Dominion Voting Systems

TOPLINES

Dominion Voting Systems

- Dominion Voting Systems is a private company originally founded in Canada, but which now has a significant U.S. presence

    o Dominion has headquarters in Colorado under the subsidiary Dominion Voter Systems, Inc.

- Dominion is reportedly 75% owned by private equity firm Staple Street Capital, 12% owned by it's Co-Founder John Poulos, with the remainder owned by other members of the firm's leadership

    o Prior to its 2018 acquisition by Staple Street, the firm appears to have been 100% owned by its Canadian parent company, and in turn, that firm's leadership

- Dominion is the second largest provider of U.S. election systems

    o Dominion provides election hardware and software in 28 states and Puerto Rico

Foreign Ties/Concerns

- Dominion Voting Systems was originally a Canadian company, but now has substantial U.S. operations

- Dominion's CEO John Poulos has confirmed that parts of its voting systems are made in China, specifically citing LCD screens and small components like capacitors and resistors

- Dominion has used Serbian software developers, and at one point had an office in Serbia

- Dominion has been a vendor for elections in The Philippines and Mongolia

Political Ties/Connections

- Dominion employees have made less than $1,300 in political contributions, but 93% of those contributions have gone to Democratic candidates or committees

- Dominion has retained lobbyists from Brownstein Hyatt Farber Schreck, including a pair of former Democratic aides

    o Brownstein lobbyist Brian McKeon previously worked for the Obama campaign and as an aide to Sens. Jeanne Shaheen and Barbara Boxer

    o Brownstein lobbyist Nadaem Elshami is a former Chief of Staff to Nancy Pelosi

- In 2019, Brownstein lobbyists donated to Sen. Mitch McConnell as the Senate was set to consider legislation that would have negatively impacted Dominion and other large voting machine vendors; the legislation as ultimately sidelined

- Staple Street Capital board member William E. Kennard was the Obama Administration's Ambassador to the EU

Rumors/False Allegations

- Allegations connecting Dominion to Democrats and prominent liberals are based on some real connections, but have been overstated

    o George Soros does not own Dominion; Mark Malloch-Brown, who is connected to Soros, is the Chairman of Smartmatic, which previously worked with Dominion

    o Dominion donated between $50,000 and $100,000 to the Clinton Foundation, and was previously a part of a Clinton Foundation commitment to provide election equipment to developing countries

    o Nancy Pelosi's former Chief of Staff, Brownstein Hyatt Farber Schreck lobbyist Nadeam Elshami, currently lobbies for Dominion

    o Blum Capital, the firm of Feinstein (D-CA)'s husband Richard Blum is a previous investor in software company Avid Technology which makes election software, but he does not have a "financial relationship" with Dominion

- A conspiracy theory claims secret computer programs called "hammer" and "scorecard" have been used to "steal" votes for Biden

    o Chris Krebs, the head of the U.S. Cybersecurity and Infrastructure Security Agency, said that this theory was "nonsense"

    o The theory comes from information given by Dennis Montgomery, a former government contractor who allegedly 'conned' the Pentagon into paying millions of dollars for anti-terrorism technology that did not work

    o Associates of Sheriff Joe Arpaio say Montgomery defrauded them by claiming that the "Hammer" software program could show a federal judge was "colluding" against Arpaio

    o The theory also claims that a company named VR System siphoned votes in battleground states, but VR systems does not make vote-counting machines, and its software was not used in the battleground states were votes were allegedly "stolen"

Technical Failures In The 2020 Election

- Machines from Dominion Voting Systems did experience technical failures on election night, but these errors were reportedly fixed and did not lead to improper vote counts

- Antrim and Oakland Counties in Michigan counties saw tabulation mistakes that were reportedly the result of human error, and the totals were corrected

    o A third Michigan county – which was not using Dominion – also saw a tabulation error

- Georgia experienced problems on election morning with machines made by KnowInk, a subcontractor of Dominion, in the counties of Morgan and Spalding, which prevented voters from casting ballots

    o The technology glitch was allegedly due to a software upload the night before the election, but Dominion has disputed that

    o Election officials extended voting hours and used paper ballots to work around the issue

Prior Instances Of Issues With Dominion's Machines

- In 2017 and 2019, hacking conferences were able to successfully hack and exploit vulnerabilities in Dominion voting equipment

- In 2013 and 2019, Texas twice rejected Dominion's voting machines due to both "multiple hardware and software issues," with an examiner saying the machines were "fragile and error prone"

- In Georgia's 2020 primary elections, Dominion voting machines saw numerous problems, with some being delivered late, some suffering power problems, and other failing to work

    o Dominion's electronic poll books "were plagued by freezing software and user error"

- Nevada's 2018 primary elections saw more than 300 reported errors from Dominion voting machines, including candidates being left off ballots in some instances

- In 2018, there were reports that Dominion voting machines had overheated in Palm Beach, Florida

- In 2012, Dominion voting machines in Florida awarded two Wellington Village council seats to losing candidates due to the machine being set up incorrectly

Potential Security & Vulnerability Issues

- Some Dominion voting machines include modems that could potentially connect to the internet, posing a hacking vulnerability

    o Dominion has modems in their vote tabulators and scanners

- The National Institute of Standards and Technology recommend that voting systems do not have wireless connections, since it makes it possible to connect them to external networks

COMPANY PROFILE

Dominion Voting Systems Has A Presence In The U.S. And Canada

Dominion Voting Systems Was Founded In 2003 According To The Company's Website. (Dominion Voting Systems, Accessed 11/12/20)

- **Dominion Voting Systems, Inc. – A Colorado-Based Subsidiary - Was Formed In 2010.** (Colorado Business Entity Search, Colorado Secretary Of State, Accessed 11/12/20)

- **US Dominion Inc. Was Formed In Delaware In June 2018, Before Its Sale To Staple Street Private Equity Was Announced.** (Delaware Department Of State, Accessed 11/12/20)

Dominion Voting Systems, Inc. Is Registered In Colorado And Has An Office In Denver. (Colorado Business Entity Search, Colorado Secretary Of State, Accessed 11/12/20; Dominion Voting Systems, Periodic Report, Colorado Secretary Of State, Filed 4/15/20; Dominion Voting Systems, Accessed 11/12/20)

- **"Dominion Voting Systems, Inc. ... Is Wholly Owned Subsidiary Of US Dominion, Inc., Which Is Incorporated Under The Laws Of The State Of Delaware, USA."** (Dominion Voting Systems, 12/28/18)

- **"Dominion Voting System, Inc. Does Not Have Any Subsidiaries."** (Dominion Voting Systems, 12/28/18)

In 2016, Dominion Said That It Had An Office In Serbia. "One major election technology company, Dominion Voting Systems (DVS), develops its systems in the U.S. and Canada but also has an office in Belgrade, Serbia." (Patrick Thibodeau, "One Election-System Vendor Uses Developers In Serbia," Computerworld, 10/5/16)

Company Leadership

John Poulos Is The CEO And Co-Founder Of Dominion Voting Systems. "My name is John Poulos, and I am the Chief Executive Officer and co-founder of Dominion Voting Systems. As a U.S.-owned company, we currently provide voting systems and services to jurisdictions across 30 states and Puerto Rico." (John Poulos, Testimony, Committee On House Administration, U.S. House Of Representatives, 1/9/20)

- **James Hoover Was A Co-Founder For Dominion Voting Systems.** ("Voting Technology Companies in the U.S. - Their Histories and Present Contributions," Accesswire, 8/10/17)

- **Ian MacVicar Was CFO And Executive Chairman From 2006-2018 And Is A Current Board Member.** (Ian MacVicar, LinkedIn, Accessed 11/12/20)

- **Nick Ikonomakis Is The Vice President Of Engineering At Dominion Voting Systems.** (Nick Ikonomakis, LinkedIn, Accessed, 11/12/20)

- **Kay Stimson Is The Vice President Of Government Affairs At Dominion Voting Systems.** "Kay Stimson, vice president of Government Affairs at Dominion Voting Systems, told CNN that the situation in Gwinnett County 'does not relate to system software and has had no impact on the accuracy of vote totals or tabulation.'" (Justin Gamble And Dianne Gallagher, "Georgia's Gwinnett County Blames Dominion Voting Systems For Day-Long Delay Reporting Results," CNN, 11/6/20)
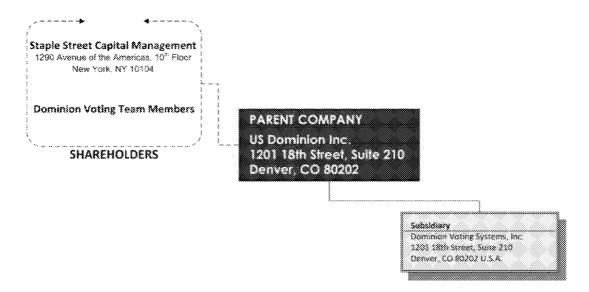
Dominion Is Privately Owned By Its Leadership Team And Private Equity Firm Staple Street

Dominion Voting Systems Is Privately Owned And Does Not Publicly Disclose Its Financials. "It's privately held and does not disclose its financials." (Ali Swenson, "Posts Falsify Ties Between Election Tech Firm And Democrats," The Associated Press, 11/10/20)

75.2% Of The Company Is Owned By Private Equity Firm Staple Street Capital, And 12 Percent Is Owned By The Company's Canadian CEO, John Poulos, According To A Letter Dominion Voting Systems Sent To The House Administration Committee Earlier This Year. "But in an April letter responding to a request by the House Committee on Administration, Dominion CEO John Poulos said Dominion is 75.2% owned by the New York-based private equity firm Staple Street Capital and that he, a

Canadian citizen, holds a 12% stake. No other investor owns more than a 5% stake, he said. Staple Street Capital did not return emails and phone calls for this story." (Ali Swenson, "Posts Falsify Ties Between Election Tech Firm And Democrats," The Associated Press, 11/10/20)

- **Dominion Also Said It Was 75.2% Owned By Staple Street And 12.4% Owned By Poulos In A 2018 Filing With Cook County, Illinois, And That No Other Owner Had A Stake That Was Larger Than 5% Of The Company.** ("Cook County Disclosure Of Ownership Interest Statement," Cook County, Illinois, 2018)

- **The Remaining Shareholders Are All "Dominion Voting Team Members" According To A 2019 Answer The Company Submitted To The State Of New Hampshire.** ("Response To The State Of New Hampshire Vote Tabulator Questions," LHS Associates, 4/30/19)

In 2018, Dominion Said It Completed A Deal To Be Acquired By Its Leadership Team And Staple Street Capital. "Dominion Voting Systems ('Dominion Voting') announces that it has been acquired by its management team and Staple Street Capital, a leading New York-based, middle-market private equity firm." (Press Release, "Dominion Voting Systems Acquired By Its Management Team And Staple Street Capital," Dominion Voting Systems, 7/16/18)

- **Previously, Dominion Voting Systems Was 100% Owned By Its Canadian Parent, Dominion Voting Systems Corp; That Company Appears To Have Primarily Been Owned By Its Principal Officers.** ("Ownership And Control," California Secretary Of State, 9/19/14)
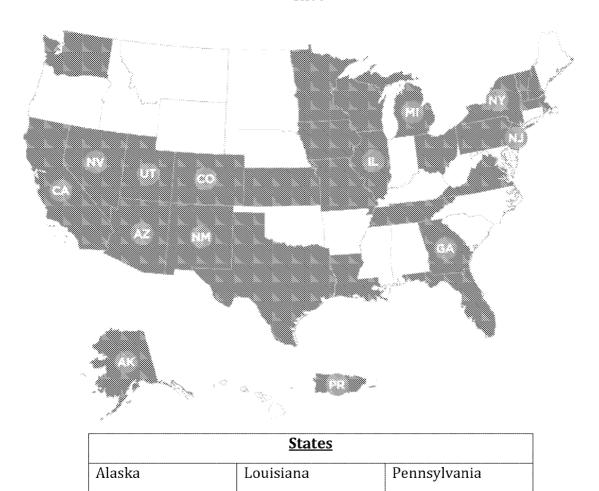
U.S. PRESENCE

As Of 2016, Dominion Was The Second Largest Provider In The U.S. Of Election Hardware And Software. ("The Business Of Voting: Market Structure And Innovation In The Election Technology Industry," Penn Wharton Public Policy Initiative, 2016)

Appendix A: Percentage Market Share by Vendor

Vendor	Registrants Reached	% Market Share
Election Systems & Software	93,380,867	43.8%
▓▓▓▓▓ Voting Systems	71,006,665	37.3%
Hart InterCivic	20,983,037	11.0%
Unisyn Voting Solutions	3,430,900	1.8%
MicroVote	3,291,260	1.7%
Danaher	2,685,409	1.4%
MTS	2,435,360	1.3%
IVS	1,336,070	0.7%
Five Cedars Group	972,475	0.5%
Clear Ballot	623,083	0.3%

Dominion Currently Has Provides Election Hardware And Software In 28 States And Puerto Rico

States		
Alaska	Louisiana	Pennsylvania

Arizona	Michigan	Tennessee
California	Minnesota	Texas
Colorado	Missouri	Utah
Connecticut	Nevada	Vermont
Florida	New Hampshire	Virginia
Georgia	New Jersey	Washington
Illinois	New Mexico	Wisconsin
Iowa	New York	Puerto Rico
Kansas	Ohio	

("About," Dominion Voting Systems, Accessed 11/12/20)

FOREIGN TIES

Originally A Canadian Company, Dominion Is Now Headquartered In Denver

Dominion Was "Originally A Canadian Company" But "Now Has Its Effective Headquarters" In Denver. "Dominion, originally a Canadian company that now has its effective headquarters in Denver, makes machines for voters to cast ballots and for poll workers to count them, as well as software that helps government officials organize and keep track of election results." (Jack Nicas, "No, Dominion Voting Machines Did Not Cause Widespread Voting Problems.," *The New York Times*, 11/11/20)

Dominion Voting Systems Contain Some Chinese Parts And Technology

In January 2020, Dominion Voting Systems CEO John Poulos Confirmed That Some Parts Of The Firm's Voting Systems, Including LCD Screens, Are Made In China. DOMINION VOTING SYSTEMS CHAIRMAN JOHN POULOS: "We do have components in our products that come from China. I don't know the exact percentage, but I can get that to the committee through my staff, happy to work with you in getting the exact number. Our products, tabulated products have always been manufactured in the United States. REP. ZOE LOFGREN (D-CA): "Before you go forward, what are the components that come from China?" POULOS: "So, for example, LCD components—the actual glass screen on the interface—down to the chip component level of the capacitors and resistors. Several of those components, to our knowledge, are not even—there's no option for manufacturing of those in the United State. We would welcome guidelines and best practices from the committee and from the federal government in terms of, this is not a problem that is unique election history." (Committee On The House Administration Committee, U.S. House Of Representatives, Hearing, 1/9/20)

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- **Dominion Voting Systems Contain Chinese Technology And Parts.** "The infiltration by foreign countries like China into election voting equipment is emerging as a growing concern among vendors, who are actually asking for more federal regulation as they grapple with a lack of domestic suppliers producing critical technologies. Top executives of the three largest voting machine vendors—Hart InterCivic, Dominion Voting Systems and Election Systems & Software— told the House Administration Committee Thursday they are hoping for guidance and support from the Department of Homeland Security on how to secure their subcontractors." (Michaela Ross, "Chinese Technology In Voting Machines Seen As Emerging Threat," *Bloomberg*, 1/9/20)

Dominion Has Used Software Developers In Serbia And At Least Once Had An Office There

In 2016, Dominion Said That Some Of Its Software Development Takes Place In Serbia With Serbian Developers, But Strongly Denied That This Had Any Impact On The Integrity Of The Firm's Software. "One major election technology company, Dominion Voting Systems (DVS), develops its systems in the U.S. and Canada but also has an office in Belgrade, Serbia. It was recently advertising openings for four senior software developers in Belgrade. 'Like many of America's largest technology companies -- which develop some of the software for their products in places like Asia, India, Ireland and the Mideast -- some of our software development is undertaken outside the U.S. and Canada, specifically, in Serbia, where we have conducted operations for 10 years,' said firm spokesman Chris Riggall, in an email. Dominion said it takes measures 'to ensure the accuracy, integrity and security of the software we create for our products.' 'First, all of our software is developed in-house by DVS employees and this work is not outsourced to third parties. Second, we rigorously pre-screen all new hires to identify any potential security concerns among any personnel involved in product development. Third, we conduct extensive internal testing of all new software to evaluate the functionality, accuracy and security of the code designed for our systems,' said Riggall." (Patrick Thibodeau, "One Election-System Vendor Uses Developers In Serbia," *Computerworld*, 10/5/16)

In 2016, Dominion Said That It Had An Office In Serbia. "One major election technology company, Dominion Voting Systems (DVS), develops its systems in the U.S. and Canada but also has an office in Belgrade, Serbia." (Patrick Thibodeau, "One Election-System Vendor Uses Developers In Serbia," *Computerworld*, 10/5/16)

Dominion Has Conducted Business In The Philippines And Mongolia

"Dominion Voting Systems ... Has Done Business In The Philippines And Mongolia." ("The Business Of Voting: Market Structure And Innovation In The Election Technology Industry," *Penn Wharton Public Policy Initiative*, 2016)

- **Dominion Has Provided Ballot Scanning Devices In Mongolia And The Philippines.** "The ICP precinct scanner technology proposed has been used globally in nations such as Mongolia and the Philippines. The Mongolian implementation in 2012 for their presidential election cycle involved 2,500 devices across a very diverse geography and demographic." ("Uniform Voting System Request For Proposal," Dominion Voting Systems, 2013)

- **Dominion Has Conducted Business In Mongolia As Recently As 2019.** ("Truth In Testimony Disclosure Form," House Committee On Administration, 1/7/20)

POLITICAL TIES & DONATIONS

Dominion Employees Have Made Less Than $1,300 In Political Donations, But These Have Predominantly Gone To Democrats

Dominion Voting Systems Employees Have Donated A Total Of $1,241.15 To Political Candidates Or Committees. (Federal Election Commission, Accessed 11/12/20)

- **Of That Amount, $1,155.90 – Or 93 Percent – Went To Democratic Candidates Or Committees.** (Federal Election Commission, Accessed 11/12/20)

- **One Employee Donated A Total Of $86.25 To President Trump.** (Federal Election Commission, Accessed 11/12/20)

The Largest Donation Made By A Dominion Employee Was $250, And A Total Of 9 Dominion Employees Have Made Donations. (Federal Election Commission, Accessed 11/12/20)

Dominion Hired Brownstein Hyatt Farber Schreck As Their Lobbyists, Including A Pair Of Former Democratic Aides

Dominion Voting Systems Hired Brownstein Hyatt Farber Schreck To Lobby For Them Beginning In February Of 2019, Paying Them $270,000 Since Then For Lobbying. (Lobbying Disclosure Act Database, United States Senate, Accessed 11/12/20; Lobbying Disclosure Act Database, United States Senate, Accessed 11/12/20;)

- **Brownstein Hyatt Farber Schreck Has Continued To Lobby For Dominion Through The Most Recent Quarter On "Issues Related To Election Security."** (Lobbying Disclosure Act Database, United States Senate, Accessed 11/12/20)

Dominion Voting Systems Retained Brownstein's Brian McKeon As A Lobbyist. ("Client Profile: Dominion Voting Systems," Center For Responsive Politics, Accessed 11/12/20; Catherine Ho, "Shaheen Aide Heads To Lobby Firm With Senate Democrats In Demand On K Street," *The Washington Post*, 9/7/16)

- **McKeon Was Previously An Aide To Sens. Jeanne Shaheen (D-NH) And Barbara Boxer (D-CA), And Also Worked On The Obama Campaign As Its Deputy Director Of Voter Protection.** (Catherine Ho, "Shaheen Aide Heads To Lobby Firm With Senate Democrats In Demand On K Street," *The Washington Post*, 9/7/16)

Dominion Voting Systems Retained Brownstein's Nadaem Elshami As a Lobbyist. ("Client Profile: Dominion Voting Systems," Center For Responsive Politics, Accessed 11/12/20)

- **Elshami Is A Former Chief Of Staff For House Speaker Nancy Pelosi (D-CA).** ("Nadaem Elshami," Center For Responsive Politics, Accessed 11/12/20)

Dominion Voting Systems Also Retained Four Other Brownstein Lobbyists. ("Client Profile: Dominion Voting Systems," Center For Responsive Politics, Accessed 11/12/20)

Lobbyist Donations

Brownstein Lobbyists McKeon And David Cohen Donated To Sen. Mitch McConnell (R-KY) In 2019 As The Senate Was Considering Legislation That Would Burden Dominion And Other Large Voting Machine Vendors; The Legislation Was Ultimately Sidelined. "The plans would likely burden the two largest electronic voting machine vendors in the United States, Election Systems & Software and

Dominion Voting Systems, with new regulations and financial burdens. Together, the companies make up about 80 percent of all voting machines used in the country and both have far-reaching lobbying arms in Washington D.C. Many of those lobbyists have contributed to the McConnell campaign, reported Sludge last month, an investigative outlet that focuses on money in politics. Sludge found that Brownstein Hyatt Farber Schreck lobbyist David Cohen, who has worked on behalf of Dominion Voting Systems this year, donated $2,000 to McConnell during this time. Brian Wild, who works with Cohen and has also lobbied Dominion, gave McConnell $1,000." (Nicole Goodkind, "Mitch McConnell Received Donations from Voting Machine Lobbyists Before Blocking Election Security Bills," Newsweek, 7/26/19)

Political Ties

William E. Kennard, Former Ambassador To The EU Under The Obama Administration, Sits On The Board Of Staple Street Capital, The Private Equity Firm That Acquired A Controlling Stake In Dominion Voting Systems In 2018. "Mr. Kennard currently is non-executive chairman and co-founder of Velocitas Partners LLC, an asset management firm and is also a member of the Operating Executive Board of Staple Street Capital, a private equity firm. He serves on the boards of directors of AT&T, Inc., MetLife, Inc. and Duke Energy Corporation, and Ford Motor Company. He has served as a director of several public companies including Sprint Corp., FON Group (formerly Sprint Nextel Corp.), The New York Times Company and Dex Media, Inc., as well as a number of private companies. He served as the United States' Ambassador to the European Union from December 2009 to August 2013. As Ambassador, Mr. Kennard worked actively to promote transatlantic trade and investment and to eliminate regulatory barriers to commerce. He was a key force behind President Obama's decision in February 2013 to launch negotiations on the ambitious Transatlantic Trade and Investment Partnership which aims to expand trade and investment across the Atlantic. Before serving as an Ambassador, Mr. Kennard was managing director of the global private equity firm The Carlyle Group from 2001 to 2009 where he led investments in the telecommunications and media sectors." (Press Release, "Biography: William E. Kennard," U.S State Department, Accessed 11/12/20; Press Release, "Dominion Voting Systems Acquired By Its Management Team And Staple Street Capital," Dominion Voting Systems Corporation, 6/18/18)

ALLEGED TIES AND CONSPIRACY THEORIES

George Soros

Despite Rumors, George Soros Does Not Own A Stake In Dominion, Even Though He Has A Tie To The Firm "One of the rumors traveling on the internet before Election Day was that liberal financier and philanthropist George Soros owned Dominion. He doesn't. There is a link between the two, though." (Fred Lucas, "4 Things To Know About Voting Machine Company That's Causing Stir," The Daily Signal, 11/9/20)

In 2009, Dominion Entered Into A Contract With Smartmatic, Which Builds And Implements Electronic Voting Systems Used In The 2010 Election In The Philippines. "Dominion entered a 2009 contract with Smartmatic, which builds and implements electronic voting systems, and provided it with optical scanners used in the 2010 election in the Philippines, Accesswire reported." (Fred Lucas, "4 Things To Know About Voting Machine Company That's Causing Stir," The Daily Signal, 11/9/20)

- **Lawsuits In The Philippines Ensued Over Glitches And Allegations Of Fraud After An Independent Review Of The Source Codes Used In The Smartmatic Machines Found Numerous Problems.** "Lawsuits in the Philippines ensued over glitches and allegations of fraud. An independent review of the source codes used in the machines found numerous problems. The review said, 'The software inventory provided by Smartmatic is inadequate, ... which brings into question the software credibility.'" (Fred Lucas, "4 Things To Know About Voting Machine Company That's Causing Stir," The Daily Signal, 11/9/20)

Smartmatic's Chairman Is A Member Of The British House Of Lords, Mark Malloch Brown, A Former Vice-Chairman Of George Soros' Investment Funds. "Smartmatic's chairman is a member of the British House of Lords, Mark Malloch Brown, a former vice-chairman of George Soros' Investment

Funds, former vice-president at the World Bank, lead international partner at Sawyer Miller, a political consulting firm, and former vice-chair of the World Economic Forum who 'remains deeply involved in international affairs.' The company's reported globalist ties have caused members of the media and government officials to raise questions about its involvement in the U.S. electoral process." (Bethany Blankley, "Officials Raised Concerns For Years About Security Of US Voting Machines, Software Systems," The Center Square, 11/9/20)

- **Malloch-Brown, Serves On The Open Society Foundations Global Board – Founded By George Soros, But Smartmatics Is Not Owned By Soros Himself.** "While the chairman of SmartMatics and the SGO Group, Mark Malloch-Brown, serves on the Open Society Foundations Global Board -- founded by George Soros -- SmartMatics is not owned by Soros himself, despite what the post circulating widely on social media suggested." ("Soros Does Not Own Voting Machine Company Smartmatics," The Associated Press, 3/13/20)

- **Smartmatics' Website Noted That "George Soros Has Never Had Any Ownership Stake Or Involvement With Smartmatic."** "Q: Does George Soros have any involvement in Smartmatic? A: No. George Soros has never had any ownership stake or involvement with Smartmatic." ("Smartmatic Fact-Checked," Smartmatics, Accessed 11/12/20)

Clinton Foundation

Dominion Voting (DELIAN Project) Is Listed Among Those Donors Who Have Donated Between $50,000 To $100,000 To The Clinton Foundation. ("Recognizing Our Generous Supporters," Clinton Foundation, Accessed 11/12/20)

In 2016, The Clinton Foundation Recognized Dominion Voting For Its 2014 Commitment To Expand "Access To Voting Technology" Through "Philanthropic Support" To The Clinton Foundation's DELIAN Project. "In 2014, Dominion Voting committed to providing emerging and post-conflict democracies with access to voting technology through its philanthropic support to the DELIAN Project, as many emerging democracies suffer from post-electoral violence due to the delay in the publishing of election results. Over the next three years, Dominion Voting will support election technology pilots with donated Automated Voting Machines (AVM), providing an improved electoral process, and therefore safer elections. As a large number of election staff are women, there will be an emphasis on training women, who will be the first to benefit from the skills transfer training and use of AVMs. It is estimated that 100 women will directly benefit from election technology skills training per pilot election." ("The DELIAN Project: Democracy Through Technology," Clinton Foundation, Accessed 11/12/20)

- **The DELIAN Project Was Dominion's Commitment To Provide Election Technology To "Emerging And Post-Conflict" Democracies.** ("The DELIAN Project: Democracy Through Technology," Clinton Foundation, Accessed 11/12/20)

Nancy Pelosi

Nadeam Elshami, Former Chief Of Staff For Pelosi, Works For Lobbying Firm Brownstein Hyatt Farber Schreck LLP, Which Was Hired To Represent Dominion. "The company also reported hiring the lobbying firm Vectre Corp. Dominion's first-ever lobbying firm is Brownstein Farber Hyatt & Schreck. Nadeam Elshami, Pelosi's former chief of staff, is one of the lobbyists on the account." (Megan R. Wilson, "Voting Machine Firm Adds Lobbyist Amid Election Hacker Concerns," Bloomberg, 4/1/19)

Richard Blum, Senator Dianne Feinstein's (D-CA) Husband

Blum Capital, Which Is Owned By Senator Diane Feinstein (D-CA)'s Husband, Richard Blum, Was An Investor In Software Provider Avid Technology, Which Does Provide Election Software, But Not To Dominion. "'Can someone tell me why Democratic Senator Dianne Feinstein's husband, Richard Blum, owns Avid Technologies (which provides the voting machines for our election)?' read an Instagram post viewed nearly 60,000 times. In fact, Avid Technology does not provide election software for Dominion or any other company — nor does Blum's firm currently own a stake in it. 'To officially correct

a misconception that arose on Twitter in the last 24 hours, Avid Technology, Inc. (NASDAQ: AVID) definitively states that we do not develop software for vote counting,' AVID wrote in a statement on Twitter on Saturday. 'Further, while Blum Capital was an investor in our company, it has no holdings today.'" (Ali Swenson, "Posts Falsify Ties Between Election Firm And Democrats," *Associated Press*, 11/10/20)

Dominion Voting Systems Has Denied That Blum Has Any Financial Relationship With The Company. "Dominion Voting Systems rebuked claims that the company has a financial relationship with the husband of Sen. Dianne Feinstein and that the company manipulated the results of the 2020 election. 'The company has no financial relationship with Mr. Blum,' Kay Stimson, Dominion's vice president of government affairs, told the Dispatch. 'This is a false claim spread on social media.'" (Tyler Van Dyke, "Dominion Voting Systems Denies Financial Relationship With Dianne Feinstein's Husband," *Washington Examiner*, 11/11/20)
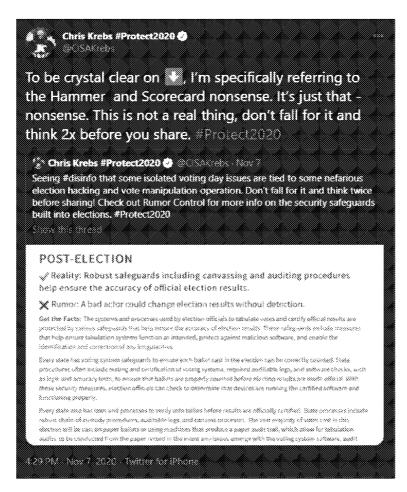
"Hammer And Scorecard"

A Conspiracy Theory Claims That Secret Computer Systems Called "Hammer" And "Scorecard" Have Been Used To "Steal" Votes For Biden. "A baseless conspiracy theory claims that secret computer systems called 'Hammer' and 'Scorecard' have been used to 'steal' votes for Biden. This theory relies on false information about voting machines, as well as false claims from a discredited former government contractor. There is no proof that Hammer and Scorecard exist." (Jane Lytvynenko And Craig Silverman, "Here's A Running List Of Debunked Postelection Rumors," *BuzzFeed News*, 11/9/20)

- **The Theory Claims That A "Supercomputer System" Called Hammer Was Being Used In Conjunction With Software Called Scorecard To "Steal" Votes In Multiple Swing States.** "The right-wing news site American Report floated the theory on Oct. 31, claiming that a 'supercomputer system' called Hammer was being used in conjunction with software called Scorecard to 'steal' votes in multiple swing states. It falsely claimed this same system helped commit voter fraud in 2012. There is zero evidence to back any of this up, but it spread widely, including on Fox News." (Jane Lytvynenko and Craig Silverman, "Here's A Running List Of Debunked Postelection Rumors," *BuzzFeed News*, 11/9/20)

"Chris Krebs, The Head Of The US Cybersecurity And Infrastructure Security Agency, Said On Nov. 7 That These Claims Were 'Nonsense.'" (Jane Lytvynenko And Craig Silverman, "Here's A Running List Of Debunked Postelection Rumors," *BuzzFeed News*, 11/9/20)

- **"'I'm Specifically Referring To The Hammer And Scorecard Nonsense. It's Just That - Nonsense. This Is Not A Real Thing, Don't Fall For It And Think 2x Before You Share,' Tweeted Krebs."** (Jane Lytvynenko And Craig Silverman, "Here's A Running List Of Debunked Postelection Rumors," *BuzzFeed News*, 11/9/20)

(Chris Krebs, Twitter, 11/7/20)

The Hammer And Scorecard Theory Is Based On Claims By Dennis Montgomery, A Former Government Contractor Who Allegedly 'Conned' The Pentagon Into Paying Millions Of Dollars For Anti-Terrorism Technology That Did Not Work." (Jane Lytvynenko And Craig Silverman, "Here's A Running List Of Debunked Postelection Rumors," *BuzzFeed News*, 11/9/20)

- **Montgomery Has A Long History Of Making Outlandish Claims That Fail To Come True" Including One Episode At The Height Of The War On Terror During The Bush Administration.** "'Montgomery has a long history of making outlandish claims that fail to come true 'Montgomery has a long history of making outlandish claims that fail to come true,' reported Will Sommer of the Daily Beast. 'As an intelligence contractor at the height of the War on Terror, Montgomery was behind what's been called 'one of the most elaborate and dangerous hoaxes in American history,' churning out allegedly fictitious data that once prompted the Bush administration to consider shooting down airplanes.'" (Jane Lytvynenko And Craig Silverman, "Here's A Running List Of Debunked Postelection Rumors," *BuzzFeed News*, 11/9/20)

- **Montgomery At One Point Claimed The Same Software, "Hammer," Would Enable Sheriff Joe Arpaio To Prove That A Federal Judge Was "Colluding" Against Him, A Claim That Arpaio's Associates Say Was Fake.** "Montgomery resurfaced in 2013, as a 'confidential informant' for controversial Arizona Sheriff Joe Arpaio. Arpaio was embroiled in a federal case over his department's treatment of Latino drivers, and furious at the federal judge who had ruled against him. According to reports and court testimony, Montgomery convinced Arpaio that he had a software called 'Hammer' that could prove that the federal judge was colluding against Arpaio with the Justice Department and then-Attorney General Eric Holder. Arpaio bought into Montgomery's claims, even as Arpaio's lawyers and detectives fumed that the 'proof' Montgomery

was providing about the judge was fake. At one point, Arpaio reportedly exploded at his subordinates after they complained that he was wasting money on Montgomery and pointing out the controversy over Montgomery's al Jazeera software. Still, the Maricopa County Sheriff's Office paid Montgomery $120,000 for the data he provided Arpaio in his fight with the judge." (Will Sommer, "Infamous 'Hoax' Artist Behind Trumpworld's New Voter Fraud Claim," Daily Beast, 11/9/20)

The Theory Also Claims A Voting Technology Company Named VR Systems Was Stealing Votes In Florida, Georgia, Texas, Pennsylvania, Wisconsin, Michigan, Nevada And Arizona. The story from the American Report also claimed that a voting technology company named VR Systems was part of the conspiracy. It said that "'SCORECARD is stealing votes in Florida, Georgia, Texas, Pennsylvania, Wisconsin, Michigan, Nevada and Arizona... In Florida, one of the transfer points is VR Systems Inc, based in Tallahassee." (Jane Lytvynenko And Craig Silverman, "Here's A Running List Of Debunked Postelection Rumors," BuzzFeed News, 11/9/20)

- **However, VR Systems Does Not Make Vote-Counting Machines, And Its Software Was Not Used In Those States.** "But as fact-checker Lead Stories reported, VR Systems does not make vote-counting machines, and its software isn't being used in swing states such as Georgia, Pennsylvania, Wisconsin, Michigan, Arizona, or Nevada." (Jane Lytvynenko And Craig Silverman, "Here's A Running List Of Debunked Postelection Rumors," BuzzFeed News, 11/9/20)

ELECTION DAY PROBLEMS

The Dominion Voting System Experienced Technical Failures On Election Night But Reportedly Did Not Lead To Improper Vote Counts

Dominion Software Was Used In Two Of The Five Michigan And Georgia Counties That Had Problems On Election Night 2020, And In Each Case The Software Did Not Affect The Final Vote Count. "The Dominion software was used in only two of the five counties that had problems in Michigan and Georgia, and in every instance there was a detailed explanation for what had happened. In all of the cases, software did not affect the vote counts. In the two Michigan counties that had mistakes, the inaccuracies were because of human errors, not software problems, according to the Michigan Department of State, county officials and election-security experts. Only one of the two Michigan counties used Dominion software." (Jack Nicas, "No, Dominion Voting Machines Did Not Cause Widespread Voting Problems.," The New York Times, 11/11/20)

Two Michigan Counties Had Problems With The Dominion Voting Machines Leading To Inaccurate Results Being Initially Posted

Two Michigan Counties – Antrim And Oakland – Saw Tabulation Mistakes, But Both Were A Result Of Human Error. "In the two Michigan counties that had mistakes, the inaccuracies were because of human errors, not software problems, according to the Michigan Department of State, county officials and election-security experts. Only one of the two Michigan counties used Dominion software." (Jack Nicas, "No, Dominion Voting Machines Did Not Cause Widespread Voting Problems.," The New York Times, 11/11/20)

- **Antrim County Reported A Sizable Win For Joe Biden On Election Which Was Later Corrected To Donald Trump Winning The County With 56 Percent.** "President Donald Trump didn't win Michigan, but he can put a small county in the victory column after an unusual second look at the results. Trump defeated Joe Biden in Antrim County, getting 56% of the vote, according to revised totals posted Thursday. Republican John James was the favorite in the Senate race. 'It certainly makes a lot more sense with people who are familiar with Antrim County,' said Jeremy Scott, deputy county administrator. Questions were raised after the county first reported a local landslide for Biden, a Democrat, in an area that usually votes Republican. Officials acknowledged the results seemed 'skewed' and promised a second look. More than 16,000 votes were cast." ("Small Michigan County Goes Back To The Win Column For Trump," Associated Press, 11/5/20)

- **The Failure In Antrim County Michigan Was Due To A Failure To Update The Software On The Machines.** "A failure to properly update software was the reason for a computer glitch that caused massive errors in unofficial election results reported from Antrim county, the Michigan Department of State said late Friday. And a U-M professor of computer science and engineering who specializes in voting systems and securities says it appears the snafu arose from an "unusual sequence of events very unlikely to affect any other jurisdictions." ("Antrim Vote Glitch: Expert Shares How County Mistakenly Flipped From Red To Blue," *Detroit Free Press*, 11/6/20)

- **6,000 Republican Voted Were Initially Counted As Democrat Votes In Antrim County.** "A glitch in software used to tabulate ballots in Antrim County, Michigan caused at least 6,000 Republican votes to be counted as Democrat, according to Michigan GOP Chairwoman Laura Cox. The miscalculation, Cox said in a press conference, was first reported by a county clerk. A short investigation revealed that 47 counties in Michigan may have also suffered from a similar glitch with the same software, which could have caused some red counties to rake in a higher number of Democrat votes than usual." (Jordan Davidson, "Software Glitch In Michigan County Tallied 6,000 Republican Votes As Democrat," *The Federalist*, 11/6/20)

- **The Initial Inaccurate County Was Due To Different Ballot Versions Not Being Merged Properly When Tabulated.** "County officials correctly loaded the new version onto the scanners for the affected precincts, but left the old version on scanners for precincts where the ballot was not affected by the late change, Halderman said. So although the scanners in the tabulators counted all the votes in each precinct correctly, the different versions of the ballot resulted in problems and erroneous vote totals when the precinct results were combined in the election management system, a separate software package used to manage and consolidate results before they are reported to the state, he said." ("Antrim Vote Glitch: Expert Shares How County Mistakenly Flipped From Red To Blue," *Detroit Free Press*, 11/6/20)

A Third County Had A Tabulation Error, But Was Not Using Dominion Systems

Oakland County Wrongly Declared A Commissioners Race By A Small Margin Which Was Retracted After Election Officials Caught The Error. "In Oakland County, Democrat Melanie Hartman was wrongly declared the winner of the commissioner's race by a 104-vote margin. A computer issue at the Rochester Hills clerk's office caused them to double-count some votes. After elections officials caught the error, Republican Adam Kochenderfer was declared the winner with 1,127 more votes than Hartman." (Ashley Nerbovig, "Antrim County Figures Prominently In Election Conspiracy Theory," *Detroit Free Press*, 11/8/20)

- **Oakland County Did Not Use Dominion, They Used Another Company Called Hart InterCivic.** "Dominion Voting Systems supplied Antrim County's voting software, as well as other counties in Michigan, according to the Michigan Secretary of State's website. The same site showed Oakland County does not use Dominion Voting Systems; it uses a vendor called Hart InterCivic." (Ashley Nerbovig, "Antrim County Figures Prominently In Election Conspiracy Theory," *Detroit Free Press*, 11/8/20)

Two Georgia Counties Experienced Problems With Voting Machines Made By Dominion And Subcontractor KnowInk

"A Technology Glitch That Created Voting Problems In Two Georgia Counties On [Election Day] Was Caused By [Dominion Voting Systems] Uploading An Update To Election Equipment The Night Before, A County Election Supervisor Said." (Kim Zetter, "Georgia County Official, Vendor Disagree On Cause Of Election Day Glitch," *Politico*, 11/4/20)

- **State Election Officials And Dominion Voting Systems Acknowledged That A Problem Occurred, But Disputed The Cause Was A Last-Minute Software Update.** "State election officials and the vendor that oversees the equipment acknowledged a problem occurred but have

disputed the county election supervisor's explanation, saying no such last-minute update had occurred." (Kim Zetter, "Georgia County Official, Vendor Disagree On Cause Of Election Day Glitch," *Politico*, 11/4/20)

Morgan And Spalding Counties Used Voting Machines Made By KnowInk, A Subcontractor Of Dominion Voting Systems, Which Prevented Voters From Casting Machine Ballots On Election Day, Causing Poll Workers To Give Out Paper Ballots And Having Superior Court Judge Extend Voting Hours. "The problem initially prevented voters from casting machine ballots on Election Day in Morgan and Spalding counties after the devices used to sign in voters at the polls failed to work, county officials said. Poll workers gave voters paper ballots until a workaround allowed the use of voting machines to resume. In response to the problem, Superior Court Judge W. Fletcher Sams extended voting hours. The counties use voting machines made by Dominion Voting Systems, but the electronic poll books that experienced the glitch were made by KnowInk, a subcontractor to Dominion." (Kim Zetter, "Georgia County Official, Vendor Disagree On Cause Of Election Day Glitch," *Politico*, 11/4/20)

Voting Machines Experienced A "Glitch" That Prevented Voters From Voting

Marcia Ridley, Election Supervisor For Spalding County Board Of Elections, Told *Politico* That Dominion "Uploaded Something" The Night Before "Which Is Not Normal, And Caused A Glitch." "Dominion, which prepares the poll books for counties before elections, 'uploaded something last night, which is not normal, and it caused a glitch,' Marcia Ridley, the elections supervisor at the Spalding County Board of Elections, told POLITICO on Election Day. That glitch prevented poll workers from using the poll books to program smart cards that the voters insert into the voting machines." (Kim Zetter, "Georgia County Official, Vendor Disagree On Cause Of Election Day Glitch," *Politico*, 11/4/20)

- **According To Marcia Ridley, A Representative For KnowInk And Dominion Voting Systems, The Problem Was Due To An Upload To The Machines By One Of Their Technicians The Night Before.** "Ridley said that a representative from the two companies called her office after poll workers began having problems with the equipment Tuesday morning. The representative said the problem was due to an upload to the machines by one of their technicians overnight, Ridley told POLITICO. 'That is something that they don't ever do. I've never seen them update anything the day before the election,' Ridley said. Ridley said she did not know what the upload contained." (Kim Zetter, "Georgia County Official, Vendor Disagree On Cause Of Election Day Glitch," *Politico*, 11/4/20)

- **Both Gabriel Sterling, The Voting System Implementation Manager For The Georgia Secretary Of State, And Dominion, Denied Marcia Ridley's Account And Claimed The Last Update Made Was On October 31st.** "Gabriel Sterling, the voting system implementation manager in the Georgia secretary of state's office, later disputed that account, telling reporters on Nov. 9 that the log files for the poll books show that the last update to them before the election had been made on Oct. 31. 'There was nothing that was done to the system after that date,' he said. Dominion, days after the election, also denied Ridley's account. 'We have confirmed that no Dominion company employee contacted the county about a last-minute update to the system,' a Dominion spokesperson said in a statement. 'Therefore, we have alerted the Georgia Secretary of State's office about this matter. The state can confirm that the final update took place on October 31st.'" (Kim Zetter, "Georgia County Official, Vendor Disagree On Cause Of Election Day Glitch," *Politico*, 11/4/20)

- **Ridley Has Continued To Push Her Original Statement And Described Dominion Having Sent Three Technicians To Have Traveled To Three Of Her Precincts To Make Additional Software Updates to Poll Books.** "Ridley, when told about the statements from Dominion and the state, did not back down from her original statement. Furthermore, she said that to fix the issue, Dominion sent three technicians on Election Day, who traveled to each precinct in her county to make a second software update to the poll books." (Kim Zetter, "Georgia County Official, Vendor Disagree On Cause Of Election Day Glitch," *Politico*, 11/4/20)

Jennifer Doran, Elections Director For The Morgan County Board Of Elections And Registration, Said The Issue Stemmed From The KnowInk Voter Access Cards Used With Dominion Voting Machines, Experienced The Glitch Not Allowing Poll Workers To Encode The Cards Properly. "Jennifer Doran, elections director for the Morgan County Board of Elections and Registration, said the issue was with how the KnowInk poll books encode a voter access card that is used with the Dominion voting machines. When voters sign in at a voting location, poll workers insert a voter access card into the Poll Pad tablet and encode it for that voter. The card is then inserted into voting machines to display the proper ballot for that voter. The glitch apparently prevented poll workers from encoding those cards." (Kim Zetter, "Georgia County Official, Vendor Disagree On Cause Of Election Day Glitch," *Politico*, 11/4/20)

PRIOR PROBLEMS WITH DOMINION'S SOFTWARE/MACHINES

Hackers Have Repeatedly Pointed Out Vulnerabilities In Dominion's Systems

In July 2017, Hackers At A Hacking Conference Were Able To Exploit Vulnerabilities In A Dominion Ballot Scanner And "Effectively Take Control Of The Machine That Counts Votes." "Hackers were able to use a screwdriver to get inside a ballot-scanning machine similar to what will soon be used across Georgia, allowing them to replace a memory card and effectively take control of the machine that counts votes. That was one of the vulnerabilities found in the Dominion ImageCast Precinct ballot scanners, according to a report Thursday from the DEF CON Voting Machine Hacking Village, a conference in Las Vegas where hackers tinkered last month with voting equipment to expose weaknesses." (Mark Niesse, "Hackers Highlight Vulnerabilities In Vote-Scanning Machines," *Government Technology*, 9/27/19)

In August 2019, A Hacking Conference Found U.S. Voting Equipment Including Dominion Systems Were Vulnerable To Hacking, With Many Of The Reported Vulnerabilities Having Been Reported A Decade Earlier. "This year's event allowed hackers to test voting equipment, including e-poll books, optical scan paper voting devices and direct recording electronic voting machines — all certified for use in at least one U.S. voting jurisdiction. 'Voting Village participants were able to find new ways, or replicate previously published methods, of compromising every one of the devices in the room in ways that could alter stored vote tallies, change ballots displayed to voters, or alter the internal software that controls the machines,' the report said. Despite the 'disturbing' findings of the report, the authors wrote that the findings were 'not surprising,' particularly in light of the fact that many of the election equipment cyber vulnerabilities found were 'reported almost a decade earlier.' Equipment that was tested included those made by leading voting machines companies Election Systems and Software (ES&S) and Dominion Systems." (Maggie Miller, "Hacker Conference Report Details Persistent Vulnerabilities To US Voting Systems," *The Hill*, 9/26/19)

Texas Repeatedly Rejected Dominion's Voting Machines Due To Both Hardware And Software Issues

In 2013, And Again In 2019, Texas' Secretary Of State Rejected Dominion's Voting Machines After Discovering "Multiple Hardware And Software Issues." "Texas rejected Dominion's voting machines twice, in 2013 and again in 2019. Two state offices discovered what they called 'multiple hardware and software issues that preclude the Office of the Texas Secretary of State from determining that [Dominion's] Democracy Suite 5.5-A system satisfies each of the voting-system requirements set forth in the Texas Election Code.' In October 2019, the Office of the Texas Secretary of State explained that Dominion didn't meet certification requirements under the Texas election code." (Fred Lucas, "4 Things To Know About Voting Machine Company That's Causing Stir," *The Daily Signal*, 11/9/20)

One Of The Primary Examiners For The State Of Texas Referred To The Dominion Voting System As "Fragile And Error Prone" Before Rejecting It. "One of the examiners for the state of Texas, which rejected the same Dominion system, referred to it as 'fragile and error prone.' It's first major test of that claim was moved back to May 19, coinciding with the primaries for state offices, and then to June 9. But at

last the examiner's description was born out." (Tom Baxter, "Georgia's New Voting Machines, 'Fragile And Error Prone,' Get Their First Test," Saporta Report, 6/15/20)

In 2018, Nevada's Primary Elections Run With Dominion Voting Machines Saw Glitches And Errors

In June 2018, The Nevada Primary Elections Were Riddled With Hundreds Of Glitches On The Dominion Voting System, Including Double Voting And Displaying The Wrong Ballots. "For hundreds of Nevada voters and candidates, June's primary election did not go as planned. Officials said then that a spate of well-publicized voting machine problems — including glitches that left some candidates off of ballots or displayed the wrong slate of ballot choices — only affected a small handful of voters. But a Reno Gazette Journal review of public records found more than 300 reported machine malfunctions across the state. More than 100 were recorded in Washoe County alone. Those software hiccups contributed to a double-voting snafu that forced officials to call a rare special election in Clark County. Records reveal they also saw Washoe threatened with at least one election-challenging lawsuit amid widespread reports of candidates being left off the ballot." (James DeHaven, "RGJ Investigates: Nevada's Voting Machine Problems Were Much Bigger Than First Thought," *Reno Gazette Journal*, 8/27/18)

- **Despite The Problems, Nevada Officials Did Not Abandon The Dominion Voting System.** "Yet county officials appear unlikely to abandon Dominion Voting Systems, the Canadian company that makes Nevada's voting machines. Officials in both Clark and Washoe counties, home to the state's two largest population centers, have said they plan to work closely with Dominion to resolve technical issues before November's general election." (James DeHaven, "RGJ Investigates: Nevada's Voting Machine Problems Were Much Bigger Than First Thought," *Reno Gazette Journal*, 8/27/18)

Georgia Had Problems With System Failures From Their Dominion Machines During Their Primary Election This Year

In 2019, The State Of Georgia Named Dominion As The Winning Vendor To Supply Election Systems In The State. "In Georgia, the system's purchase was authorized by the State Legislature in 2019 amid heavy lobbying by several vendors, including the winning bidder, Dominion Voting Systems, a Colorado-based company that is one of the nation's largest suppliers of election systems. Georgia had been under pressure to replace its older election machines since 2017, even before widespread claims of voter suppression emerged in the 2018 governor's race." (Nick Corasaniti And Stephanie Saul, "Georgia Havoc Raises New Doubts on Pricey Voting Machines," *The New York Times*, 6/11/20)

During The 2020 Georgia Primary, Dominion's Voting Machines Saw Numerous Problems, With Some Machines Being Delivered Late, Others Blowing Fuses, And Some Failing To Work And Needing A Technician To Fix. "In some cases on Tuesday, the new machines required too much extra power for aging polling locations, blowing fuses and never powering on. In others, workers who were still being trained just days before the election struggled with setup. Some polling places never even received the machines until the morning of the election. Jonathan Banes, who served as a precinct captain at Cross Keys High School in suburban DeKalb County, outside Atlanta, said the voting machines failed to work as workers tried to boot them up beginning at 5:30 a.m. Poll workers ultimately had to call in a technician to fix them. 'I still don't know what it was, whether it was the PIN authorization, the physical card itself which is inserted into the machine to access the admin portal to manage the functions of the device, or what,' Mr. Banes said. The technician who came to the school fixed the problem but never explained what the problem was, he said." (Nick Corasaniti And Stephanie Saul, "Georgia Havoc Raises New Doubts on Pricey Voting Machines," *The New York Times*, 6/11/20)

- **The Poll Workers Admitted That They Had Little Training In The Way Of Troubleshooting Scenarios.** "Mr. Banes, who is 29, was operating with only four poll workers but should have had a dozen — many of the older workers feared contracting Covid-19 — and only two of those who came had been trained, he said. The training in February 'was more of an introductory course, if

you can call it that,' he said. 'We didn't go into troubleshoot scenarios or how to deal with technical issues like this or have scenarios where voters cast ballots.' An online refresher training was held several weeks ago, he said." (Nick Corasaniti And Stephanie Saul, "Georgia Havoc Raises New Doubts on Pricey Voting Machines," *The New York Times*, 6/11/20)

Dominion's Electronic Poll Books Also Were Plagued With Freezing Software And User Error. "The electronic poll books, also new, were plagued by freezing software and user error. Kay Stimson, the director of government relations for Dominion, said the company would be doing a 'deep dive' into what happened, but maintained that the issues did not involve equipment problems on a large scale." (Nick Corasaniti And Stephanie Saul, "Georgia Havoc Raises New Doubts on Pricey Voting Machines," *The New York Times*, 6/11/20)

- **The Problems Involved Difficulties Activating Voter Verification Cards And Software Glitches As Well, An Issue A Princeton Computer Scientist Described As A "Meltdown.** "Many of the problems, she said, involved difficulties activating voter verification cards — which are inserted into the machines to start voting. The potential for problems with the new system was somewhat well known from the state's small-scale test in the 2019 elections, when a software glitch in the electronic poll books caused delays in most of the six counties where the test took place. 'A lot of people saw this coming, this meltdown, months in advance,' said Andrew Appel, a computer scientist at Princeton who studies voting machines." (Nick Corasaniti And Stephanie Saul, "Georgia Havoc Raises New Doubts on Pricey Voting Machines," *The New York Times*, 6/11/20)

In 2018, There Were Reports That Dominion Machines Overheated In Palm Beach, Florida

In 2018, Dominion Disputed Reports That Its Machines Overheated In Palm Beach, Florida. "In Palm Beach, the elections supervisor, Ms. Bucher, said the count was eventually reconciled, but it did not matter: The county missed the deadline to submit its numbers. She blamed the machine used, which she said overheated, and she disputed the manufacturer's account that no technicians had been called about what she said had been an overheating problem. 'We have no reports of an overheating system that night,' said Kay Stimson, vice president of government affairs for Dominion Voting, one of two companies certified to provide the ballot counting machines in Florida. 'The motors shipped there to be on hand are still in the box.'" (Frances Robles, "Nearly 3,000 Votes Disappeared From Florida's Recount. That's Not Supposed To Happen," *The New York Times*, 11/16/18)

In 2012, Dominion Voting Machines Awarded Victories To The Wrong Candidates In Florida

In 2012, Dominion Voting Machines Awarded Two Wellington Village Council Seats To Losing Candidates Due To The Machine Being Set Up Incorrectly. "Palm Beach County elections officials could have averted a software glitch that erroneously awarded two Wellington Village Council seats to losing candidates if they had followed the instruction manual, the manufacturer has told state election officials. Supervisor of Elections Susan Bucher vehemently denied the claim. 'I read the reference guide three times yesterday,' she said. 'Nowhere does it tell you to check for this, ever.' Even as the question of who is to blame grew murkier, a clearer picture of the error itself emerged Monday, with the company, Dominion Voting Systems, sending out a national advisory warning election officials how to avoid a similar mistake. In the advisory, Dominion also suggests that the mistake could have been caught before the election had one key test been performed differently." (Adam Playford and Pat Beall, "Read Manuel, Firm Says Of Election Snafu," *Sun Sentinel*, 4/3/12)

SECURITY & VULNERABILITY ISSUES

Some Dominion Voting Machines Reportedly Include Modems That Potentially Could Connect To The Internet, A Hacking Vulnerability

The Three Largest Voting Manufacturing Companies, Including Dominion, Acknowledged They All Put Modems In Some Of Their Tabulators And Scanners. "The three largest voting manufacturing companies — Election Systems &Software, Dominion Voting Systems and Hart InterCivic — have

acknowledged they all put modems in some of their tabulators and scanners. The reason? So that unofficial election results can more quickly be relayed to the public. Those modems connect to cell phone networks, which, in turn, are connected to the internet." (Kevin Monahan, Cynthia McFadden And Didi Martinez, "'Online And Vulnerable': Experts Find Nearly Three Dozen U.S. Voting Systems Connected To Internet," NBC News, 1/10/20)

- **Dominion Refused To Respond To "Numerous Requests From NBC News" Regarding How Many Of Their Tabulators With Modems Were Currently In Use.** "NBC News asked the two other major manufacturers how many of their tabulators with modems were currently in use. Hart said that it has approximately 1,600 such tabulators in use in 11 counties in Michigan. Dominion did not respond to numerous requests from NBC News for their sales numbers." (Kevin Monahan, Cynthia McFadden And Didi Martinez, "'Online And Vulnerable': Experts Find Nearly Three Dozen U.S. Voting Systems Connected To Internet," NBC News, 1/10/20)

- **The National Institute Of Standards And Technology Recommended That Voting Systems Should Not Have Wireless Network Connections.** "The National Institute of Standards and Technology, which provides cybersecurity frameworks for state and local governments and other organizations, recommends that voting systems should not have wireless network connections." (Kevin Monahan, Cynthia McFadden And Didi Martinez, "'Online And Vulnerable': Experts Find Nearly Three Dozen U.S. Voting Systems Connected To Internet," NBC News, 1/10/20)

- **Modems Make The Machines Vulnerable To Hacking By Making It Possible To Connect The Machines To External Networks.** "With the 2020 presidential election only ten months away, Appel and Skoglund believe all modems can and should be removed from election systems. 'Modems in voting machines are a bad idea,' said Appel. 'Those modems that ES&S [and other manufacturers] are putting in their voting machines are network connections, and that leaves them vulnerable to hacking by anybody who can connect to that network.'" (Kevin Monahan, Cynthia McFadden And Didi Martinez, "'Online And Vulnerable': Experts Find Nearly Three Dozen U.S. Voting Systems Connected To Internet," NBC News, 1/10/20)