 provides enhancements from the OVS 1.2 to the OVS 1.3 system. This update includes functional and hardware modifications to the EMS, OVO, OVI, and OVCS.

Mark definition:

The Unisyn Open Elect system will consistently recognize a 1mm wide line across the full length of the target area. Marks must be made with a marking device with sufficiently low reflectance in the visible red band and is of sufficient density/color such that the scanner registers it as black. Most blue, black and green ballpoint pens and markers also meet necessary reflectance requirements and may be used.

Tested Marking Devices:

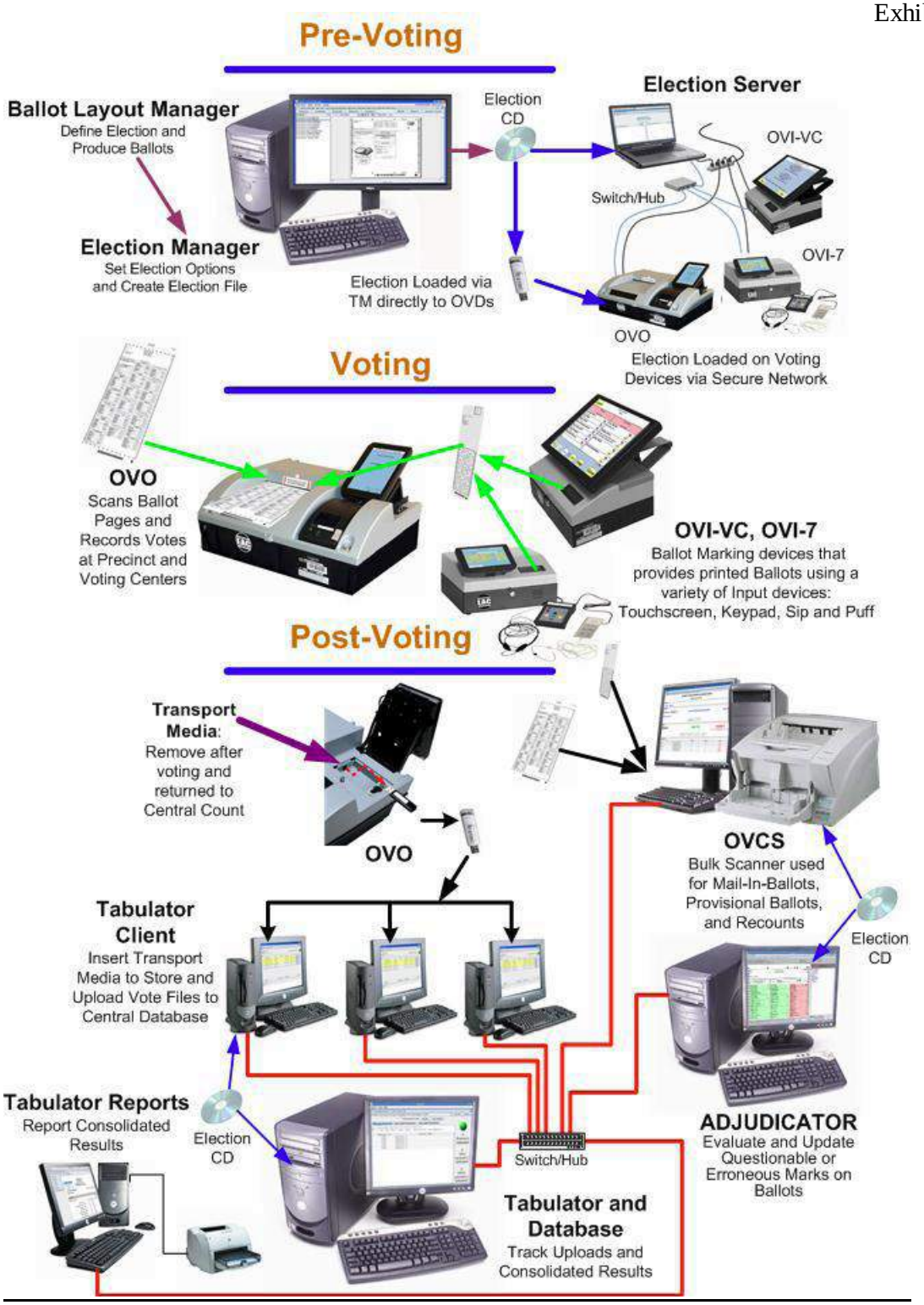
- BIC Grip Roller
- EF Felt Tip Pen

Language capability:

System supports Armenian, Cambodian, Chinese (Cantonese and Mandarin dialects), English, Japanese, Korean, Russian, Spanish, Tagalog, and Vietnamese.

Components Included:

This section provides information describing the components and revision level of the primary components included in this Certification.



System Component	Software or Firmware Version	Hardware Version	Operating System or COTS	Comments
OVO	1.3.0	Rev A, E	Linux CentOS 5.0, 6.3	
OVI-7	1.3.0	Rev F	Linux CentOS 5.0	

System Component	Software or Firmware Version	Hardware Version	Operating System or COTS	Comments
OVI-VC	1.3.0	Rev A, B	Linux CentOS 5.0, 6.3	
OVCS	1.3.0	ImageFORMULA DR-X10C	Linux CentOS 5.7, 6.5	
Adjudicator	1.3.0			
Ballot Layout Manager	1.3.0			
Common (Library)	1.3.0			
Election Manager	1.3.0			
Election Server	1.3.0			
OCS Installer	1.3.0			
Regkey Builder	1.3.0			
Software Server	1.3.0			
Tabulator	1.3.0			
Tabulator Client	1.3.0			
Tabulator Reports	1.3.0			
OVCS Application	1.3.0			
OVI Firmware	1.3.0			
OVO Firmware	1.3.0			
Scripter	1.3.0			
Validator	1.3.0			
Logger (Library)	1.3.0			
COTS Components				
CentOS Linux	5.0, 5.7, 6.3, 6.5			
Java JRE + Unlimited Cryptographic Extension	1.6.0_02			
Apache Tomcat Application Server	6.0.13			
MySQL Database	5.0.45-7, 5.1.71-1			
JasperReports	2.0.5			
Desktop for non-redundant solutions		Dell OptiPlex		
Desktop for redundant solutions		Dell Precision		
Canon Scanner		Canon DR-X10C		
Transport Media		STEC- Industrial Grade		

System Component	Software or Firmware Version	Hardware Version	Operating System or COTS	Comments
Laptop		Dell Latitude	COTS	

System Limitations

This table depicts the limits the system has been tested and certified to meet.

Characteristic	Limiting Component	Limit	Comment
Maximum Elections	BLM	8	
Maximum Precincts	BLM	2000	
Maximum Splits per Precinct	BLM	9	
Maximum Districts	BLM	400	
Maximum Contests per District	BLM	20	
Maximum Parties	BLM	24	
Maximum Parties in primary	BLM	12	
Maximum Parties w/ Straight Ticket	BLM	12	
Maximum District types	BLM	25	
Maximum Languages	BLM	15	
Maximum Ballot styles per Election	BLM	400	
Maximum Contests per Election	BLM	150	
Maximum Measures per Election	BLM	30	
Maximum Instruction Blocks per Election	BLM	5	
Maximum Headers per Election	BLM	50	
Maximum Candidates per Contest	BLM	120	
Maximum Ballot Pages	BLM	3	
Maximum Votes for N of M	BLM	25	
Maximum Ballot sheets per OVO	BLM	5000	
Maximum Units simultaneously loading	BLM	20	
Maximum Precincts initialized per OVO on Election Day	BLM	30	
Maximum Precincts initialized per OVI-7/OVI-VC on Election Day	BLM	2000	
Maximum Precincts initialized per OVO/OVI-7/OVI-VC in early voting	BLM	2000	
Maximum 11″ Ballot positions	BLM	38 x 3	Limit
Maximum 14″ Ballot positions	BLM	50 x 3	Limit
Maximum 17″ Ballot positions	BLM	62 x 3	Limit
Maximum 19″ Ballot positions	BLM	70 x 3	Limit

Functionality

2005 VVSG Supported Functionality Declaration

Feature/Characteristic	Yes/No	Comment
Voter Verified Paper Audit Trails		
VVPAT	No	Not applicable
Accessibility		
Forward Approach	No	
Parallel (Side) Approach	No	
Closed Primary		
Primary: Closed	Yes	
Open Primary		
Primary: Open Standard (provide definition of how supported)	Yes	A registered voter may vote in any *party primary* regardless of his own party affiliation
Primary: Open Blanket (provide definition of how supported)	No	
Partisan & Non-Partisan:		
Partisan & Non-Partisan: Vote for 1 of N race	Yes	
Partisan & Non-Partisan: Multi-member ("vote for N of M") board races	Yes	
Partisan & Non-Partisan: "vote for 1" race with a single candidate and write-in voting	Yes	
Partisan & Non-Partisan "vote for 1" race with no declared candidates and write-in voting	Yes	
Write-In Voting:		
Write-in Voting: System default is a voting position identified for write-ins.	Yes	
Write-in Voting: Without selecting a write in position.	No	
Write-in: With No Declared Candidates	Yes	
Write-in: Identification of write-ins for resolution at central count	Yes	
Primary Presidential Delegation Nominations & Slates:		
Primary Presidential Delegation Nominations: Displayed delegate slates for each presidential party	Yes	
Slate & Group Voting: one selection votes the slate.	No	
Ballot Rotation:		
Rotation of Names within an Office; define all supported rotation methods for location on the ballot and vote tabulation/reporting	Yes	Top to Bottom By Precinct grouping
Straight Party Voting:		
Straight Party: A single selection for partisan races in a general election	Yes	
Straight Party: Vote for each candidate individually	Yes	
Straight Party: Modify straight party selections with crossover votes	Yes	
Straight Party: A race without a candidate for one party	Yes	
Straight Party: "N of M race (where "N">1)	Yes	

Feature/Characteristic	Yes/No	Comment
Straight Party: Excludes a partisan contest from the straight party selection	Yes	
Cross-Party Endorsement:		
Cross party endorsements, multiple parties endorse one candidate.	No	
Split Precincts:		
Split Precincts: Multiple ballot styles	Yes	
Split Precincts: P & M system support splits with correct contests and ballot identification of each split	Yes	
Split Precincts: DRE matches voter to all applicable races.	No	
Split Precincts: Reporting of voter counts (# of voters) to the precinct split level; Reporting of vote totals is to the precinct level	Yes	
Vote N of M:		
Vote for N of M: Counts each selected candidate, if the maximum is not exceeded.	Yes	
Vote for N of M: Invalidates all candidates in an overvote (paper)	Yes	
Recall Issues, with options:		
Recall Issues with Options: Simple Yes/No with separate race/election. (Vote Yes or No Question)	Yes	
Recall Issues with Options: Retain is the first option, Replacement candidate for the second or more options (Vote 1 of M)	Yes	
Recall Issues with Options: Two contests with access to a second contest conditional upon a specific vote in contest one. (Must vote Yes to vote in 2nd contest.)	No	
Recall Issues with Options: Two contests with access to a second contest conditional upon any vote in contest one. (Must vote Yes to vote in 2nd contest.)	No	
Cumulative Voting		
Cumulative Voting: Voters are permitted to cast, as many votes as there are seats to be filled for one or more candidates. Voters are not limited to giving only one vote to a candidate. Instead, they can put multiple votes on one or more candidate.	No	
Ranked Order Voting		
Ranked Order Voting: Voters can write in a ranked vote.	Yes	
Ranked Order Voting: A ballot stops being counting when all ranked choices have been eliminated	Yes	
Ranked Order Voting: A ballot with a skipped rank counts the vote for the next rank.	Yes	

Feature/Characteristic	Yes/No	Comment
Ranked Order Voting: Voters rank candidates in a contest in order of choice. A candidate receiving a majority of the first choice votes wins. If no candidate receives a majority of first choice votes, the last place candidate is deleted, each ballot cast for the deleted candidate counts for the second choice candidate listed on the ballot. The process of eliminating the last place candidate and recounting the ballots continues until one candidate receives a majority of the vote	Yes	
Ranked Order Voting: A ballot with two choices ranked the same, stops being counted at the point of two similarly ranked choices.	Yes	
Ranked Order Voting: The total number of votes for two or more candidates with the least votes is less than the votes of the candidate with the next highest number of votes, the candidates with the least votes are eliminated simultaneously and their votes transferred to the next-ranked continuing candidate.	Yes	
Provisional or Challenged Ballots		
Provisional/Challenged Ballots: A voted provisional ballots is identified but not included in the tabulation, but can be added in the central count.	Yes	
Provisional/Challenged Ballots: A voted provisional ballots is included in the tabulation, but is identified and can be subtracted in the central count	No	
Provisional/Challenged Ballots: Provisional ballots maintain the secrecy of the ballot.	Yes	
Overvotes (must support for specific type of voting system)		
Overvotes: P & M: Overvote invalidates the vote. Define how overvotes are counted.	Yes	Supported. Overvotes are tabulated for each office as an Over / Under Vote report in Vote Tabulation
Overvotes: DRE: Prevented from or requires correction of overvoting.	No	
Overvotes: If a system does not prevent overvotes, it must count them. Define how overvotes are counted.	No	
Overvotes: DRE systems that provide a method to data enter absentee votes must account for overvotes.	No	
Undervotes		
Undervotes: System counts undervotes cast for accounting purposes	Yes	Supported. Undervotes are tabulated for each office as an Over / Under Vote report in Vote Tabulation

Feature/Characteristic	Yes/No	Comment
Blank Ballots		
Totally Blank Ballots: Any blank ballot alert is tested.	Yes	
Totally Blank Ballots: If blank ballots are not immediately processed, there must be a provision to recognize and accept them	Yes	
Totally Blank Ballots: If operators can access a blank ballot, there must be a provision for resolution.	Yes	
Display/Printing Multi-Lingual Ballots		
Spanish	Yes	
Alaska Native (Other Group specified)	No	
Aleut	No	
Athabascan	No	
Eskimo	No	
Native (Other Group Specified)	No	
Chinese	Yes	
Filipino	Yes	
Japanese	Yes	
Korean	Yes	
Vietnamese	Yes	
Apache	No	
Cent/So American	No	
Cheyenne	No	
Chickasaw	No	
Choctaw	No	
Navajo	No	
Other Tribe-Specified	No	
Paiute	No	
Pueblo	No	
Seminole	No	
Shoshone	No	
Sioux	No	
Tohono O'Odham	No	
Tribe not specified	No	
Ute	No	
Yaqui	No	
Yuman	No	
Demonstrates the voting system capability to handle the designated language groups		
Default language (English)	Yes	
Secondary language using a Western European font	Yes	
Ideographic language (such as Chinese or Korean),	Yes	
Non-written languages requiring audio support	Yes	

Baseline Certification Engineering Change Order's (ECO)

Exhibit F

This table depicts the ECO's certified with the voting system:

Change ID	Date	Component	Description	Inclusion
ECO 16922	12/19/2014	OVO	New power brick for the Citizen thermal printer	Mandatory
ECO 1016	12/19/2014	OVO	Added a new power brick for the PDI scanner	Mandatory
EAC 1017	12/19/2014	OVI, OVI-VC	Power supply change for start printer	Mandatory

United States Election Assistance Commission

Certificate of Conformance

ES&S EVS 5.2.0.0

The voting system identified on this certificate has been evaluated at an accredited voting system testing laboratory for conformance to the 2005 *Voluntary Voting System Guidelines (2005 VVSG)*. Components evaluated for this certification are detailed in the attached Scope of Certification document. This certificate applies only to the specific version and release of the product in its evaluated configuration. The evaluation has been verified by the EAC in accordance with the provisions of the EAC *Voting System Testing and Certification Program Manual* and the conclusions of the testing laboratory in the test report are consistent with the evidence adduced. This certificate is not an endorsement of the product by any agency of the U.S. Government and no warranty of the product is either expressed or implied.

Product Name: EVS

Model or Version: 5.2.0.0

Name of VSTL: NTS Huntsville

EAC Certification Number: ESSEVS5200

Date Issued: 7/2/2014

Chief Operating Officer & Acting Executive Director
U.S. Election Assistance Commission

Scope of Certification Attached

United States Election Assistance Commission

Certificate of Conformance

ES&S Unity 3.4.1.0

Election Systems & Software

2002 VSS EAC CERTIFIED

The voting system identified on this certificate has been evaluated at an accredited voting system testing laboratory for conformance to the *2002 Voting System Standards (2002 VSS)* . Components evaluated for this certification are detailed in the attached Scope of Certification document. This certificate applies only to the specific version and release of the product in its evaluated configuration. The evaluation has been verified by the EAC in accordance with the provisions of the EAC *Voting System Testing and Certification Program Manual* and the conclusions of the testing laboratory in the test report are consistent with the evidence adduced. This certificate is not an endorsement of the product by any agency of the U.S. Government and no warranty of the product is either expressed or implied.

Product Name: Unity

Model or Version: Version 3.4.1.0

Name of VSTL: NTS

EAC Certification Number: ESSUnity3410

Date Issued: April 4, 2014

Chief Operating Officer & Acting Executive Director
U.S. Election Assistance Commission

Scope of Certification Attached

United States Election Assistance Commission

Certificate of Conformance

ES&S EVS 5.2.3.0

VVSG 2005 VER. I

EAC CERTIFIED

The voting system identified on this certificate has been evaluated at an accredited voting system testing laboratory for conformance to the 2005 *Voluntary Voting System Guidelines (2005 VVSG)*. Components evaluated for this certification are detailed in the attached Scope of Certification document. This certificate applies only to the specific version and release of the product in its evaluated configuration. The evaluation has been verified by the EAC in accordance with the provisions of the EAC *Voting System Testing and Certification Program Manual* and the conclusions of the testing laboratory in the test report are consistent with the evidence adduced. This certificate is not an endorsement of the product by any agency of the U.S. Government and no warranty of the product is either expressed or implied.

Product Name: ES&S Voting System (EVS)

Model or Version: 5.2.3.0

Name of VSTL: SLI Compliance

EAC Certification Number: ESSEVS5230

Date Issued: February 8, 2018

Executive Director
U.S. Election Assistance Commission

Scope of Certification Attached

United States Election Assistance Commission

Certificate of Conformance

Unisyn OpenElect 2.0

The voting system identified on this certificate has been evaluated at an accredited voting system testing laboratory for conformance to the 2005 *Voluntary Voting System Guidelines (2005 VVSG)* . Components evaluated for this certification are detailed in the attached Scope of Certification document. This certificate applies only to the specific version and release of the product in its evaluated configuration. The evaluation has been verified by the EAC in accordance with the provisions of the EAC *Voting System Testing and Certification Program Manual* and the conclusions of the testing laboratory in the test report are consistent with the evidence adduced. This certificate is not an endorsement of the product by any agency of the U.S. Government and no warranty of the product is either expressed or implied.

Product Name: OpenElect

Model or Version: Version 2.0

Name of VSTL: Pro V&V

EAC Certification Number: UNS10121966-2.0

Date Issued: 10/17/2017

Executive Director
U.S. Election Assistance Commission

Scope of Certification Attached

United States Election Assistance Commission

Certificate of Conformance

Dominion Democracy Suite 5.0

The voting system identified on this certificate has been evaluated at an accredited voting system testing laboratory for conformance to the 2005 *Voluntary Voting System Guidelines (2005 VVSG)* . Components evaluated for this certification are detailed in the attached Scope of Certification document. This certificate applies only to the specific version and release of the product in its evaluated configuration. The evaluation has been verified by the EAC in accordance with the provisions of the EAC *Voting System Testing and Certification Program Manual* and the conclusions of the testing laboratory in the test report are consistent with the evidence adduced. This certificate is not an endorsement of the product by any agency of the U.S. Government and no warranty of the product is either expressed or implied.

Product Name: Democracy Suite

Model or Version: 5.0

Name of VSTL: Pro V&V

EAC Certification Number: DVS-DemSuite-5.0

Date Issued: February 8, 2017

Executive Director
U.S. Election Assistance Commission

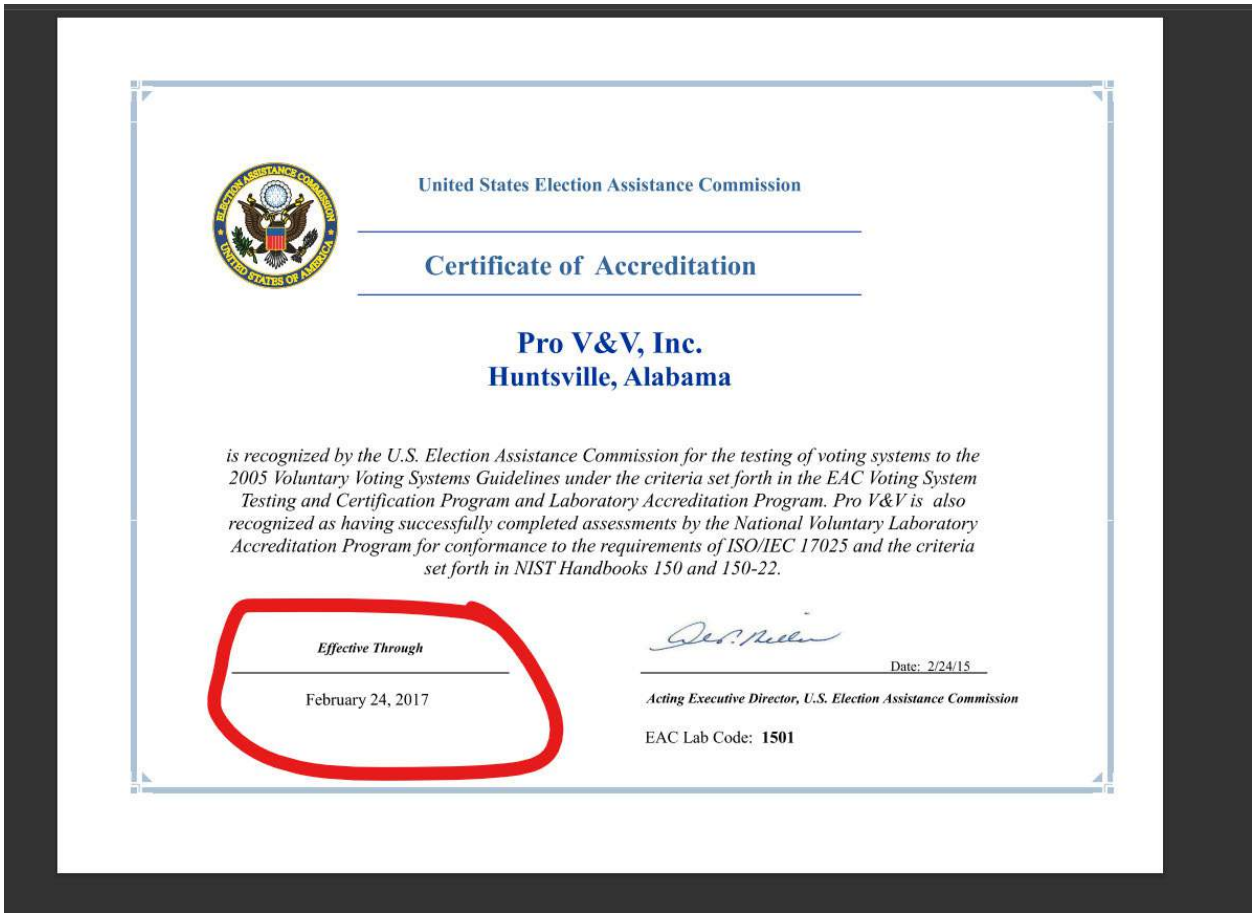
Scope of Certification Attached

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.



United States Election Assistance Commission

Certificate of Accreditation

Pro V&V, Inc.
Huntsville, Alabama

is recognized by the U.S. Election Assistance Commission for the testing of voting systems to the 2005 Voluntary Voting Systems Guidelines under the criteria set forth in the EAC Voting System Testing and Certification Program and Laboratory Accreditation Program. Pro V&V is also recognized as having successfully completed assessments by the National Voluntary Laboratory Accreditation Program for conformance to the requirements of ISO/IEC 17025 and the criteria set forth in NIST Handbooks 150 and 150-22.

Effective Through

February 24, 2017

Date: 2/24/15

Acting Executive Director, U.S. Election Assistance Commission

EAC Lab Code: **1501**

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.

10. 

United States Department of Commerce
National Institute of Standards and Technology

NVLAP®

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

For the National Voluntary Laboratory Accreditation Program

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).

U.S. Election Assistance Commission

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

13.

WISCONSIN

State Participation:	**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.
Applicable Statute(s):	"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).
Applicable Regulation(s):	"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).
State Certification Process:	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) referenda 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).
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://elections.state.wi.us/section.asp?linkid=643&locid=47

14.

U.S. Election Assistance Commission

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/

15.

U.S. Election Assistance Commission

PENNSYVANIA

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

16.

U.S. Election Assistance Commission

ARIZONA

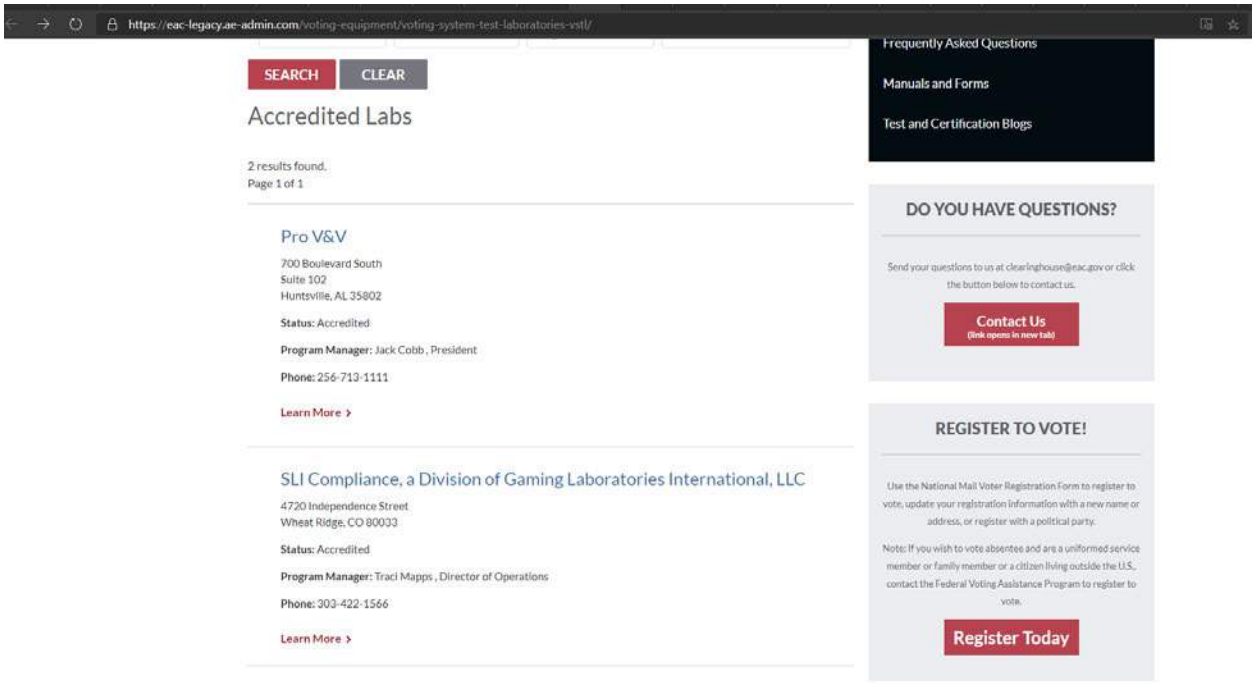
State Participation:	**Requires Testing by a Federally Accredited Laboratory.** AZ requires that its voting systems are HAVA compliant and approved by a laboratory that is accredited pursuant to HAVA.
Applicable Statute(s):	"On completion of acquisition of machines or devices that comply with HAVA, machines 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

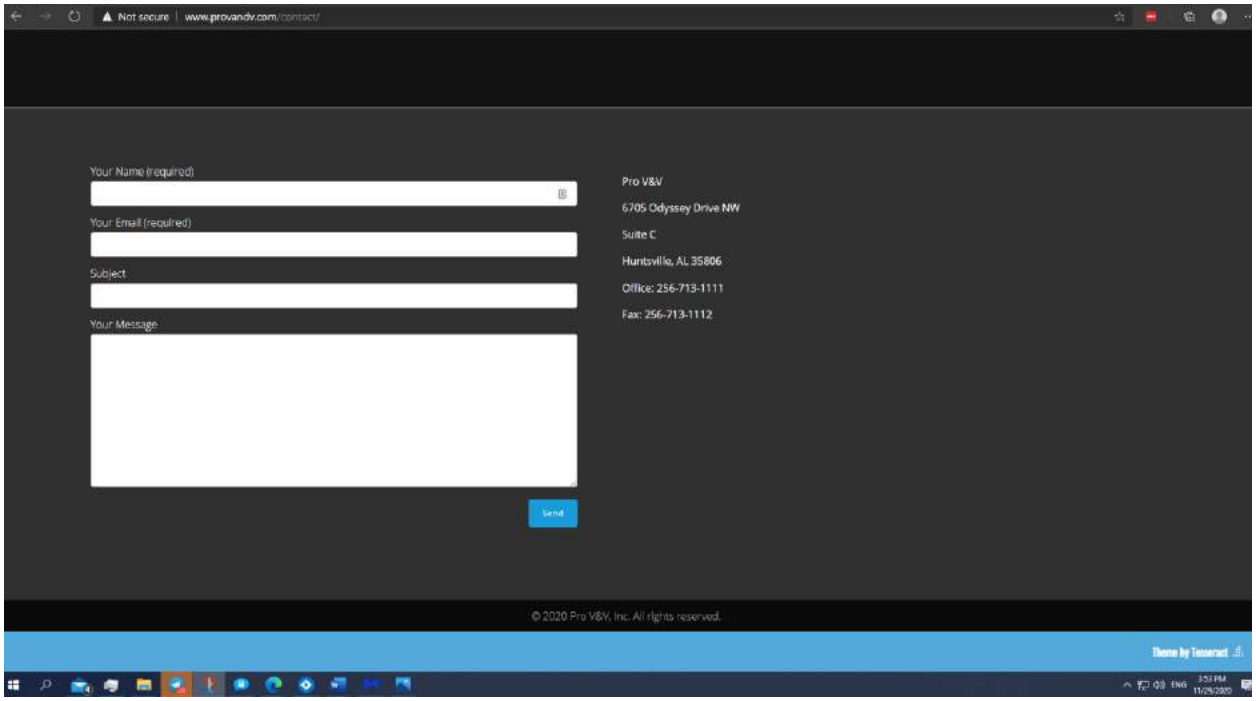
State Participation in EAC Voting System Certification Program 9

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.





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 (NASED). 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. They 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

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NCI Tower
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Beijing 100022
China
Telephone: 86-10-8523-3097
Fax: 86-10-8523-3001
Regional Manager: Stuart Spiteri

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The Executive Centre Japan K.K.
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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
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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
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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
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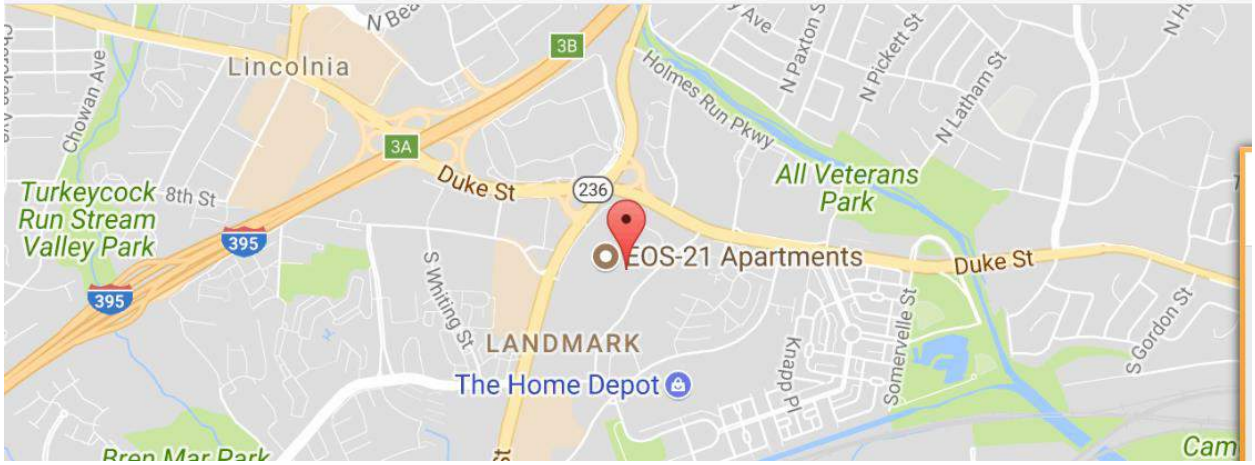
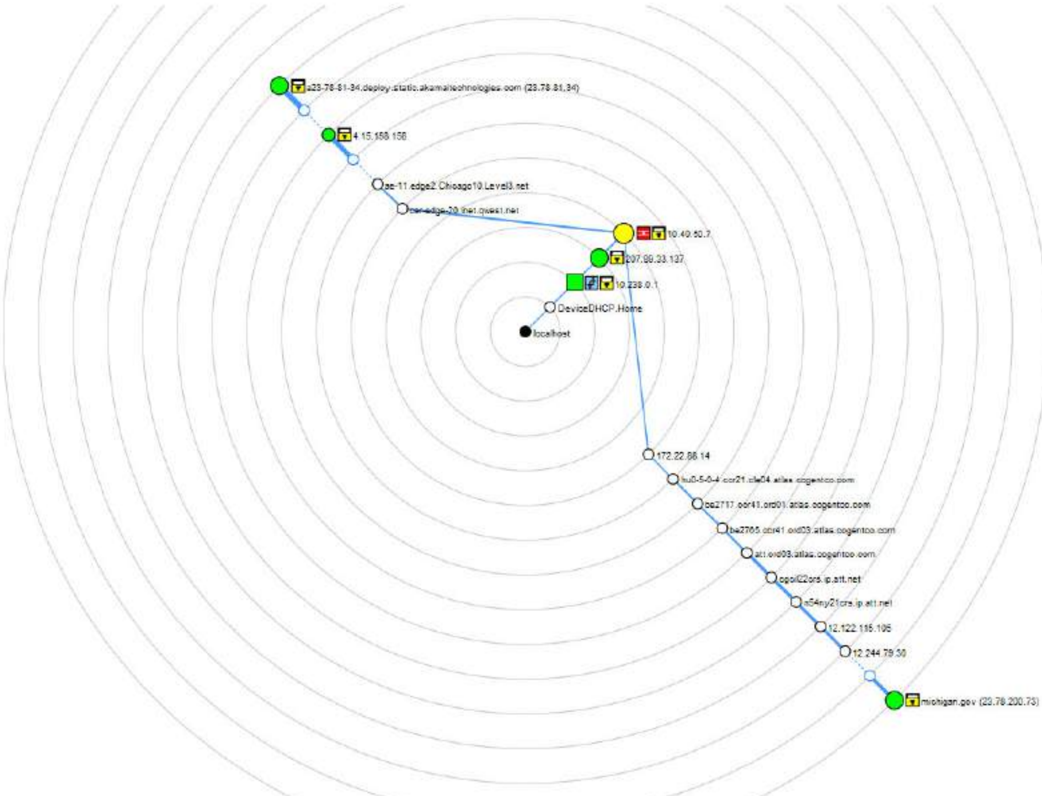
Longitude	-77.1285 / 77°7'42" W
Timezone	America/New_York
Local Time	Thu, 12 Jul 2018 19:27:40 -0400

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.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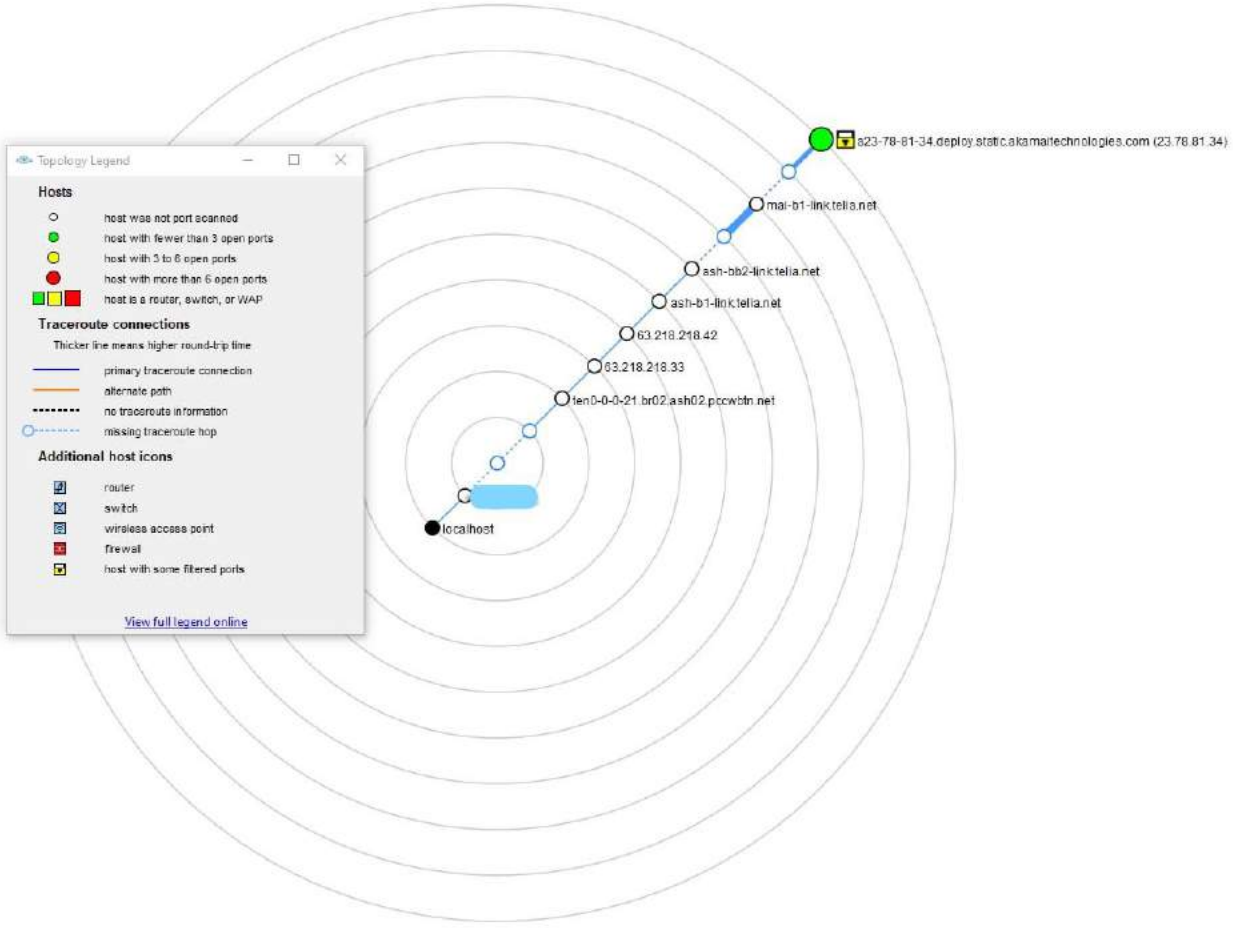
michigan.gov (23.78.200.73)

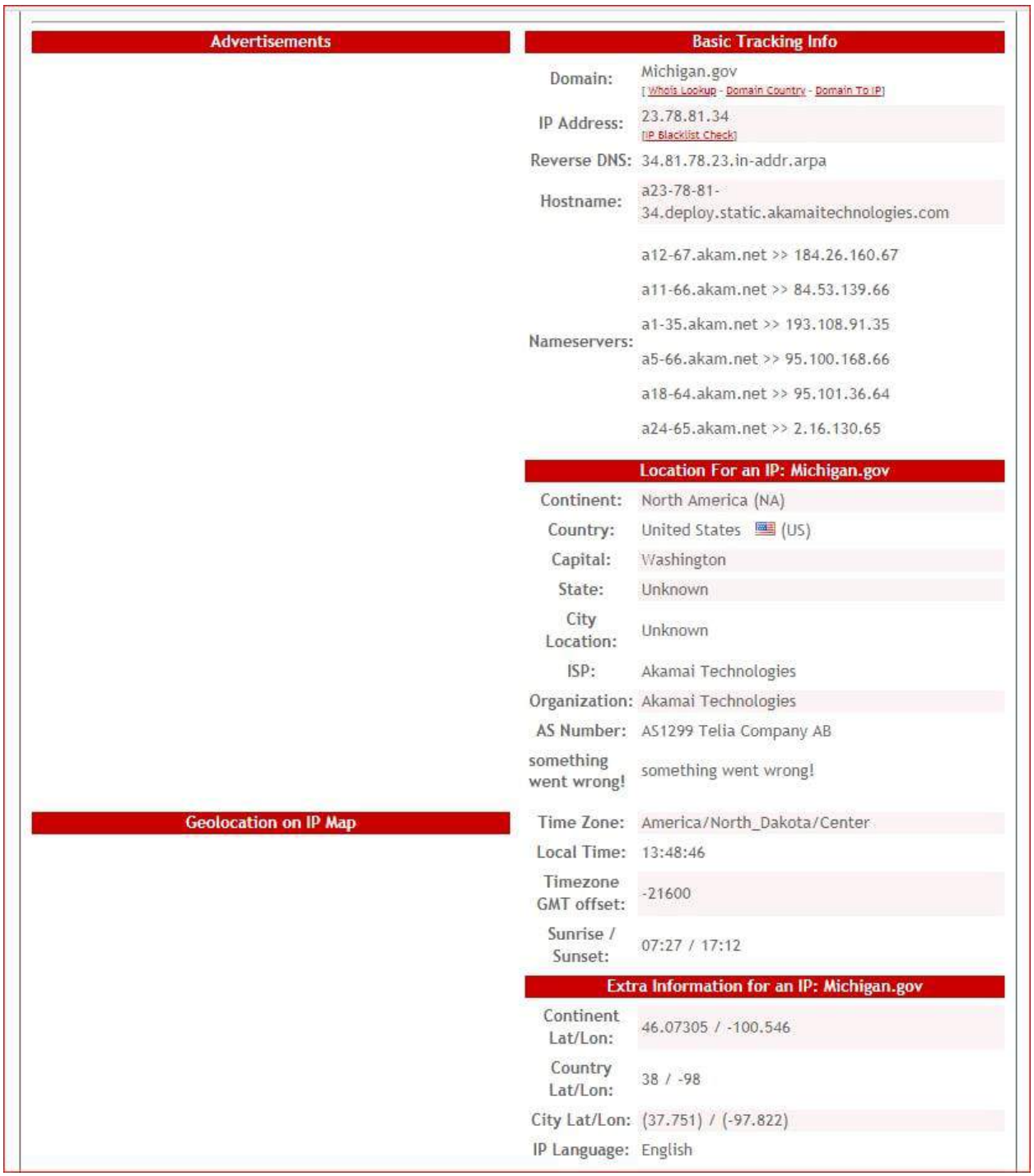
29.



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.



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	Reverse DNS:	34.81.78.23.in-addr.arpa
	Hostname:	a23-78-81-34.deploy.static.akamaitechnologies.com
	Nameservers:	a12-67.akam.net >> 184.26.160.67 a11-66.akam.net >> 84.53.139.66 a1-35.akam.net >> 193.108.91.35 a5-66.akam.net >> 95.100.168.66 a18-64.akam.net >> 95.101.36.64 a24-65.akam.net >> 2.16.130.65
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	Capital:	Washington
	State:	Unknown
	City Location:	Unknown
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	Organization:	Akamai Technologies
	AS Number:	AS1299 Telia Company AB
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	Country Lat/Lon:	38 / -98
	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 : 1.4.1Software and Firmware The software and firmware employed by Dominion D-Suite 5.5-Aconsists 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 Scytl (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:

$$\mathcal{E}_{pk}(m; r) \times \mathcal{E}_{pk}(M; R) = \mathcal{E}_{pk}(mM; r + R)$$

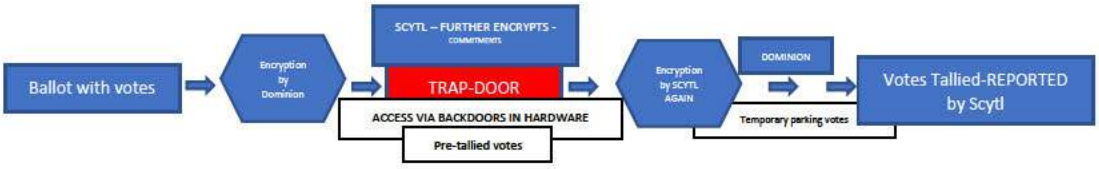
- Re-encryption:

$$\mathcal{E}_{pk}(m; r) \times \mathcal{E}_{pk}(1; R) = \mathcal{E}_{pk}(m; r + R)$$

UCL

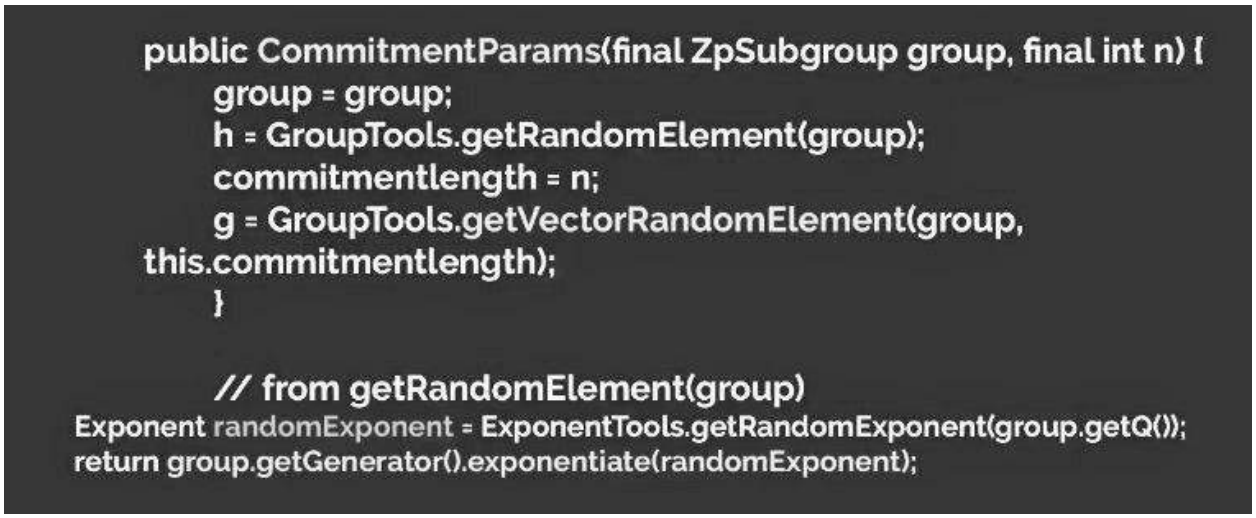
49. When this mixing/shuffling occurs, then one doesn't have the ability to know that vote coming out on the other end is actually their vote; therefore, ZERO integrity of the votes.
50. When the votes are sent to Scytl via Dominion Software EMS (Election Management System) the Trap Door is accessed by Scytl or TRAP DOOR keys (Commitment Parameters).

51.



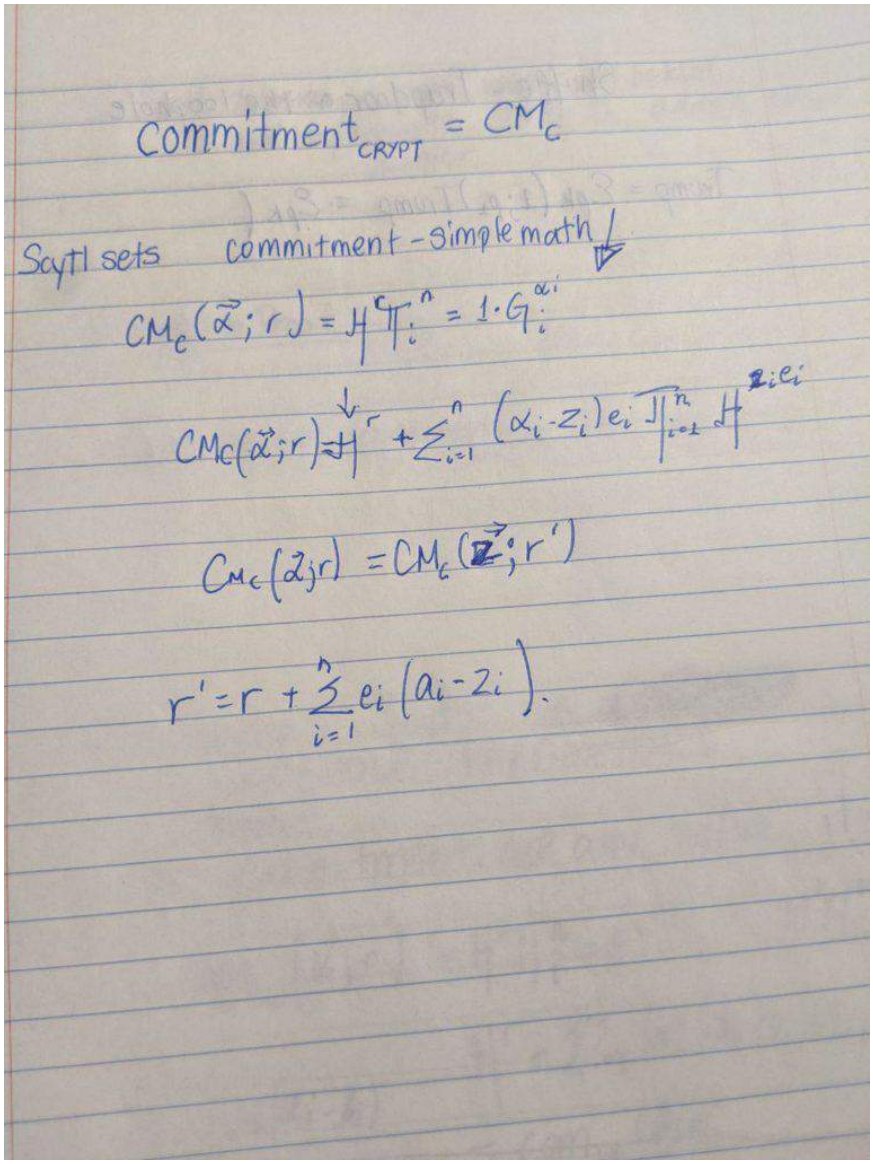
52. The encrypted data is shifted into Scytl's platform in the form of ciphertexts – this means it is encrypted and a key based on commitments is needed to read the data. The ballot data can only be read if the person has a key that is set on commitments.
53. A false sense of security is provided to both parties that votes are not being "REPLACED" during the mixing phase. Basically, Scytl re-encrypts the ballot data that comes in from Dominion (or any other voting software company) as ciphertexts. Scytl 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 Scytl and the Election Software company that agrees to certain

"Generators" and therefore together build "commitments."



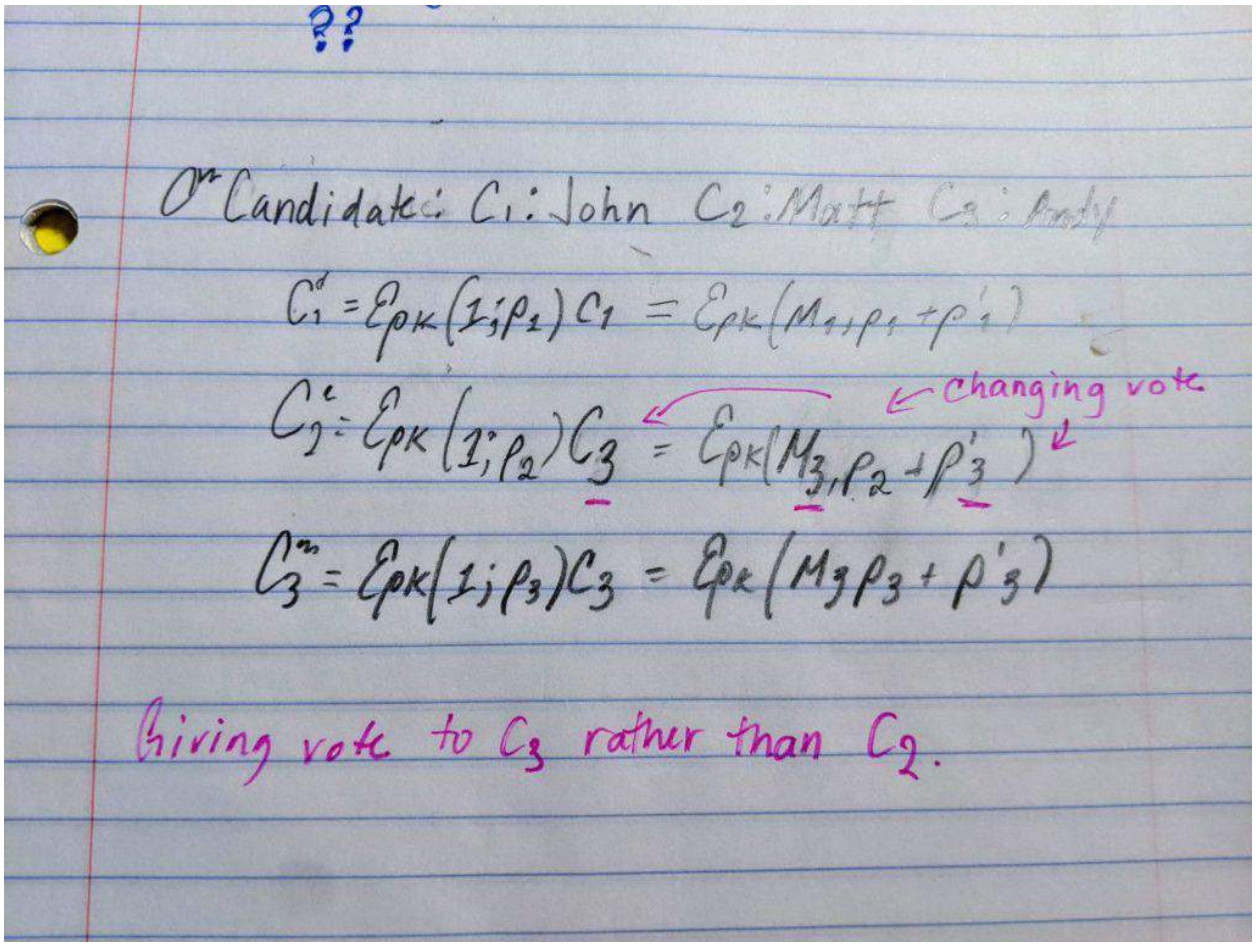
```
public CommitmentParams(final ZpSubgroup group, final int n) {
        group = group;
        h = GroupTools.getRandomElement(group);
        commitmentlength = n;
        g = GroupTools.getVectorRandomElement(group,
this.commitmentlength);
        }

        // 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)

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

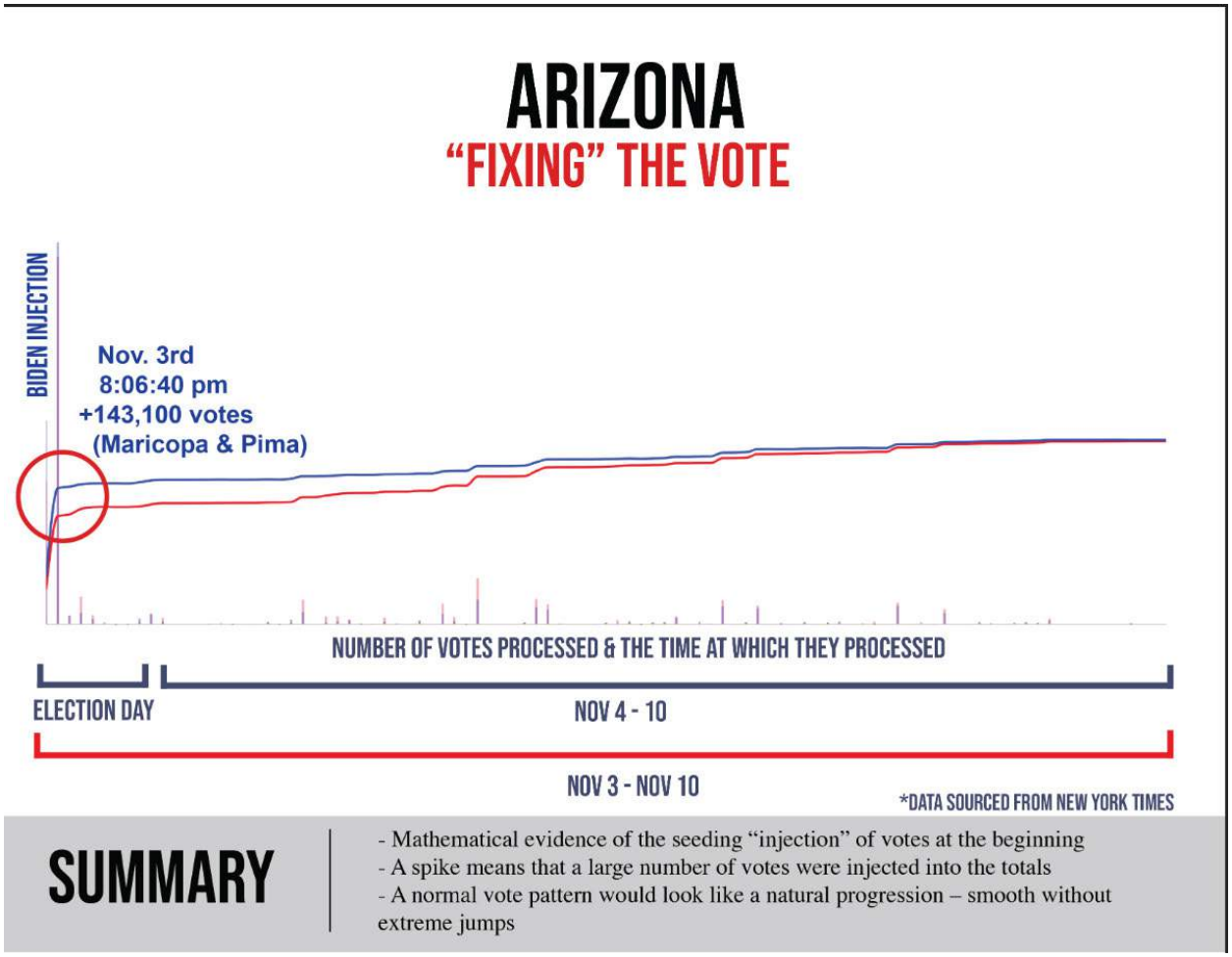
"reallocate" votes via an algorithm to achieve the goal set.



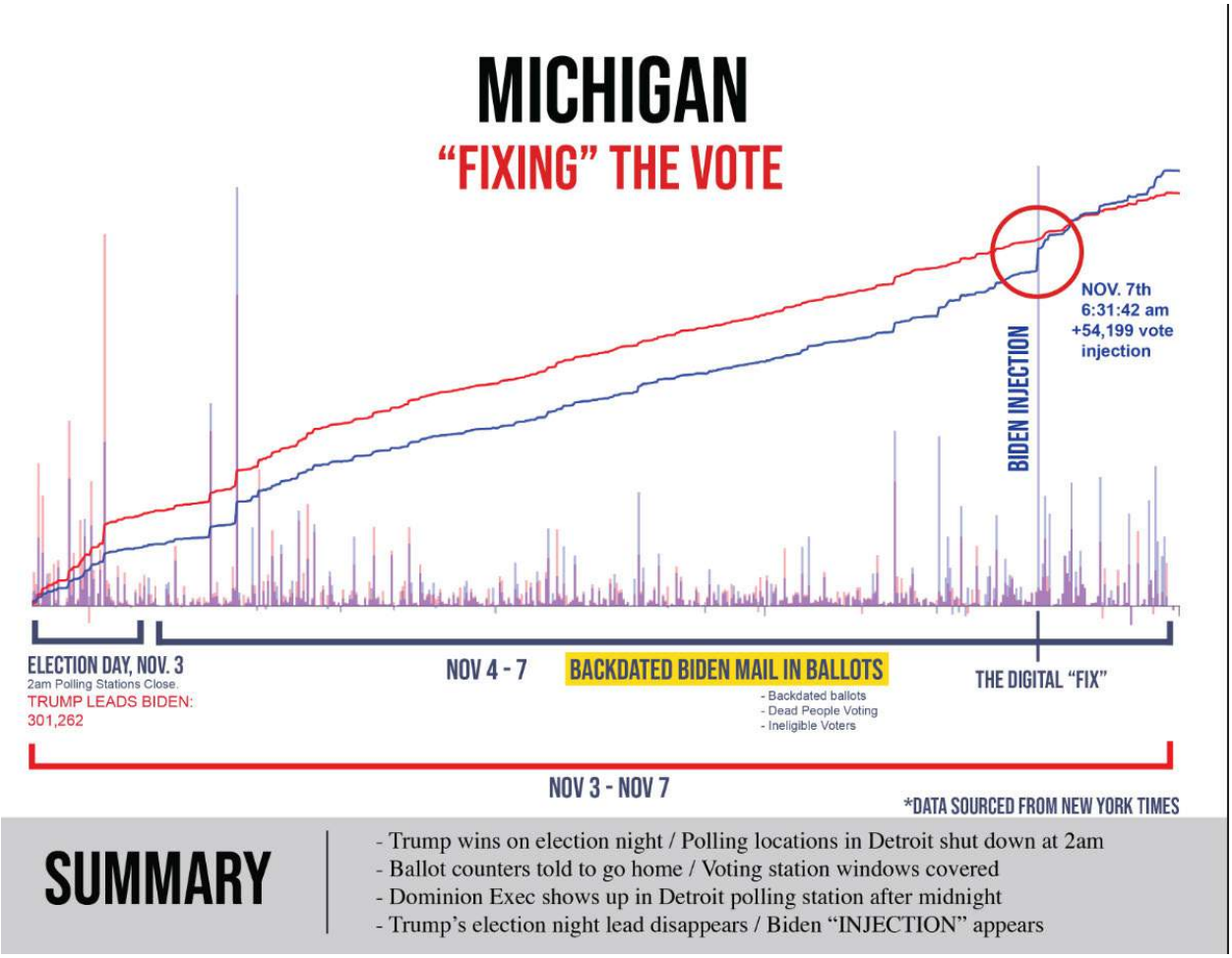
58. STEP 4|Decryption would be the decryption phase and temporary parking of vote tallies before reporting. In this final phase before public release the tallies are released from encrypted format into plain text. As previously explained, those that know the trapdoor can easily change any votes that 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 to 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.

69.


ARIZONA
"FIXING" THE VOTE
BIDEN INJECTION
Nov. 3rd
8:06:40 pm
+143,100 votes
(Maricopa & Pima)
NUMBER OF VOTES PROCESSED & THE TIME AT WHICH THEY PROCESSED
ELECTION DAY
NOV 4 - 10
NOV 3 - NOV 10
*DATA SOURCED FROM NEW YORK TIMES
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

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 :

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

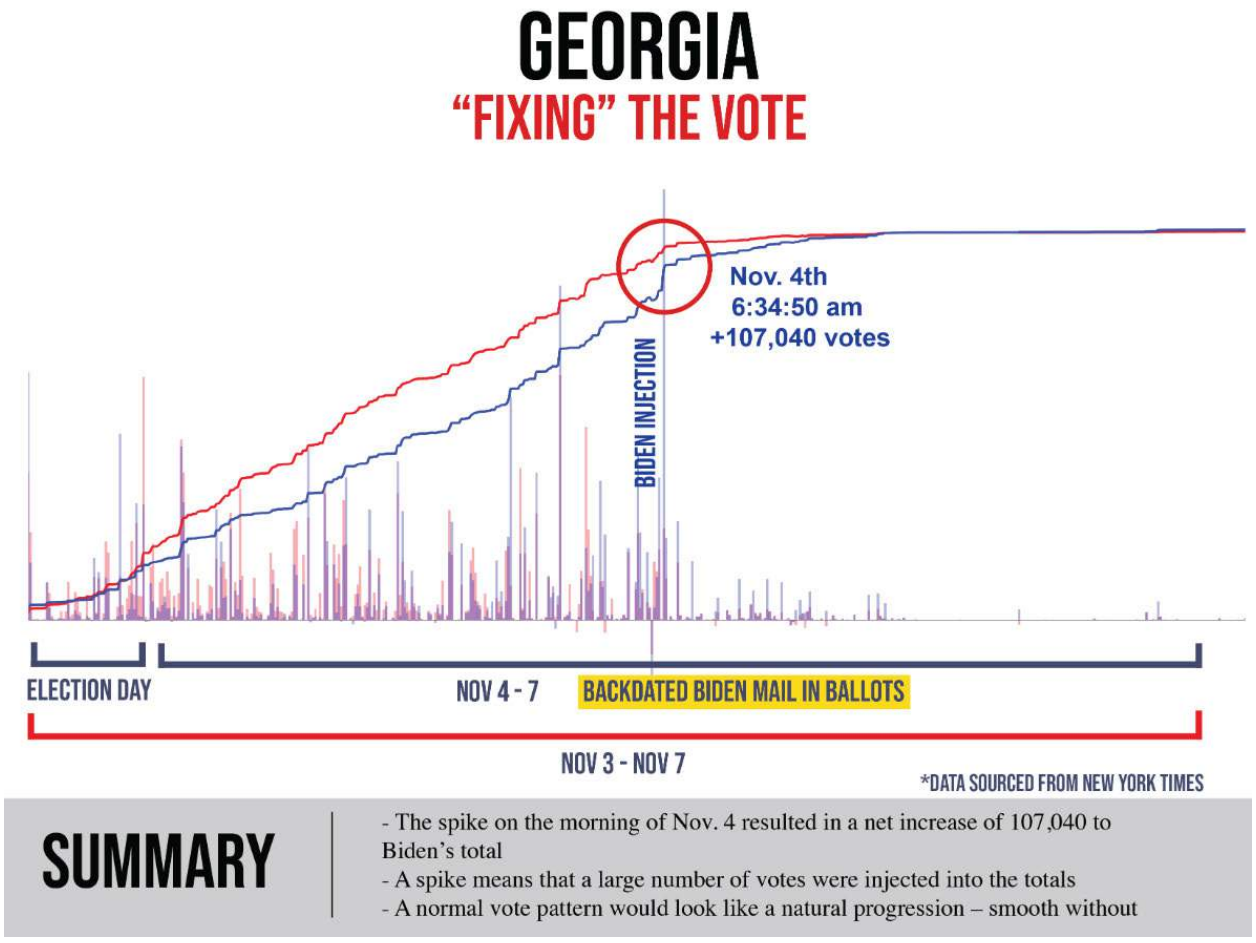
72.

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.

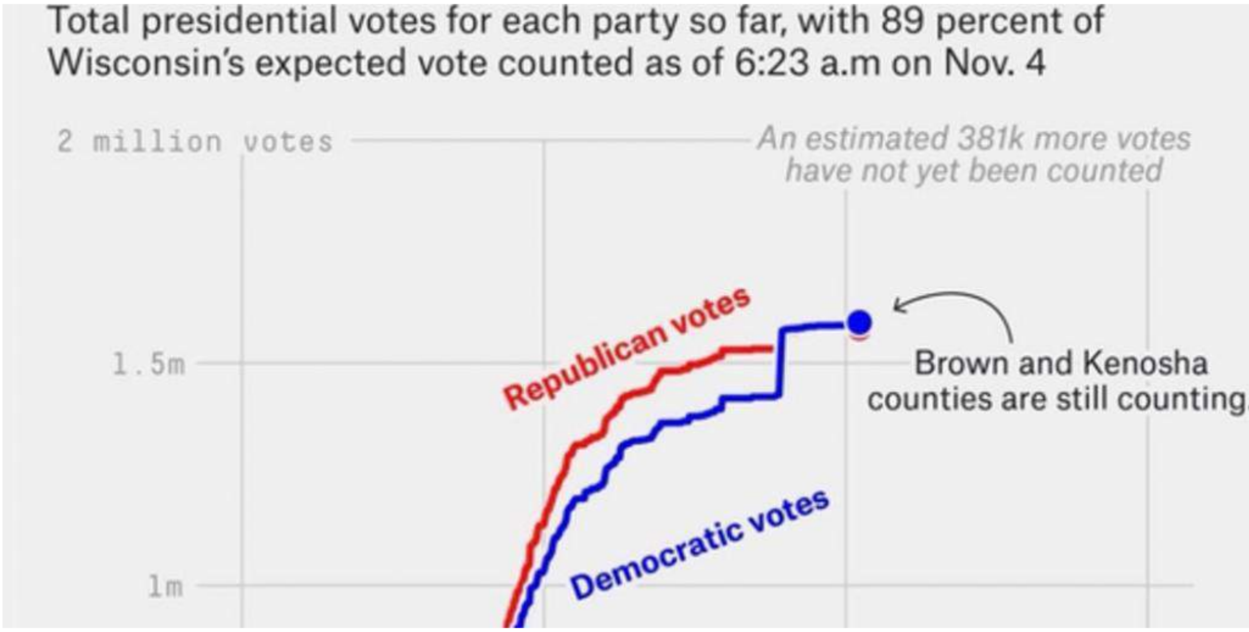


78.

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)

83.

F	G	H	V	W	X	Y	AB	AC	AD	AG	AH	AI	AJ	AK	AL
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	Online										
Active	Registered	Regular	Brown County	11/02/2020	Received In Persor	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		
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	Regular	Brown County	11/02/2020	Online										
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										
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Active	Registered	Regular	Brown County	11/04/2020	Online										
Active	Registered	Regular	Brown County	11/04/2020	Online										

84.

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
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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	11/05/2020	Online
Active	Registered	Regular	Brown County	11/05/2020	Online
Active	Registered	Regular	Brown County	11/05/2020	Online
Active	Registered	Regular	Brown County	11/05/2020	Online
Active	Registered	Regular	Brown County	11/05/2020	Online
Active	Registered	Regular	Brown County	11/05/2020	Online
Active	Registered	Regular	Brown County	11/05/2020	Online
Active	Registered	Regular	Brown County	11/05/2020	Online
Active	Registered	Regular	Brown County	11/05/2020	Online
Active	Registered	Regular	Brown County	11/06/2020	Online
Active	Registered	Regular	Brown County	11/06/2020	Online

85. I can personally attest that in 2013 discussions by the Obama / Biden administration were being had with various agencies in the deployment of such election software to be deployed in ----- in 2013.
86. On or about April 2013 a one year plan was set to fund and usher elections in -----.
87. Joe Biden was designated by Barack Hussein Obama to ensure the ----- accepted assistance.
88. John Owen Brennan and James (Jim) Clapper were responsible for the ushering of the intelligence surrounding the elections in -----.
89. Under the guise of Crisis support the US Federal Tax Payers funded the deployment of the election software and machines in ------ signing on with Scytl.

The White House

Office of the Press Secretary

For Immediate Release — April 21, 2014

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FACT SHEET: U.S. Crisis Support Package for Ukraine

President Obama and Vice President Biden have made U.S. support for Ukraine an urgent priority as the Ukrainian government works to establish security and stability, pursue democratic elections and constitutional reform, revive its economy, and ensure government institutions are transparent and accountable to the Ukrainian people. Ukraine embarks on this reform path in the face of severe challenges to its sovereignty and territorial integrity, which we are working to address together with Ukraine and our partners in the international community. The United States is committed to ensuring that Ukrainians alone are able to determine their country's future without intimidation or coercion from outside forces. To support Ukraine, we are today announcing a new package of assistance totaling **$50 million** to help Ukraine pursue political and economic reform and strengthen the partnership between the United States and Ukraine.

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 in 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.

United States Department of Commerce
National Institute of Standards and Technology

NVLAP®

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

DEPARTMENT OF COMMERCE · UNITED STATES OF AMERICA

For the National Voluntary Laboratory Accreditation Program

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 RiData: CFC-14A RDF8G-233XMCB2-1 RDF16G-233XMCB2-1 RDF32G-233XMCB2-1 SanDisk Extreme: SDCFX-016G SDCFX-032G SanDisk: 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.

114. 

United States Department of Commerce
National Institute of Standards and Technology

NVLAP®

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 Communique dated January 2009).

2020-10-07 through 2020-12-31
Effective Dates

For the National Voluntary Laboratory Accreditation Program

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.

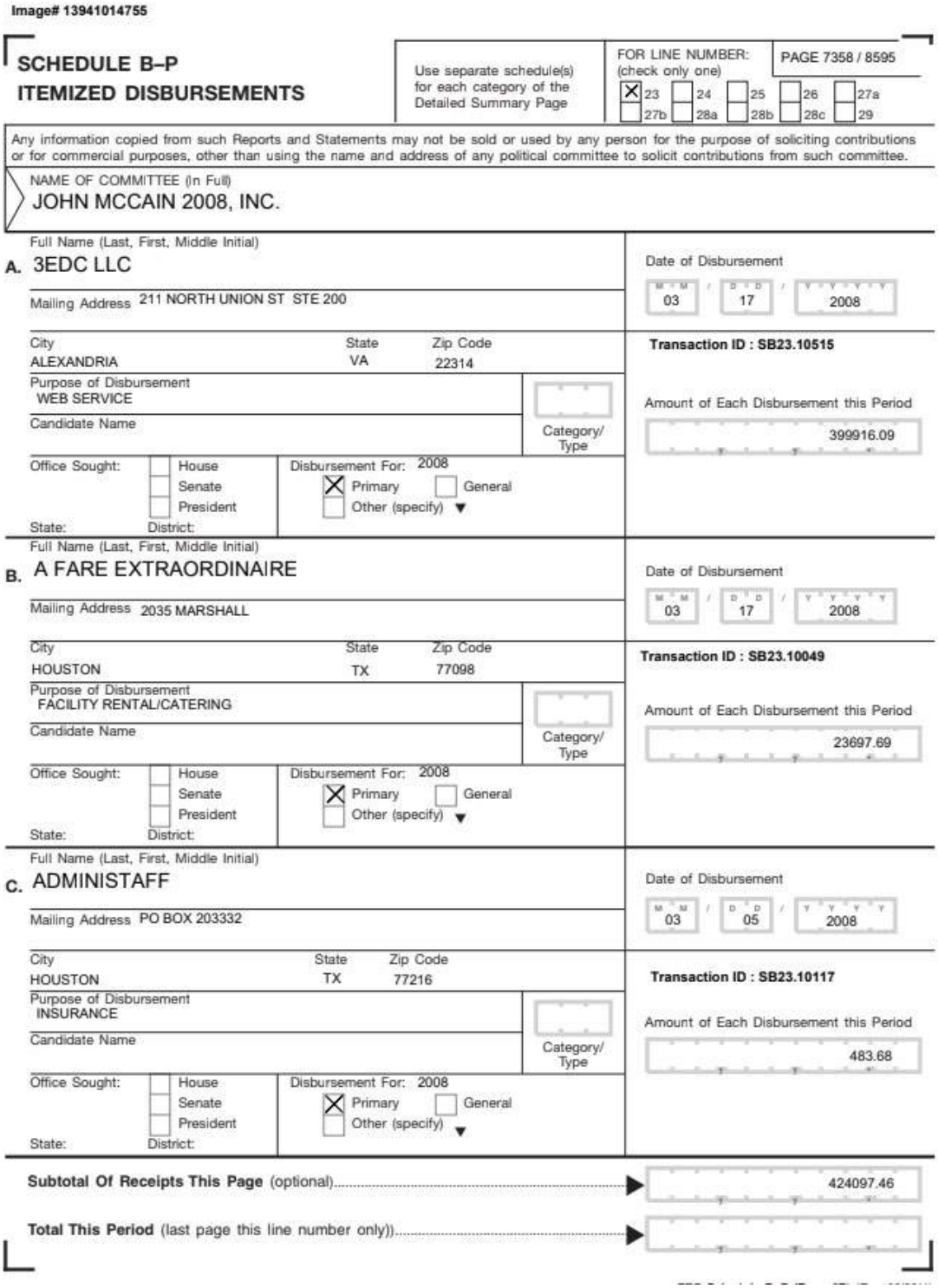
117. GEMS was manifested from SOE software purchased by SCYTL developers and US Federally Funded persons to develop it.

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.



Image# 13941014755

SCHEDULE B–P
ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
☒ 23 ☐ 24 ☐ 25 ☐ 26 ☐ 27a
☐ 27b ☐ 28a ☐ 28b ☐ 28c ☐ 29

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NAME OF COMMITTEE (In Full)
JOHN MCCAIN 2008, INC.

A. Full Name (Last, First, Middle Initial)
3EDC LLC
Mailing Address 211 NORTH UNION ST STE 200
City ALEXANDRIA State VA Zip Code 22314
Purpose of Disbursement: WEB SERVICE
Candidate Name
Category/ Type
Office Sought: ☐ House ☐ Senate ☐ President
State: District:
Disbursement For: 2008 ☒ Primary ☐ General ☐ Other (specify)
Date of Disbursement: 03 / 17 / 2008
Transaction ID : SB23.10515
Amount of Each Disbursement this Period: 399916.09

B. Full Name (Last, First, Middle Initial)
A FARE EXTRAORDINAIRE
Mailing Address 2035 MARSHALL
City HOUSTON State TX Zip Code 77098
Purpose of Disbursement: FACILITY RENTAL/CATERING
Candidate Name
Category/ Type
Office Sought: ☐ House ☐ Senate ☐ President
State: District:
Disbursement For: 2008 ☒ Primary ☐ General ☐ Other (specify)
Date of Disbursement: 03 / 17 / 2008
Transaction ID : SB23.10049
Amount of Each Disbursement this Period: 23697.69

C. Full Name (Last, First, Middle Initial)
ADMINISTAFF
Mailing Address PO BOX 203332
City HOUSTON State TX Zip Code 77216
Purpose of Disbursement: INSURANCE
Candidate Name
Category/ Type
Office Sought: ☐ House ☐ Senate ☐ President
State: District:
Disbursement For: 2008 ☒ Primary ☐ General ☐ Other (specify)
Date of Disbursement: 03 / 05 / 2008
Transaction ID : SB23.10117
Amount of Each Disbursement this Period: 483.68

Subtotal Of Receipts This Page (optional) ▶ 424097.46

Total This Period (last page this line number only)) ▶

122.

123.

124. AKAMAI Technologies services SCYTL.

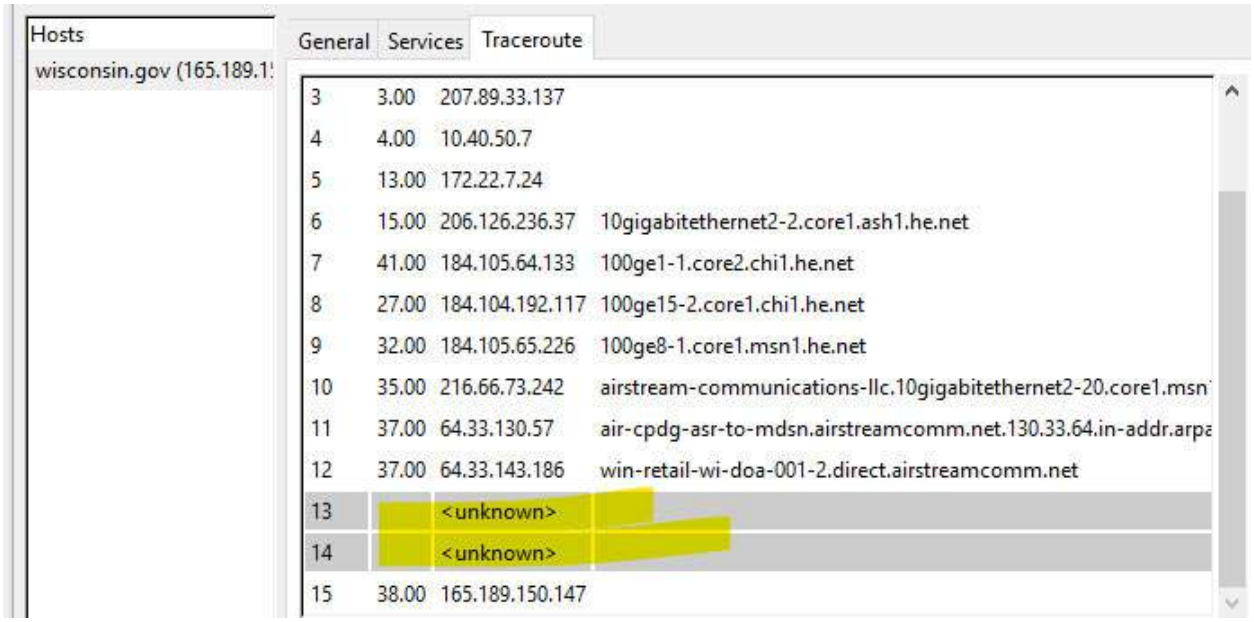
125. AKAMAI Technologies Houses ALL foreign government sites. (Please see White Paper by Akamai.)

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.

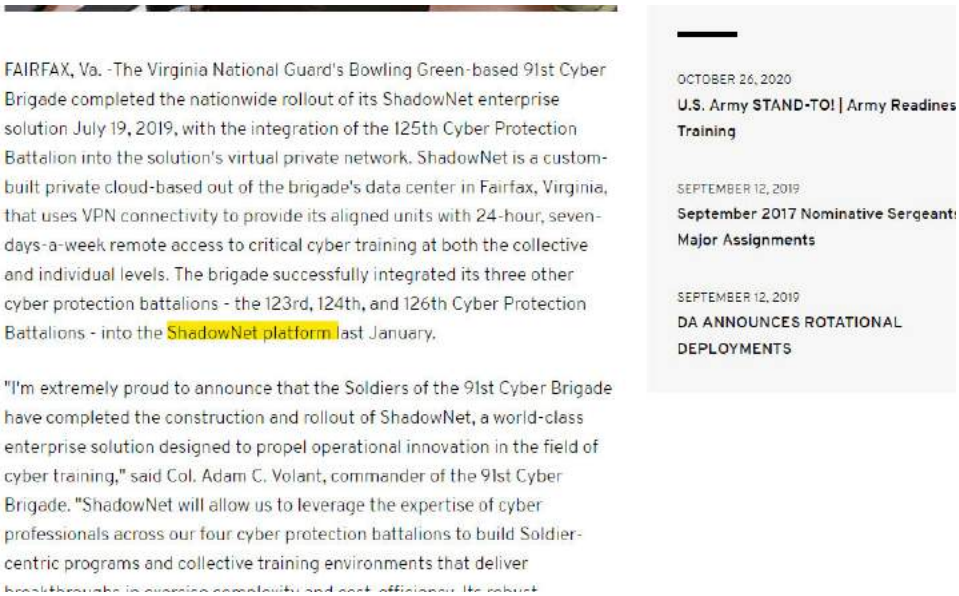
150. For the people of the United States to have confidence in their elections our cybersecurity standards should not be in the hands of foreign nations.

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 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

OCTOBER 26, 2020
U.S. Army STAND-TO! | Army Readines 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	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	

155.

I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge.
Executed this November 29th, 2020.

Exhibit M

RE: [EXTERNAL] Re: Elections Info FOIA Request

[redacted]

Date Monday, August 1st, 2022 at 12:04 PM

Good Afternoon,

At this time, we estimate it will take at least 10 hours to fulfill your request. Based on the lowest level employee able to conduct the review, we estimate the cost to be at least $500.

Due to the estimated cost, we would require a payment of $250.00 to begin processing the request.

Please let me know if you would like to proceed.

Sincerely,

[redacted]

From: [redacted]
Sent: Friday, July 29, 2022 5:18 PM
To: Pate, Paul <Paul.Pate@sos.iowa.gov>; Iowa Secretary of State Paul D. Pate <SOS@sos.iowa.gov>
Subject: [EXTERNAL] Re: Elections Info FOIA Request

[redacted]

****Secretary of State Notice****

This email is from an external source. Think before you click links or open attachments. If you believe this email is phishing, please email this as an attachment to the SOS Help Desk.

July 29, 2022

Dear Iowa Secretary of State Paul D. Pate:

I am still awaiting a response on my last request.

Iowa Code § 22.8(4)(d) - "To determine whether a confidential record should be available for inspection and copying to the person requesting the right to do so. A reasonable delay for this purpose shall not exceed twenty calendar days and ordinarily should not exceed ten business days."

[redacted]

Thank you for your time and your prompt attention to this matter.

Respectfully,

[redacted]

Exhibit M

------- Original Message -------
On Tuesday, July 12th, 2022 at 8:57 AM, [redacted]

July 12, 2022

Dear Iowa Secretary of State Paul D. Pate:

As a citizen of the Great State of Iowa and under the **Iowa Open Records Law § 22.1 et seq.**, I am requesting the following information:

1. Does the State of Iowa use software, hardware, any other products, or services connected to any foreign entity as part of the 2020 election or the upcoming election?

This includes any/all activities from start to finish (i.e., voter verification methods/signature comparisons, ballot scanning equipment, ballot processing software, modem downloads/access, internet connectivity, modem tape result tabulation/printing or any other step in the voting & election process.

2. Are there any foreign entity contractual agreements in any process related to the election process, specifically, but not limited to, Scytl Election Technologies S.L.U. (also stylized SCYTL)?

If so, please provide a copy of the contracts and direct me to exactly which points in the election process where foreign countries may be involved (actively or passively) and the specific Iowa State Statute that demonstrates this type of involvement is legal.

3. Have there been changes to the current policies from past elections to the upcoming elections?

The United States Department of Homeland Security ("DHS") held a call with election officials, State Officials and agents to discuss cybersecurity in the, then, upcoming election of August 2016. At this time The Department of Homeland Security offered assistance to any state that wanted help securing its' electronic election infrastructure. DHS sent this to every single state in this great Union. Examples of aid or assistance could include, but are not limited to, the following: fiduciary claims, financial assistance, legal aid, free devices or software, or simply advice from the Department of Homeland Security regarding the election(s)

4. Did Iowa accept help from the Department of Homeland Security for their elections in 2016 or any election held after 2016?

5. Did you, the Secretary of State office of Iowa, accept any help and/or assistance in any sort, way, fashion or methods from the Department of Homeland Security?

Due to time restraints via the statute of limitations for the 2020 elections I request a prompt response. A lack of response will be written down as a "yes/positive" in the legal action that will commence.

Please respond to my email ([redacted]) in a timely fashion. Or send me a letter with the information I have requested to my address:
[redacted]

Thank you for your time and your prompt attention to this matter.

Respectfully,

[redacted]

[redacted]

[redacted]

Exhibit M

[redacted]

[redacted]

Exhibit M

[redacted]