

UDALL|SHUMWAY
COUNSELORS AT LAW SINCE 1965

1138 NORTH ALMA SCHOOL RD., #101
MESA, ARIZONA 85201

Tel.: 480.461.5300 | Fax: 480.833.9392

Michael Kielsky, #021864
mk@udallshumway.com
Attorneys for Plaintiff

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APR - 8 2016



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IN THE SUPERIOR COURT

COUNTY OF MARICOPA, STATE OF ARIZONA

JOHN BRAKEY, an elector,

Plaintiff,

vs.

MICHELE REAGAN, Arizona Secretary of State; APACHE COUNTY BOARD OF SUPERVISORS, a body politic; LENORA FULTON, Apache County Recorder; COCHISE COUNTY BOARD OF SUPERVISORS, a body politic; CHRISTINE RHODES, Cochise County Recorder; COCONINO COUNTY BOARD OF SUPERVISORS, a body politic; PATTY HANSEN, Coconino County Recorder; GILA COUNTY BOARD OF SUPERVISORS, a body politic; SADIE JO BINGHAM, Gila County Recorder; GRAHAM COUNTY BOARD OF SUPERVISORS, a body politic; WENDY JOHN, Graham County Recorder; GREENLEE COUNTY BOARD OF SUPERVISORS, a body politic; BERTA MANUZ, Greenlee County Recorder; LA PAZ COUNTY BOARD OF SUPERVISORS, a body politic; SHELLY BAKER, La Paz County Recorder; MARICOPA COUNTY BOARD OF SUPERVISORS, a body politic; HELEN PURCELL, Maricopa County Recorder; MOHAVE COUNTY BOARD OF SUPERVISORS, a body politic; ROBERT BALLARD, Mohave County Recorder; NAVAJO COUNTY BOARD OF SUPERVISORS, a body politic; LAURA SANCHEZ, Navajo County Recorder; PIMA COUNTY BOARD OF SUPERVISORS, a body politic; F. ANN RODRIGUEZ, Pima County Recorder; PINAL COUNTY BOARD OF SUPERVISORS, a body politic; VIRGINIA ROSS, Pinal County Recorder; SANTA CRUZ COUNTY BOARD OF SUPERVISORS, a body politic; SUZANNE SAINZ, Santa Cruz County Recorder; YAVAPAI COUNTY BOARD OF SUPERVISORS, a body politic; LESLIE HOFFMAN, Yavapai County Recorder; YUMA COUNTY BOARD OF SUPERVISORS, a body politic; ROBYN S. POUQUETTE, Yuma County Recorder,

Defendants.

Case No.

CV 2016-002889

VERIFIED COMPLAINT

CIVIL - ELECTION

1 Plaintiff, JOHN BRAKEY (hereinafter "Plaintiff"), by and through undersigned counsel
2 for his complaint alleges as follows:

3 **PARTIES**

4 1. Plaintiff is a qualified elector, registered to vote in Pima County, Arizona.

5 2. Defendant MICHELE REAGAN, Arizona Secretary of State ("Secretary of State"), is
6 here named solely in her official capacity.

7 3. The Secretary of State is charged by law with the duty of maintaining voter rolls,
8 including Party preference, directing the conduct of elections, and certifying elections
9 results, including the 2016 Presidential Preference Election.

10 4. Upon information and belief, on or about April 4, 2016, the Secretary of State
11 certified the Official Canvass for the 2016 Presidential Preference Election.

12 5. Defendants APACHE COUNTY BOARD OF SUPERVISORS, a body politic;
13 LENORA FULTON, Apache County Recorder; COCHISE COUNTY BOARD OF
14 SUPERVISORS, a body politic; CHRISTINE RHODES, Cochise County Recorder;
15 COCONINO COUNTY BOARD OF SUPERVISORS, a body politic; PATTY HANSEN,
16 Coconino County Recorder; GILA COUNTY BOARD OF SUPERVISORS, a body politic;
17 SADIE JO BINGHAM, Gila County Recorder; GRAHAM COUNTY BOARD OF
18 SUPERVISORS, a body politic; WENDY JOHN, Graham County Recorder; GREENLEE
19 COUNTY BOARD OF SUPERVISORS, a body politic; BERTA MANUZ, Greenlee County
20 Recorder; LA PAZ COUNTY BOARD OF SUPERVISORS, a body politic; SHELLY BAKER,
21 La Paz County Recorder; MARICOPA COUNTY BOARD OF SUPERVISORS, a body
22 politic; HELEN PURCELL, Maricopa County Recorder; MOHAVE COUNTY BOARD OF
23 SUPERVISORS, a body politic; ROBERT BALLARD, Mohave County Recorder; NAVAJO
24 COUNTY BOARD OF SUPERVISORS, a body politic; LAURA SANCHEZ, Navajo County
25 Recorder; PIMA COUNTY BOARD OF SUPERVISORS, a body politic; F. ANN
26 RODRIGUEZ, Pima County Recorder; PINAL COUNTY BOARD OF SUPERVISORS, a
27 body politic; VIRGINIA ROSS, Pinal County Recorder; SANTA CRUZ COUNTY BOARD OF
28 SUPERVISORS, a body politic; SUZANNE SAINZ, Santa Cruz County Recorder; YAVAPAI

1 COUNTY BOARD OF SUPERVISORS, a body politic; LESLIE HOFFMAN, Yavapai County
2 Recorder; YUMA COUNTY BOARD OF SUPERVISORS, a body politic; ROBYN S.
3 POUQUETTE, Yuma County Recorder, (collectively, "County Defendants") are each here
4 named solely in their corporate or official capacity.

5 6. County Defendants are charged by law or by delegation with the duties of
6 maintaining the voter rolls, including Party preference, publishing the election ballots, and
7 conducting elections, in their respective counties, and of certifying elections results,
8 including the 2016 Presidential Preference Election.

9 JURISDICTION & VENUE

10 7. Defendants caused events to occur throughout the State of Arizona, out of which this
11 Complaint arises.

12 8. This Court has jurisdiction of this action under Ariz.Const.Art. 6, § 14, and A.R.S. §§
13 12-123 (A), 12-1801 through 12-1810, and A.R.S. §§ 16-673 through 16-677.

14 9. Venue is proper in this County under A.R.S. §§ 12-401 (7), (15), (16), and 16-672(B).

15 GENERAL ALLEGATIONS

16 10. Upon information and belief, and after due diligence in reviewing the evidence
17 available, Plaintiff reasonably believes and thereupon alleges, that Defendants, or several
18 of them, caused or permitted acts amounting to misconduct on the part of election boards
19 or any members thereof in any of the counties of the state, or on the part of any officer
20 making or participating in a canvass for a state election, under A.R.S. § 16-672 (A)(1),
21 and/or permitting illegal votes, under A.R.S. § 16-672 (A)(4), and/or that by reason of an
22 erroneous count of votes the declared result did not in fact receive the votes certified, under
23 A.R.S. § 16-672 (A)(5).

24 COUNT ONE – MISCONDUCT – A.R.S. § 16-672 (A)(1)

25 11. Upon information and belief, and upon examination of available evidence, Plaintiff
26 reasonably believes and thereupon alleges, that County Defendants, or several of them,
27 improperly handled voter registration requests. See Affidavit of Cathline Rivera, Affidavit of
28 Alisa Wolfe, Affidavit of Tori J. Shea, attached as Exhibits hereto and included herein as if

1 fully set forth.

2 12. Upon information and belief, and upon examination of available evidence, Plaintiff
3 reasonably believes and thereupon alleges, that County Defendants, or several of them,
4 failed to properly affiliate voters with their Party preference, or improperly and without
5 authority changed their Party preference, or improperly permitted unauthorized changes to
6 voters' Party preference. See Affidavit of Diane Post, Affidavit of James March Simpson,
7 Affidavit of Kelly Green, Affidavit of Alisa Wolfe, Affidavit of Cathline Rivera, attached as
8 Exhibits hereto and included herein as if fully set forth.

9 13. Upon information and belief, and upon examination of available evidence, Plaintiff
10 reasonably believes and thereupon alleges, that County Defendants, or several of them,
11 denied voters their suffrage by preventing them from voting. See Affidavit of Diane Post,
12 Affidavit of Alisa Wolfe, attached as Exhibits hereto and included herein as if fully set forth.

13 14. Upon information and belief, and upon examination of available evidence, Plaintiff
14 reasonably believes and thereupon alleges, that County Defendants, or several of them,
15 denied voters their suffrage by not providing a ballot. See Affidavit of Diane Post, Affidavit
16 of Patricia Lindley Shute, attached as Exhibits hereto and included herein as if fully set
17 forth.

18 15. Upon information and belief, and upon examination of available evidence, Plaintiff
19 reasonably believes and thereupon alleges, that County Defendants, or several of them,
20 denied voters their suffrage by providing the wrong ballot. See Affidavit of Diane Post,
21 attached as Exhibits hereto and included herein as if fully set forth.

22 16. Upon information and belief, and upon examination of available evidence, Plaintiff
23 reasonably believes and thereupon alleges, that County Defendants, or several of them,
24 denied voters their suffrage by refusing to or failing to count their provisional ballot. See
25 Affidavit of Diane Post, Affidavit of Alisa Wolfe, Affidavit of Cathline Rivera, Affidavit of
26 Geoffrey Woods, attached as Exhibits hereto and included herein as if fully set forth.

27 17. Upon information and belief, and upon examination of available evidence, Plaintiff
28 reasonably believes and thereupon alleges, that Defendants, or several of them, improperly

1 maintained the electronic election results, which were illegally accessed and altered by
2 unauthorized parties. See Affidavit of John Brakey, Affidavit of James March Simpson,
3 attached as Exhibits hereto and included herein as if fully set forth.

4 18. Upon information and belief, and upon examination of available evidence, Plaintiff
5 reasonably believes and thereupon alleges, that the Maricopa County Defendants, or
6 several of them, committed misconduct, by unreasonably closing or failing to open sufficient
7 polling places, unreasonably delaying thousands of voters, causing many to give up after
8 waiting in line for many hours, creating confusion, and significantly suppressing the votes
9 cast. See Affidavit of Diane Post, Affidavit of John Brakey, Affidavit of James March
10 Simpson, Affidavit of Geoffrey Woods, Affidavit of Richard Charnin, attached as Exhibits
11 hereto and included herein as if fully set forth.

12 19. Upon information and belief, and upon examination of available evidence, Plaintiff
13 reasonably believes and thereupon alleges, that the Secretary of State improperly
14 maintained the voter rolls, which was illegally accessed by unauthorized parties. See
15 Affidavit of James March Simpson, attached as Exhibits hereto and included herein as if
16 fully set forth.

17 COUNT TWO – ILLEGAL VOTES – A.R.S. § 16-672 (A)(4)

18 20. Upon information and belief, and upon examination of available evidence, Plaintiff
19 reasonably believes and thereupon alleges, that County Defendants, or several of them,
20 permitted illegal votes to be cast, counted, or reported. See Affidavit of Diane Post, Affidavit
21 of John Brakey, attached as Exhibits hereto and included herein as if fully set forth.

22 21. Upon information and belief, and upon examination of available evidence, Plaintiff
23 reasonably believes and thereupon alleges, that County Defendants, or several of them,
24 counted votes which were illegally cast, or which were not cast at all but were illegal data
25 manipulations of actual vote counts. See Affidavit of John Brakey, Affidavit of James March
26 Simpson, attached as Exhibits hereto and included herein as if fully set forth.

27 COUNT THREE – ERRONEOUS COUNT – A.R.S. § 16-672 (A)(5)

28 22. Upon information and belief, and upon examination of available evidence, Plaintiff

1 reasonably believes and thereupon alleges, that County Defendants, or several of them,
2 erroneously counted or reported votes. See Affidavit of Diane Post, Affidavit of John
3 Brakey, attached as Exhibits hereto and included herein as if fully set forth.

4 23. Upon information and belief, and upon examination of available evidence, Plaintiff
5 reasonably believes and thereupon alleges, that County Defendants, or several of them,
6 erroneously counted votes not legally cast, or which were not cast at all but were data
7 manipulations of actual vote counts. See Affidavit of John Brakey, Affidavit of James March
8 Simpson, attached as Exhibits hereto and included herein as if fully set forth.

9 24. Plaintiff therefore is entitled to judgment ordering the Secretary of State to void her
10 certification of the Official Canvass for the 2016 Presidential Preference Election, and
11 permanently enjoining the Secretary of State and the County Defendants from certifying the
12 2016 Presidential Preference Election until such election is properly conducted and in
13 compliance with every requirement of Arizona law.

14 **PLAINTIFF'S PRAYER FOR RELIEF**

15 WHEREFORE, Plaintiff prays for judgment against Defendants and in favor of
16 Plaintiff on his Complaint, as follows:

17 A. Declaring Defendants permitted or caused acts amounting to election misconduct,
18 under A.R.S. § 16-672 (A)(1), or that Defendants permitted illegal votes to be cast or
19 counted, under A.R.S. § 16-672 (A)(4), or that Defendants certified an erroneous count of
20 votes, under A.R.S. § 16-672 (A)(5), and ordering the Secretary of State to void her
21 certification of the Official Canvass for the 2016 Presidential Preference Election;

22 B. Permanently enjoining the Secretary of State and the County Defendants from
23 certifying the 2016 Presidential Preference Election until such election is properly
24 conducted and in compliance with every requirement of Arizona law;

25 C. For Plaintiff's legal costs against Defendants, pursuant to A.R.S. § 12-348(A)(2) or
26 other statute or rule providing for the recovery of legal costs; and

27 D. Ordering such other relief, including permanent or temporary injunctions, restraining
28 orders, or other orders against Defendants, or some of them, as this Court deems

1 equitable, just, and proper.

2 RESPECTFULLY SUBMITTED this 8th day of April, 2016.

3 BY:

4 
Michael Kielsky
Attorney for Plaintiff

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6
7
8 **VERIFICATION**

9 I, John Brakey, make the following verification pursuant to the requirements of A.R.S.
10 § 12-1803 and/or A.R.S. § 16-673 (B). I have read the foregoing complaint, know the
11 contents thereof, and verify that it is true of my own knowledge, except the matters stated
12 therein on information and belief, and that as to those matters, I believe the complaint to be
13 true.

14 Pursuant to Rule 80(i), Arizona Rules of Civil Procedure, I declare under penalty of
15 perjury that the foregoing is true and correct.

16 Executed on April 8, 2016.

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19 _____
20 John Brakey
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EXHIBITS

AFFIDAVIT

I, John R. Brakey, hereby declare:

1. My date of birth is April 21, 1954.

2. I am a resident of Pima County, Tucson, AZ 85706.

3. I am well-acquainted with Electronic Voting, Vote by Mail and elections in Arizona since 2004. Shortly after the election of November 2004 I and others formed a group called AUDIT-AZ, which is an acronym for Americans United for Democracy, Integrity and Transparency in Elections. What we've learned since 2004 is simple: elections must be transparent and verifiable. Anything less is unacceptable.

4. Our voting system was developed around a failed concept known as "Security by Obscurity." The idea is that security is inherent in the use of secrecy in the design or implementation of the system. Yet everyone in the election industry knows hacking is as easy as opening the database in the common program called Microsoft Access. One can even use this Access program to delete or change entries in Diebold's GEMS audit log without detection. See Ibeta report.¹ http://www.sweetremedy.tv/media/iBeta_report.pdf "Security by Obscurity" ultimately became the handy rationale for skirting transparency. Most of the public is unaware that our elections are vulnerable to illegal manipulation by vendors and programmers, as well as memory card viruses and other security breaches.

5. In 2006 Jim March and I found Microsoft office on the central tabulator computer of the Maricopa County Election Department which is not permitted by Arizona Law to be on the system. We also sued Maricopa and prevailed in 2010 when they severely undermined election security in numerous illegal means. See court filing: <http://media.phoenixnewtimes.com/5229904.0.pdf>

6. On March ²²~~16~~, 2016 I closely watched the election results and downloaded results as they were posted online. My subsequent analysis found an anomaly between the Vote-By-Mail ballots and the votes cast on election day. Why would one candidate win the VBM by 60% and the other candidate win the vote on election day by about 60%? And then go on to win the Provisionals by 63%? Given the irregularities in this election, this merits investigation.

7. Vote-by-Mail (VBM) ballots can be gamed with impunity. VBM ballots are not sorted by precinct except inside the central tabulator. The tabulator is hackable: it could easily be pre-programmed to alter ballot batches only over a certain size, thus avoiding the random testing done by audit batches pulled for hand counting. This is similar to the recent Volkswagen Diesel engine case, where software was programmed to behave one way under testing conditions and a different way during normal vehicle use.

8. According to our long-time attorney Bill Risner: "Every study of the security of computer voting systems has identified insiders such as company employees and/or vendors and election department employees as the primary security risks and these same vendors when having their software certified instructed the test labs NOT to check the software for security." Las Vegas slot machines have far better security.

9. A.R.S. § 16-602(1) states: "The unofficial vote totals from all precincts shall be made public before selecting the precincts to be hand counted." In this election, Pima County Elections did not publicly commit the total results prior to performing the hand-count audits, a clear violation of the law. I understand that this still goes on in Maricopa even though I previously sued Maricopa county for the same practice and prevailed in 2010.

10. In the November 2015 election, the Pima County Elections Department was caught trying to manipulate another Bond Election during the count of VBM ballots. I personally observed the Logic and Accuracy (L&A) Testing at the Pima County Elections Division. When the test was completed, seals were placed prominently on the vulnerable parts of the system. I left the Elections office and returned home. A couple of hours later, I hit the hot link to the Election Department's Live Feed. I watched as an employee at the Pima County Elections Division broke into a sealed part of the central tabulator and hooked up an ethernet connection.

<http://fatallyflawedelections.blogspot.com/2015/10/john-brakey-on-wake-up-tucson-pima.html>

11. Pima County Elections Director Brad Nelson lied to the press, candidates and party observers about last fall's computer breach, claiming that an errant employee committed the breach in order to complete the L&A test, but that test had been completed that morning, as documented by our video evidence.

12. Physically sorting early ballots by precinct prior to the customary hand count audit is an important safeguard against ballot stuffing, and also makes it easier to detect fraud or other anomalies. Following the majority opinion of the Pima County Election Integrity Commission in 2012 supporting this practice, the Secretary of State implemented presorting statewide. However, Pima County circumvented its own Election Integrity Commission and obtained a waiver from the Secretary of State's office allowing the county to forego this safeguard. A videotape of this meeting is available.

13. Pima County Elections Director Brad Nelson, an employee of Pima County Administrator Chuck Huckelberry, actively lobbied the state senate in 2006 to adjust the hand count audit law to a less statistically meaningful percentage of 1%. He didn't request to eliminate the hand count audit law but to simply diminish the law's effectiveness. These changes became law.

14. Vote-By-Mail Ballots (often referred to as early voting) in Arizona are typically about 75% of the overall vote share. This type of voting is difficult to monitor, making it vulnerable to ballot harvesting or ballot stuffing. An excellent summary of this problem was provided by Jim March and Jill Simpson in a 2012 in an article entitled, "[Karl Rove's Electronic Empire of Fraud](http://fatallyflawedelections.blogspot.com/2012/10/karl-roves-electronic-empire-of-fraud.html)".

<http://fatallyflawedelections.blogspot.com/2012/10/karl-roves-electronic-empire-of-fraud.html>

15. The anomaly between Clinton winning the VBM by 60% and Sanders winning the Election day vote cast at the polls by 60% is unusual. As stated above, given the irregularities in this election, this merits investigation.

Maricopa County										
Counts are still going on as of 3.27.16										
	HRC	HRC %	Sanders	Sanders %	Other Candidates	Other %	Total	REG DEMS	% Turn out	
EV =VBM	127,397	59.72%	81,218	38.07%	4,722	2.21%	213,337	507,826	42.01%	
POLLS	12,802	38.85%	19,883	60.34%	264	0.80%	32,949	507,826	6.49%	
PROV										
TOTALS	140,199	56.93%	101,101	41.05%	4,986	2.02%	246,286	507,826	48.50%	

16. Through litigation against Santa Cruz county we learned that election database programming (setting up the "structure" of the election data such as the candidates, precincts and the like) is the province of **small elite private programmers and/or corporations** who work in the shadows, beyond the reach of public records. Alterations to the results are very possible by mis-programming the databases and by the vendor's apparent continued access to the data for "troubleshooting", especially if the wrong candidate winning is considered "trouble". In that case we filed a public records request only to be denied and told in court that there were no records to give because the Santa Cruz Clerk does their own programming of the central tabulator. After getting the database's audit logs we found that Melinda Meek was lying to the court and the public. We discovered that William E. Doyle was programming the system for Santa Cruz county and many of the counties in the state. We further discovered that he was performing all this work as a subcontractor (IRS form1099). From what we can see, at one time he was programming 12 out of the 15 counties in Arizona. Doyle was illegally loading the databases through phone modems that also receive the election results on election night. Link: Santa Cruz EIC vs SCBOS Part 9 Testimony of Defendant, Melinda Meek, Clerk Election Director 9.24.14: <https://youtu.be/Tx80l2WPZoc> Link to story: [William E. Doyle, the Hidden De Facto Statewide Election Director: http://fatallyflawedelections.blogspot.com/2015/03/william-e-doyle-hidden-de-facto.html](http://fatallyflawedelections.blogspot.com/2015/03/william-e-doyle-hidden-de-facto.html)

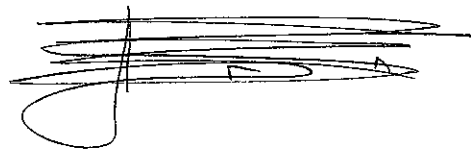
17. In closing, elections are not any good unless they are verifiable. In the wake of the 2000 Presidential Election debacle, the U.S. Congress passed the Help America Vote Act (HAVA) and created the Federal Election Assistance Commission. The first Chairman of the FEC was the Rev. De Forest Soaries, appointed by George W. Bush in 2003. In April of 2005, Rev. Soaries resigned from the commission and explained that he believed he was "deceived" by both the White House and Congress, and that neither was ever "really serious about election reform." Rev. Soaries excoriated both Congress and the White House, referring to their dedication to reforming American election issues as "a charade," and "a travesty," and said that the system now in place is "ripe for stealing elections and for fraud." Additionally, he said; "We know more today about how to build a machine to take pictures of rocks on Mars than we know about how to build a machine to safeguard the American right to vote."ⁱⁱ

Based upon reasonable inquiry, I believe this Affidavit is well grounded in fact. The statements and matters alleged herein are within my personal knowledge, and true and correct to the best of my knowledge and belief, except as to those allegations stated upon information and belief, and, as to those allegations, I believe them to be true.

Pursuant to Rule 80(i), Arizona Rules of Civil Procedure, I declare under penalty of perjury that the foregoing is true and correct.

Date: 4/7/2016

John R Brakey



ⁱ Access program to delete or change entries in the Diebold's GEMS audit log without being detected. See Ibeta report http://www.sweetremedy.tv/media/Ibeta_report.pdf

ⁱⁱ Read what else Rev. DeForest Soaries has to say: <http://www.bradblog.com/?p=3491#comments>

<https://www.freedomsphoenix.com/Uploads/001/Media/Maricopa-County-Elections-Report.pdf>

AFFIDAVIT

I, Richard Charnin, hereby declare as follows:

1. My date of birth is 12/29/1942
2. I am a resident of Delray Beach, FL.
3. I am well acquainted with John Brakey who is with American United for Democracy, Integrity and Transparency in Elections (AUDIT-AZ).
4. On March 28, 2016, I was presented a spreadsheet of election results for all 15 Arizona counties.
5. This document compares Maricopa voter turnout to the other 14 AZ counties as well as to the 2008 presidential primary. The spreadsheet is from John Brakey, the foremost forensic election fraud expert in AZ. The data is from the Arizona Secretary of State:

<http://apps.azsos.gov/election/2016/PPE/Results/PPE2016Results.htm#>
6. Of the 15 AZ counties, Maricopa (Phoenix) is by far the largest county with nearly 60% of the state's registered voters. Pima County (Tucson) is second with 16%.
7. In the 2008 Presidential primary, Maricopa voter turnout was 54.3%. In the other 14 counties, there was a 47.2% turnout. In 2016, 13 counties had higher voter turnout rates than in 2008.
8. *The 4.1% decline (17,000 votes) in Maricopa 2016 turnout (50.2%) from 2008 is counterintuitive. Voter turnout in the other 14 AZ counties increased by an average of 8.27%.*
9. *Based on the overall trend, Maricopa had a projected turnout of approximately 62.6%. The discrepancy in voter turnout is a powerful indicator of voter suppression. The probability of the 12.4% difference (153,000 votes) between Maricopa's projected voter turnout and the official 50.2% turnout is approximately 6.2E-12 or 1 in 6 trillion.*
10. *The probability of the 5.26% difference in voter turnout between 14 AZ counties (55.48%) and Maricopa (50.22%) is approximately 0.03% (1 in 3000).*
11. I used this information to develop statistical analysis in my blog.
12. I clearly remember that I did this. All of my blog posts are stored.
13. Based upon reasonable inquiry, I believe this Affidavit is well grounded in fact. The statements and matters alleged herein are within my personal knowledge, and true and correct to the best of my knowledge

and belief, except as to those allegations stated upon information and belief, and, as to those allegations, I believe them to be true.

14. Pursuant to Rule 80(i), Arizona Rules of Civil Procedure, I declare under penalty of perjury that the foregoing is true and correct.

Date: April 7, 2016 Richard Charnin

[name]

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County	2016 Registration	Votes	2016 Turnout	2008 Turnout	Change
Maricopa	1,238,508	621,976	50.2%	54.3%	-4.1%
Pima	327,699	202,934	61.9%	52.4%	9.5%
Yavapai	82,057	56,454	68.8%	51.6%	17.2%
Pinal	98,112	52,221	53.2%	46.1%	7.1%
Mohave	65,409	33,552	51.3%	43.2%	8.1%
Cochise	45,952	24,310	52.9%	43.5%	9.4%
Coconino	45,385	21,580	52.9%	49.3%	3.6%
Yuma	43,937	20,105	45.8%	39.3%	6.4%
Navajo	42,254	18,066	42.8%	37.3%	5.5%
Gila	20,503	11,698	57.1%	50.9%	6.1%
Apache	34,635	11,360	32.8%	28.1%	4.7%
Santa Cruz	15,707	6,098	38.8%	33.8%	5.0%
Graham	13,073	5,966	45.6%	38.3%	7.4%
La Paz	5,592	2,004	35.8%	42.3%	-6.5%
Greenlee	3,131	1,557	49.7%	44.1%	5.6%
Total	2,081,954	1,089,881	52.3%	51.3%	1.1%

2016 Voter Turnout	Actual	Expected
Maricopa	1,238,508	1,238,508
Turnout %	50.22%	62.6%
Voter turnout	621,976	775,306
Voter Suppression		153,330

AFFIDAVIT

I, Kelly Green, hereby declare as follows:

1. My date of birth is 2/21/60.
2. I am a resident of Arizona.
3. I am well acquainted with _____, who is _____.
4. On _____, I was present at _____.
5. At that time, I witnessed _____.

6. I clearly remember that my right to vote was taken away due to my voter id being changed from Democrat to PND (party not defined). I had just received my new id a couple days before the I had to vote. I went to vote on Tuesday March 22 at the Lutheran Church on S. Cardinal Ave around 9:00 am and I gave my ID to the person at the desk, he told the lady on his right that my party affiliation was PND and she told me I couldn't vote because it was a closed primary. I told her that I had been a Democrat since Reagan was president. She didn't respond so I left. I called the recorders office around 10:00 when I got to my office. The lady on the other line told me I had changed my voter affiliation to PND when I had my driver's license picture updated a couple weeks earlier. I told her I did not. I called a friend that works there and actually had taken my picture that day and he told me I didn't check the box to change my party affiliation. I went back to my polling place after work and demanded a provisional ballot and the same lady told me it wouldn't count but gave it to me. I filled it out and started to leave and over heard the same lady tell an older Hispanic gentleman that he had changed his party affiliation to PND and he denying it as well and told him to ask for a provisional ballot because wasn't giving him the option either. I then asked her loudly if she was denying us the right to vote? She backed down at that point. A couple days later I received another voter id in the mail and it still said PND. I then received another id on April 4th and it was changed back to Democrat..

7. Based upon reasonable inquiry, I believe this Affidavit is well grounded in fact. The statements and matters alleged herein are within my personal knowledge, and true and correct to the best of my knowledge and belief, except as to those allegations stated upon information and belief, and, as to those allegations, I believe them to be true.

8. Pursuant to Rule 80(i), Arizona Rules of Civil Procedure, I declare under penalty of perjury that the foregoing is true and correct.

Date: 4/07/2016 _____ Kelly Green

[name]



AFFIDAVIT

I, Dianne Post, hereby declare as follows:

1. My date of birth is January 4, 1947.
2. I am a resident of Phoenix, Arizona and of Maricopa County since 1980.
3. I was a clerk, hired by the County of Maricopa, at the Arizona Presidential Preference election on March 22, 2016. I am also a premium poll worker meaning that I have had extra training. I have also been a volunteer working the polls since on or about 1992 and have often been the inspector.
4. On 22 March 2016, I was present from 5:30 a.m. to 8 p.m. at poll location number 7037, Broadway Street and 43rd St, at the University of Arizona Extension. During that time, I worked exclusively on the e-pollbooks checking in voters. We had to log into our computers with our full names so there is a record of who worked what poll book at which location during what hours.
5. During that day, I witnessed the following: In the morning, it occurred that a Democratic voter needed a provisional ballot and when I got to the computer screen that said "scan in provisional ballot number" and then "select ballot", it would not let me select a Democratic ballot.

On the screen, after I scanned in the provisional ballot number, I selected "party" – Dem. Then I went to "ballot style" and all it would list was ballot styles (CD districts) with 1 in front of them indicating they were Republican. The "2" code was Democratic and "3" was Green. If I selected one of the Republican ballot styles, then it cued me to "pick a party" which of course I had already done. But it would not accept the Dem party because the "ballot style" was a Republican one. There was no other "ballot style" to choose from. So the only party that could be chosen was Republican.

The first time it happened, I called Joe Borquez (the inspector) over and he watched me try to get a Dem ballot. I could not. Then we called Frank (another poll worker) over and he watched me try to get a Dem ballot. I could not. So we decided that I would do as the computer required (i.e. chose a Republican ballot) but when the "ticket" printed out from our machines, I wrote on it "was Dem" and gave the person a Dem ballot. The "ticket" is like a grocery store receipt and has the number of the provisional ballot on it and the party. We kept the "ticket" while the voter kept the pink sheet on the front of the provisional ballot paperwork. I figured by writing "was Dem" on it, the auditor could later figure out why the totals of actual ballots did not balance with the totals of ballots counted in the computer – because the computer said "Rep" but I had given a "Dem" which then could be accounted for by the hand written "was Dem" on the "ticket".

The first time it happened, I thought it was just a fluke. The second time I thought, this is not good. The third time, I thought, oh no, I'm keeping track of this. So I started keeping track about 10 a.m. It happened 36 times in the rest of the day. I may have missed a time or two in the flurry from 4-8 p.m. It did not happen every time, but when it did happen, it defaulted to Republican every time.

The second thing I noticed was I began to get people who swore they were registered Dems, and in fact some had voter registration cards that said they were registered Dems and when I put them into the computer, they came up Republicans. The first time it happened, I thought it was a

fluke. The second time, I thought it was a problem; the third time I started keeping track. I started keeping track at 5 p.m. and by the time I closed at 8 p.m., it had happened 19 times that a Democrat was called a Republican and 3 times that a Republican was called a Democrat. In all cases, I gave them the proper ballot according to their registration card or what they insisted was their party. Likewise I wrote on the "ticket" "was Dem" or in three cases "was Rep".

I had a count of 1129 on my e-poll book at the end of the night.

Unfortunately, I did not keep track of the race of the people involved but it was primarily Black and Hispanic voters. Of course I was in South Phoenix so one could expect more Black and Hispanic voters to come to that polling place. But one African American woman said she had registered Dem when she was 18 and had never changed and she was 32. She came up Republican. Another African American woman, who was in her 60s, said she had voted Democratic in every election in her life and she was voting Democratic in this one. She too came up Republican. Of the three who said they were Republicans but came up Democrats, two were white males and one was a Hispanic female.

At one point, there were three African Americans standing in front of my table. A male police officer was having trouble with his son voting and was working with Pat, the other e-pollbook worker to my right. The 60 plus-year-old female was with me, and a very young, very angry male was in the middle doing his provisional because his address failed to come up. He was very angry and at first said he was not voting provisional. He said this happens every time, that he had gone down and taken care of this (changing address, making sure he was registered Dem) three months ago so this would not happen, so why did it happen, that it was happening since Obama, that it was directed at Blacks etc. The older Black cop calmed him down and said, vote. If you don't, you are doing exactly what they want you to. The older woman said, people died so you could vote, now vote. The young man calmed down and said, well we got to do something about it. I said I'm keeping track of it and pointed to my folder where I was keeping hash tags and I said I will be turning this over. He said to who? I said, to the ACLU. He said okay and finished the voting process.

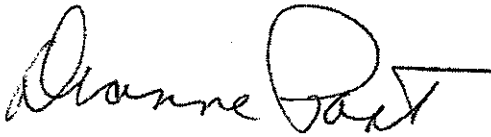
6. The following day, 23 March 2016, I wrote my recollections to memorialize them because I knew this was an issue that needed investigation. Likewise I have kept the sheet of paper with my hash tag counts.

7. On 23 March, 2016, I sent these recollections, and other voting place issues, to my recruiter and the lead trainer at Maricopa County Elections. No one has contacted me about it. I testified at the legislative Elections Committee hearing on 28 March but they only gave me one minute. I had previously sent my written testimony to each member on Saturday 26 March because I figured they would have many people wanting to speak and I might not get much time. At that hearing, Eric Spencer from the Secretary of State's office gave me his card and asked me to call him to set up an appointment. We met on 1 April 2016.

8. Based upon reasonable inquiry, I believe this Affidavit is well grounded in fact. The statements and matters alleged herein are within my personal knowledge, and true and correct to the best of my knowledge and belief, except as to those allegations stated upon information and belief, and, as to those allegations, I believe them to be true.

9. Pursuant to Rule 80(i), Arizona Rules of Civil Procedure, I declare under penalty of perjury that the foregoing is true and correct.

Date: 7 April 2016_ _ _ _ _




Dianne Post

I, Cathline Rivera, hereby declare as follows:

- 1) My date of birth is July 11, 1974.
- 2) I reside at 4315 E Thunderbird Rd #221 Phoenix, AZ 85032.
- 3) I am a registered Democratic Party elector registered in Maricopa County, and my voter ID is 4379944.
- 4) I registered as a Democrat only one time (online) on February 18, 2016.
- 5) When I received my card I noticed that the party affiliation was "none."
- 6) Later I received a second voter registration card dated 3/4/2016 that says party=Dem, though I never reregistered.
- 7) On the date of the PPE, I was required to vote a provisional ballot.
- 8) Based on reasonable inquiry, I believe this Affidavit is well grounded in fact. The statements and matters alleged herein are within my personal knowledge, and true and correct to the best of my knowledge and belief, except as to those allegations stated upon information and belief, and, as to those allegations, I believe them to be true.
- 9) Pursuant to Rule 80(i), Arizona Rules of Civil Procedure, I declare under penalty of perjury that the foregoing is true and correct.

Date:

4-7-16



[Cathline Rivera]

AFFIDAVIT

I, Teri J. Shea, hereby declare as follows:

1. My date of birth is 06/26/1984.
2. I am a resident of Peoria, AZ.
3. I am well acquainted with N/A, who is N/A.
4. On 4/5/2016, I was present at Home.
5. At that time, I witnessed THAT THE STATE "DID NOT RECEIVE A CHANGE OF ADDRESS" AND THUS MY VOTER REGISTRATION WAS INVALID.
6. I clearly remember that I DID FILE A CA because I WAS ISSUED A NEW VOTER ID CARD.
7. I HAVE BOTH DOCUMENTS TO VERIFY THIS CLAIM,
8. Based upon reasonable inquiry, I believe this Affidavit is well grounded in fact. The statements and matters alleged herein are within my personal knowledge, and true and correct to the best of my knowledge and belief, except as to those allegations stated upon information and belief, and, as to those allegations, I believe them to be true.
9. Pursuant to Rule 80(i), Arizona Rules of Civil Procedure, I declare under penalty of perjury that the foregoing is true and correct.

Date: 4/9/2016


[name]

AFFIDAVIT

1. Patricia Lindley Shute, hereby declare as follows:

1. My date of birth is October 4, 1938.
2. I am a resident of Phoenix, Maricopa, Arizona.
3. I am a regular voter, am registered as a Democrat and have for many years received my ballots exclusively by mail, returning them early. I do not own a TV or radio, and don't feel the need to know exactly when the primary is, because my ballot is always in early. I require a mail in ballot because of difficulty getting around. I no longer drive, and am pretty much a shut in due to health issues. However, I am very concerned about and interested in the political issues facing our country.
4. I was therefore very surprised when on the day of the primary, a friend stopped by late in the afternoon as agreed upon, bringing me some beets from his garden, and apologized for being so late. He explained that he had just waited many hours in long lines to vote in the primary.
5. As I told my friend, I couldn't understand why I had not received my mail in ballot. I told him that I didn't even know where to go to vote and hadn't realized that the primary was on that day. After Tom left, I even got on the Voter Registration website, because I thought perhaps my Voter registration had somehow gotten changed or cancelled. I did confirm that I was still registered to vote and as a Democrat, which would have allowed me to vote in the presidential primary.
6. By the time I realized that I had not been sent my mail in ballot, I would have had to go by bus to vote. It was already late in the day and my friend had told me that the lines were taking hours. I knew that I could not have taken buses and stood in line with my health difficulties and very swollen legs.
7. I would have voted. I feel my right to vote was obstructed due to not receiving my ballot. I would like to believe that my vote would have counted.
8. Based upon reasonable inquiry, I believe this Affidavit is well grounded in fact. The statements and matters alleged herein are within my personal knowledge, and true and correct to the best of my knowledge and belief, except as to those allegations stated upon information and belief, and, as to those allegations, I believe them to be true.
9. Pursuant to Rule 80(f), Arizona Rules of Civil Procedure, I declare under penalty of perjury that the foregoing is true and correct.

on 6 April 2016 Patricia Lindley Shute

trialer

1 DECLARATION OF JAMES "JIM" MARCH SIMPSON

2 I, JAMES "JIM" MARCH SIMPSON, hereby declare:

- 3 1. I make the following declaration. I have personal knowledge of the matters set forth below, and, if
4 called upon to do so, would testify competently thereto.
- 5
- 6 2. I was born 4/1/1966; I married Jill Simpson in late 2013 and took her last name. I used to be known as
7 James "Jim" March and I now reside in Fort Payne Alabama.
- 8
- 9 3. I have been an election observer in Maricopa County for the Maricopa County Libertarian Party, as has
10 John Brakey. Both Mr. Brakey and I are connected with AUDIT-AZ, a statewide organization that
11 evaluates election security matters. We have been observers in Maricopa County before under either
12 the Maricopa County Democratic Party or Libertarian Party. I am a computer systems tech and system
13 administrator of many years experience and have served as the Libertarian Party appointee to the Pima
14 County Election Integrity Commission, a body that advises the Pima County Board of Supervisors on
15 election matters. My efforts in Maricopa (and the contents of this declaration) are not connected to my
16 service in that venue. I lived in Arizona from September of 2006 to February 2013 and have remained
17 alert to Arizona election issues in the years since.
- 18
- 19 4. I have served as an expert witness in other election integrity-related lawsuits in Arizona and elsewhere,
20 and have a 20+ year professional background in technology issues. I have been studying security issues
21 related to electronic voting systems since mid-2003 and have served as plaintiff, expert witness and
22 technical support for a number of lawsuits, mostly in Pima County AZ.
- 23
- 24 5. I have been following the recent developments and controversies surrounding the Arizona primary
25 election, especially on the Democratic side (Clinton versus Sanders). A consistent theme is that people
26 are complaining that their voter registration record was either obliterated or changed from "Democrat"
27 to something else.
- 28

1 6. When studying whether or not a particular avenue of attack to an election process is possible or likely,
2 one of the variables to analyze is "attack team size" - that is, how many people would it take to carry
3 out the attack? We know that historically, paper based elections require large attack teams which in
4 turn require a high degree of "tolerance of corruption" among local and state governments. Attacks of
5 this sort have happened and are fairly well documented in historical records - a very large-scale set of
6 attacks were conducted against election processes in Baltimore MD in the 1840s for example,
7 involving grabbing lower-income and or "homeless" people off the streets, "cooping" them in makeshift
8 prisons, getting them drunk and taking them around to various polling places to "vote". This effort
9 was run by the virulently anti-immigrant "Know-Nothing Party", and they are suspected of killing
10 Edgar Allen Poe in such a scheme when they realized they had kidnapped and "cooped" one of the best
11 writers and journalists in the US. The Tammany Hall political machine in New York City was also
12 infamous for large-scale election fraud from roughly the Civil War period to about 1913 when they lost
13 control over the NYPD as "Big Tim Sullivan" mentally collapsed from syphilis.

14
15 7. In the modern era, local and state election processes can be overseen by federal authorities since the
16 US Supreme Court put the federal government back in the civil rights protection business in Brown v.
17 Board of Education (1954) after a long hiatus. Therefore, attacks to election processes need to be
18 "sneakier" than in the 19th and early 20th centuries, with a much smaller "attack team size" (ideally as
19 low as "1") and without leaving obvious traces. Massive attack teams the size of Tammany Hall or the
20 Know-Nothings are now presumed to be basically impossible by most serious students of election
21 security. At worst examples can be found of specific precincts where all the pollworkers are corrupted
22 - Clay County Kentucky serves as a warning that this is in fact possible and happened in 2004 and
23 2006: http://www.huffingtonpost.com/brad-friedman/ky-election-officials-arr_b_177468.html

24
25 8. For an example of an election security analysis based on the concept of attack team size, see also this
26 paper published by NIST from Eric Lazarus, David Dill and Bruce Schneier (2010) - I helped Eric
27 Lazarus with some of the early calculations that led to this paper:

1 [http://csrc.nist.gov/groups/ST/UOCAVA/2010/PositionPapers/LazarusDillSchneier_QuantitativeAnalysis](http://csrc.nist.gov/groups/ST/UOCAVA/2010/PositionPapers/LazarusDillSchneier_QuantitativeAnalysisInternetVotingV01.pdf)
2 [isInternetVotingV01.pdf](http://csrc.nist.gov/groups/ST/UOCAVA/2010/PositionPapers/LazarusDillSchneier_QuantitativeAnalysisInternetVotingV01.pdf)
3

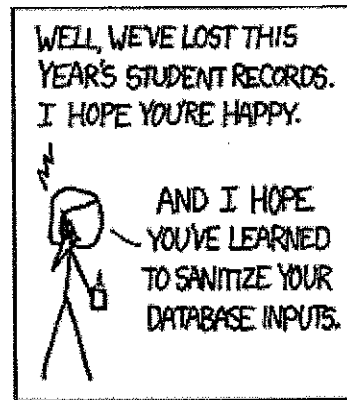
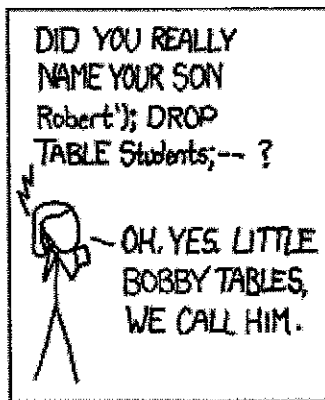
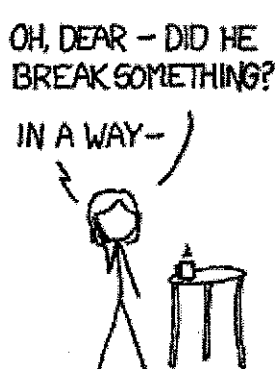
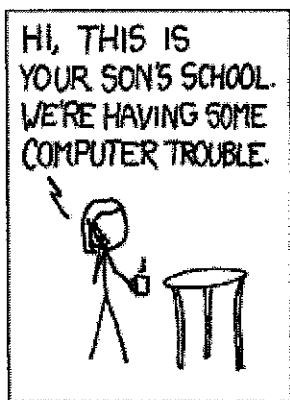
4 9. In Arizona as with most other states the voter registration records are “centralized” at one statewide
5 facility; in the case of AZ this electronic record resides at the Secretary of State’s office and under AZ
6 law as I’m aware of it, forms the official record of each voter. If that database is attacked it could
7 easily result in the kind of voter registration problems thousands of AZ voters are complaining about
8 right now. The most likely form of *external* attack (with an attack team size of merely *one* as the most
9 likely number – yes, a “solo hacker”!) is an attack based on “SQL injection”, also known as a “failure
10 to sanitize data inputs”.

11
12 10. To understand SQL injection, first realize that most serious databases are going to be some form of
13 “SQL” - Structured Query Language. It is literally both a database and a powerful programming
14 language. As with any programming language you can type in commands in something “slightly
15 English-like”, such as “DROP TABLE” for “get rid of a certain section of data”.

16
17 11. Like any database, there will also be places where you can either enter new data or view existing data.
18 These “data fields” are NOT supposed to be able to take in SQL programming – they’re supposed to
19 be “sanitized” so that an SQL command cannot be “injected” via the path a user would use to enter or
20 view ordinary data.

21
22 12. A classic example of improper data sanitation is what happens when, say, a particular holder of a
23 driver’s license has a legitimate last name of “Null”. If everything is written correctly it will work as
24 normal. If not...the user cannot be entered in the system or something otherwise goes haywire.
25 Examples of this happening in government databases are widespread and legendary:
26 <http://www.wired.com/2015/11/null/>
27

28 13. Geek humorist Ralph Munroe (who is widely respected in computer security circles) put it like so:



14. It now appears highly likely that the Arizona statewide voter registration system suffered from this class of trouble or something very similar. To find out, create a fake test-voter with a last name of "Null" and see what happens. Try the "Little Bobby Tables" attack as well, or some variant.
15. It may also be possible to go to previous iterations of the database stored "offline" (backed up to, say, tape media that is not immediately accessible) to see if there are unexplained changes in the database from before a suspected hack took place in the days/weeks/months(?) leading up to the election. One hopes the people administering the database keep backups of this sort, long-term on a month-to-month basis at a minimum – that would be standard practice for a serious data warehouse of any sort. Put another way, had the "Little Bobby Tables" attack in the cartoon actually occurred, the school IT guys should have been able to restore the data from tape or another resource...part of the joke (to nerds like me) is that they failed to do that AND failed to make sure commands couldn't be entered as data. In the case of the AZ election data, since the changes were done subtly in the background, the proper data administrators and entry clerks might not have known that voter registration data was being altered in the background (as opposed to the whole thing trashed) so they might not have known they needed to pull up backups. Also note that they wouldn't have wanted to do that because...well, let's say the attack occurred a month ago. They could roll back to the last saved state of the data from before the attack but they'd also have to enter in whatever legitimate changes they'd done to the data since (possibly by hand/typing) – those would all be lost. Very annoying to say the least.

- 1 16. There **should** be an audit log record showing who changed what and when. If there isn't...well, that's
2 not very professional. (Neither is running a database with unsanitary inputs of course...)
3
- 4 17. As the icing on this cake, the "Hivecomm" Twitter feed (a known "core Anonymous" discussion area)
5 was alive just before March 27th 2016 with reports that they had "test hacked" the Arizona central
6 voter registration database themselves. As it contained self-incrimination that they had test-hacked the
7 same databases as the alleged actual hackers had before the primaries, this discussion is now purged as
8 of this writing, however key portions have been archived at:
9 <http://ontd-political.livejournal.com/11301398.html> plus the full report they promised there is now
10 available at: [https://anonymousinvestigationblog.wordpress.com/2016/03/26/anonymous-report-was-](https://anonymousinvestigationblog.wordpress.com/2016/03/26/anonymous-report-was-arizonas-voter-registration-database-hacked/)
11 [arizonas-voter-registration-database-hacked/](https://anonymousinvestigationblog.wordpress.com/2016/03/26/anonymous-report-was-arizonas-voter-registration-database-hacked/) - note that the final report says nothing illegal was done,
12 something I find...well, questionable knowing that bunch. But again, we are talking about POST-
13 election testing by Anonymous, not anything that could have affected the election outcome.
14
- 15 18. **To quickly recap:** we have strong reason to suspect that something went wrong with the voter
16 registration data, we know that a solo-attacker external exploit is often possible (usually by way of
17 SQL injection, the "first trick a beginner hacker learns" as Anonymous correctly points out) and that
18 claims have been made that the attack has been repeated by "grey hat" (good motives, questionable
19 legality) security testers with a well known track record. It is therefore not at all a stretch to allege that
20 this did in fact happen and there are easy ways to determine via proper court discovery (without risk of
21 further compromise) whether or not this class of attack actually occurred.
22
- 23 19. The government agency that was attacked might not want to admit it...another reason why independent
24 discovery of what really happened here and what threats to the data are possible is vital to maintaining
25 basic democratic concepts and sanity in the election process.
26
- 27 20. There are other ways the data could have been altered including attacks by authorized users. But
28 attacks carried out on-site actually have "attack team sizes" greater than one person under many of the

1 plausible scenarios – somebody has to design the attack and get it into the systems in question if they're
2 going to enter the actual premises, with some kind of excuse needed (or cover) to do so. This is why
3 it's vital to look at the audit logs, study the data and do an analysis of the potential threat vectors
4 (including whether a "Bobby Tables" attack is possible and through what systems, online or local,
5 physical site security and more) to get to the bottom of what happened in this election.
6

7 21. Based upon reasonable inquiry, I believe this Affidavit is well grounded in fact. The statements and
8 matters alleged herein are within my personal knowledge, and true and correct to the best of my
9 knowledge and belief, except as to those allegations stated upon information and belief, and, as to
10 those allegations, I believe them to be true.
11

12 I declare under penalty of perjury under the laws of the States of Alabama and Arizona (including
13 Rule 80(i), Arizona Rules of Civil Procedure) that the foregoing is true and correct.

14 Executed this 7th day of April, 2016 at Fort Payne, Alabama.
15

16 
17

18 James "Jim" March Simpson
19
20
21
22
23
24
25
26
27
28

AFFIDAVIT

I, Alisa Wolfe, hereby declare as follows:

1. My date of birth is 04/03/1970.
2. I am a resident of Tucson, AZ, USA.
3. I am well acquainted with _____, who is _____.
4. On March 22, 2016, I was present at _____.
5. At that time, I witnessed _____.
6. I clearly remember that _____, because _____.
7. _____.

8. Based upon reasonable inquiry, I believe this Affidavit is well grounded in fact. The statements and matters alleged herein are within my personal knowledge, and true and correct to the best of my knowledge and belief, except as to those allegations stated upon information and belief, and, as to those allegations, I believe them to be true.

9. Pursuant to Rule 80(i), Arizona Rules of Civil Procedure, I declare under penalty of perjury that the foregoing is true and correct.

Date: 4/8/2106 _____
[name]

On March 22, 2016 I went to the Cabrini Church in Tucson, AZ to vote. I was turned away saying I was not on the register. I went home and called the Pima County Recorder's office and they said I was a registered Democrat and that I was at the right place to vote, so I went back and demanded a provisional ballot. I then went home and called the Secretary of States office and they said my provisional ballot would not be counted because they said my party preference was OTHER; therefore, I was not eligible to vote.

I went down to the Pima County Recorder's office to find out why my party said OTHER since I had changed my party from INDEPENDENT to DEMOCRAT in July of 2015. I video recorded the conversation between the clerk and myself. She showed me a duplicate card which was filled out in January of 2016 changing my party preference from DEMOCRAT to OTHER. She kept saying I submitted a new card in January when I absolutely did not. I then noticed that the signature on both card was identical and that the second card was a copy of my card from July of 2015. When I pointed that out to her, she immediately stated that it was a glitch in the computer system and that she would change it back to DEMOCRAT right away and she guaranteed my my vote would be counted.

One the afternoon of March 22, 2016, 2 and 1/2 months after they said I sent in a new card, I received a new voter ID card in the mail. On April 7, 2016, 15 days after the clerk changed my voter party preference back to DEMOCRAT, I received another voter ID card in the mail.

AFFIDAVIT

1. Geoffrey Woods, hereby declare as follows:

1. My date of birth is September 19th, 1980
2. I am a resident of Phoenix, AZ
3. I am well acquainted with _____, who is _____
4. On March 22nd, 2016, I was present at North Hills Church @ 15025 N. 19th Ave, Phoenix
5. At that time, I witnessed voter suppression and election fraud.
6. I clearly remember that day, because I recorded much of it and have a good memory
7. _____

8. Based upon reasonable inquiry, I believe this Affidavit is well grounded in fact. The statements and matters alleged herein are within my personal knowledge, and true and correct to the best of my knowledge and belief, except as to those allegations stated upon information and belief, and, as to those allegations, I believe them to be true.

9. Pursuant to Rule 80(i), Arizona Rules of Civil Procedure, I declare under penalty of perjury that the foregoing is true and correct.

Date: 4/7/16

[name]