

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

**CORECO JA'QAN PEARSON, VIKKI TOWNSEND
CONSIGLIO, GLORIA KAY GODWIN, JAMES
KENNETH CARROLL, CAROLYN HALL FISHER,
CATHLEEN ALSTON LATHAM and BRIAN JAY
VAN GUNDY,**

**CASE NO.
1:20-cv-4809-TCB**

Plaintiffs,

v.

**BRIAN KEMP, in his official capacity as Governor of
Georgia, BRAD RAFFENSPERGER, in his official
capacity as Secretary of State and Chair of the Georgia
State Election Board, DAVID J. WORLEY, in his
official capacity as a member of the Georgia State
Election Board, REBECCA N. SULLIVAN, in her
official capacity as a member of the Georgia State
Election Board, MATTHEW MASHBURN, in his
official capacity as a member of the Georgia State
Election Board, and ANH LE, in her official capacity as
a member of the Georgia State Election Board,**

Defendants.

**PLAINTIFFS' EMERGENCY MOTION FOR DECLARATORY,
EMERGENCY, AND PERMANENT INJUNCTIVE RELIEF AND
MEMORANDUM IN SUPPORT THEREOF**

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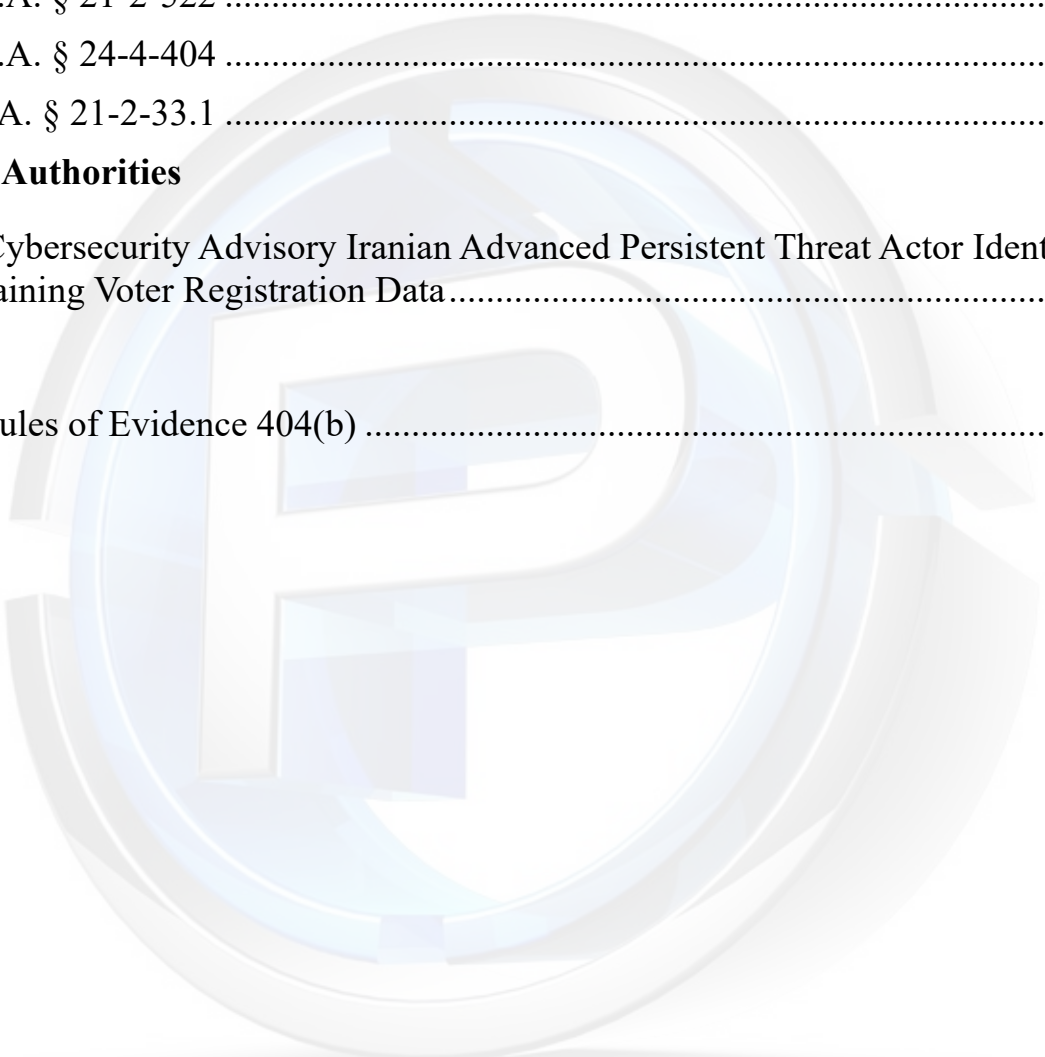
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**PLAINTIFFS' EMERGENCY MOTION FOR DECLARATORY,
EMERGENCY, AND PERMANENT INJUNCTIVE RELIEF AND
MEMORANDUM IN SUPPORT THEREOF**

COMES NOW Plaintiffs, by and through their undersigned counsel, and file this Emergency Motion for Declaratory, Emergency, And Permanent Injunctive Relief and Memorandum of Law in Support Thereof, respectfully requesting relief for the following reasons:

STATEMENT OF FACTS

The facts establishing the Plaintiffs' right to the relief sought herein are set forth in detail in the Complaint and its accompanying exhibits, all of which are incorporated herein by reference. We present only a summary of certain highlighted facts for the convenience of the court, and because the Complaint is in excess of 100 pages with 29 exhibits.

After a general election and hand recount audit, Vice President Biden was declared the winner of Georgia's General Election for President by a margin of 12,670 votes on November 20, 2020. But the vote count certified by the Defendants on November 20 is wrong. Tens of thousands of votes counted toward Vice President Biden's final tally were the product of illegality, and physical and computer-based fraud leading to "outright ballot stuffing."

On November 27, 2020, Union County officials advised that they are going to wipe the voting machines of all data and bring the count back to zero on

Monday, November 30, 2020. Resetting the machines would destroy relevant evidence now existing on each voting machine. This cannot be allowed.

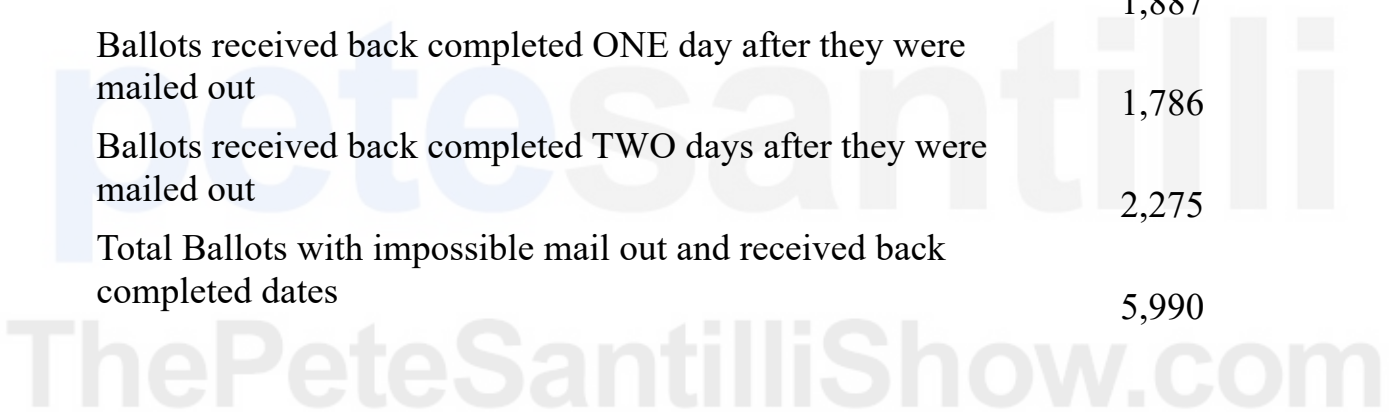
I. MAIL-IN BALLOTS AND A PATTERN OF FRAUD

Sworn affidavit testimony and detailed analyses of reported election results demonstrate that 96,600 mail-in votes were illegally cast. (See Compl. Exh. 9, Ramsland Aff., par. 11). As Plaintiffs’ expert, Russel Ramsland, explains:

The first red flag comes from mail-in ballots dates. The voter records of the counties show that 96,600 mail-in ballots were voted, yet the county records show they were never received back. Further, 42 mail-in ballots were received back completed *before* they were mailed out to the voter by the county, 1,887 mail-in ballots were received back completed *the same day* they were mailed out to the voter by the county, 1,786 mail-in ballots were received back completed *one day after* they were mailed out to the voter by the county and 2,275 mail-in ballots were received back completed only *two days after* they were mailed out to the voter by the county. This impossible phenomenon occurred throughout the counties of Georgia and were not an isolated event. Following is a summary:

GEORGIA MAIL-IN BALLOT ISSUES

Ballots received back completed BEFORE they were mailed out	42
Ballots received back completed THE SAME DAY they were mailed out	1,887
Ballots received back completed ONE day after they were mailed out	1,786
Ballots received back completed TWO days after they were mailed out	2,275
Total Ballots with impossible mail out and received back completed dates	5,990



Ballots with NO RETURN RECORD AT ALL	231,188
Ballots with NO RETURN RECORD & Cancelled	-134,588
Ballots with NO RETURN RECORD & Voted	96,600

(See Ex. 9 at pars. 15 – 19.)

Separately, evidence gathered by Matt Braynard in the form of recorded calls and declarations of voters, and analyzed by Plaintiffs' expert, William M. Briggs, Ph.D., shows that, based on a statistically significant sample, **the total number of mail ballots that voters mailed in, but were never counted, have a 95% likelihood of falling between 31,559 and 38,886 total lost votes.** This range exceeds the margin of loss of President Trump of 12,670 votes by at least 18,889 lost votes and by as many as 26,196 lost votes. (See Ex. 1, Dr. Briggs' Report).

Further, as calculated by Matt Braynard, there exists clear evidence of 20,311 absentee or early voters in Georgia that voted while registered as having moved out of state. Specifically, these persons were shown on the National Change of Address Database (NCOA) as having moved, or as having filed subsequent voter registration in another state. The 20,311 votes by persons documented as having moved exceeds the margin by which Donald Trump lost the election by 7,641 votes. (See Compl. at par. 120).

Additionally, Plaintiffs have presented evidence of a wide-spread fraud in a pattern of incidents that shows an absence of mistake – and always in the favor of

Vice President Biden. Rules of Evidence, 404(b), applicable to civil matters makes clear that, “(b) Evidence of other crimes, wrongs, or acts shall not be admissible to prove the character of a person in order to show action in conformity therewith. It may, however, be admissible for other purposes, including, but not limited to, proof of motive, opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or accident.” O.C.G.A. § 24-4-404; Fed. Rules of Evidence 404(b).

Specifically, an Affiant testified about the lack of process and the hostility only towards the Republican party, which is a violation of the Equal Protection Clause:

I also observed throughout my three days in Atlanta, not once did anyone verify these ballots. In fact, there was no authentication process in place and no envelopes were observed or allowed to be observed. I saw hostility towards Republican observers but never towards Democrat observers. Both were identified by badges.

(See Compl. at par. 86; Exh. 18 at par. 12, Aff. of Carlos Silva).

Another Affiant explained that his ballot was not only not processed in accordance with election law, he witnessed people reviewing his ballot to decide where to place it, which violated the privacy of his ballot, and when he tried to report it to a voter fraud line, he never received any contact or cooperation:

I voted early on October 12 at the precinct at Lynwood Park ... Because of irregularities at the polling location, I called the voter fraud line to ask why persons were discussing my ballot and reviewing it to decide where to place it. When I called the state fraud line, I was directed to a worker in the office of the Secretary of State...

(Exh. 19, Andrea ONeal Aff, at par. 3). This Affiant further testified that when they were an Observer at the Lithonia location, they saw many irregularities, and specifically **“saw an auditor sort Biden votes that he collected and sorted into ten ballot stacks, which [the auditor] did not show anyone.”** (*Id.* at par. 8).

Another Affiant testified about the use of different paper for ballots, that would constitute fraud, stating:

I noticed that almost all of the ballots I reviewed were for Biden. Many batches went 100% for Biden. I also observed that the watermark on at least 3 ballots were solid gray instead of transparent, leading me to believe the ballot was counterfeit. I challenged this and the Elections Director said it was a legitimate ballot and was due to the use of different printers. Many ballots had markings for Biden only, and no markings on the rest of the ballot.

(*See* Compl. at par. 85).

An Affiant, who attended the Audit testified: “While in Henry County, I personally witnessed ballots cast for Donald Trump being placed in the pile for Joseph Biden. I witnessed this happen at table ‘A’”. (*See* Exh. 13, at par. 29).

Another Affiant testified that

I witnessed two poll workers placing already separated paper machine receipt ballots with barcodes in the Trump tray, placing them in to the Biden tray. I also witnessed the same two poll workers putting the already separated paper receipt ballots in the “No Vote” and “Jorgensen” tray, and removing them and putting them inside the Biden tray. They then took out all of the ballots out of the Biden tray and stacked them on the table, writing on the count ballot sheet.

(*See* Exh. 17, Johnson Aff., pars. 4-5).

Another Affiant, a Democrat, testified in his sworn affidavit, before he was forced to move back to where he could not see, that he had in fact seen “absentee ballots for Trump inserted into Biden’s stack, and counted as Biden votes. This occurred a few times.” (See Compl. at par. 132).

“A Republican National Committee monitor in Georgia’s election recount, Hale Soucie, told an undercover journalist there are individuals counting ballots who have made continuous errors,” writes O’Keefe. Project Veritas, Watch: Latest Project Veritas Video reveals “Multiple Ballots Meant for Trump Went to Biden in Georgia.”¹ (See Compl. at par. 88). An Affiant in his sworn affidavit testified, that while at the Audit in Henry County, **“I personally witnessed ballots cast for Donald Trump being placed in the pile for Joseph Biden. I witnessed this happen at table “A”**”. (See Compl. at par. 76).

The expert analysis of Dr. Shiva Ayyadurai explains that the electronic data files must be analyzed before any wiping of data occurs.

This Declaration has presented, in multiple counties in Georgia, a consistent pattern of “High Republican, Low Trump” vote pattern anomalies that are improbable. In addition, it was discovered that when ethnic distributions were applied to three (3) counties, the only plausible

¹ <https://hannity.com/media-room/watch-latest-project-veritas-video-reveals-multiple-ballots-meant-for-trump-went-to-biden-in-georgia/>

explanation for the vote distribution was that President Trump received near zero Black votes, which is also highly improbable.

Analysis of DeKalb County enabled the discovery of a “weighted race” algorithm that transferred, using a “weight” of 1.22, approximately 48,000 votes from President Trump to Mr. Biden. In DeKalb County, 373,000 votes were cast. The approximate 48,000 votes transferred to Mr. Biden represents approximately 13% of the total votes cast in DeKalb County.

When one considers the entire State of Georgia, the number of votes cast in DeKalb county represents a mere 7.5% of the total number of votes cast in the entire State of Georgia, which was reported by the Secretary of State of Georgia to be 4,998,482 votes. The analysis herein reveals the number of voters may likely not equal of the number of votes given algorithms were in place to manipulate the tabulation of votes. This result demands that ballot images, log files, CVR, and electronic data files from each precinct be reviewed to validate the integrity of the election in Georgia. Until that time, the election results are unverifiable.

(See Ex. A to this Motion, at par. 121).

The expert analyses of proven illegal ballots counted from mail-in votes together with first-hand testimonials of fraudulent activity by election officials compels the conclusion that the Defendants’ certification of the election in Vice President Biden’s favor must be reversed.

II. BALLOT STUFFING

Georgia’s election process depends entirely on voting machines, tabulators and software purchased from Dominion Voting Systems Corporation (“Dominion”) that was compromised. Computerized vote recording and tabulations are controlled by software programs that were designed to cheat, and which were open to human

manipulation. In 2020, ballot stuffing is not simply counting votes of dead people, illegal aliens or out of state residents -- all of which clearly occurred here. See Exh. 1, Briggs Report; Exh. 9, Ramsland Affid. Instead, sworn affidavit testimony and detailed analyses of reported election results demonstrate that over 135,000 votes were illegally transferred from President Trump to Vice President Biden through an algorithm embedded in Dominion's software. (See Exh. 9, Ramsland Aff., para.11).

Manipulation of votes was apparent shortly after the polls closed on November 3, 2020. At approximately 10:00 pm, election officials evacuated State Farm arena where votes were being counted. Fulton County election officials claimed that a plumbing leak represented a threat. This was a lie. Video of the location at the time shows that there was no flood and no emergency. Instead, after all challengers and other personnel left, several election workers stayed behind and continued to feed votes into Dominion tabulators for over three hours, until 1:00 a.m. on November 4. (Compl. at par. 117).

Without supervision or challengers, election officials could have processed tens of thousands of votes from phony vote machine memory cards and thumb drives. They could also have processed thousands of illegal mail-in ballots that were cast by third-parties or even blank ballots that were counted over and over.

This kind of voter manipulation would not be uncovered during a recount because

the voting ballots and memory cards with the phony information would just be counted again and run through the same tainted tabulation machines.

The election software and hardware from Dominion, only recently purchased and rushed into use by Defendants Governor Brian Kemp, Secretary of State Brad Raffensperger, and the Georgia Board of Elections, was unsecure, and capable of being manipulated. (See Compl. at par. 4). This is shown by compelling evidence presented in *Curling, et al. v. Kemp, et. al*, Case No. 1:17-cv-02989 and reviewed in a lengthy order by Judge Totenberg at Doc. No. 964. It is also shown by the expert testimony presented with the Complaint, particularly Exhibits 8² (“Spider Declaration”) and 9 (Ramsland Affidavit).

Sworn testimony by a former military intelligence expert is consistent with the above Federal Government advisory, and confirms foreign interference through the electronic Voting Systems:

I was an electronic intelligence analyst under 305th Military Intelligence with experience gathering SAM missile system electronic intelligence. I have extensive experience as a white hat hacker used by some of the top election specialists in the world. The methodologies I have employed represent industry standard cyber operation toolkits for digital forensics and OSINT, which are commonly used to certify connections between servers, network nodes and other digital properties and probe to network system vulnerabilities.

² Exhibit 8 to the Complaint had a slip sheet that erroneously labeled it Exh. 7.

In my professional opinion, this affidavit presents unambiguous evidence that Dominion Voter Systems and Edison Research have been accessible and were certainly compromised by rogue actors, such as Iran and China. By using servers and employees connected with rogue actors and hostile foreign influences combined with numerous easily discoverable leaked credentials, these organizations neglectfully allowed foreign adversaries to access data and intentionally provided access to their infrastructure in order to monitor and manipulate elections, including the most recent one in 2020. This represents a complete failure of their duty to provide basic cyber security. This is not a technological issue, but rather a governance and basic security issue: if it is not corrected, future elections in the United States and beyond will not be secure and citizens will not have confidence in the results.

(See Compl. Exh. 8, Aff. at pars. 1 and 21).

The Federal government issued the following Advisory on October 20, 2020:

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

(Joint Cybersecurity Advisory Iranian Advanced Persistent Threat Actor Identified Obtaining Voter Registration Data, Attached as Exhibit B).

The Advisory further states,

Following the review of web server access logs, CISA analysts, in coordination with the FBI, found instances of the cURL and FDM User Agents sending GET requests to a web resource associated with voter

registration data. The activity occurred between September 29 and October 17, 2020. Suspected scripted activity submitted several hundred thousand queries iterating through voter identification values and retrieving results with varying levels of success [Gather Victim Identity Information (T1589)]. A sample of the records identified by the FBI reveals they match information in the aforementioned propaganda video.

(*Id.* at pp. 4-5).

Defendants Kemp and Raffensperger rushed through the purchase of Dominion voting machines and software in 2019 for the 2020 Presidential Election³. The certificate was awarded to Dominion but is undated. (*See Compl.* at par. 12). Similarly, a test report is signed by Michael Walker as Project Manager but it too is undated. (*See Id.*). They disregarded all the concerns that caused Dominion software to be rejected by the Texas Board of elections in 2018 because it was deemed vulnerable to undetected and non-auditable manipulation. They also ignored House Bill, HR 2722, that passed the House in 2019 mandating certain security precautions for voting machines, including that they not be connected to the internet and have security controls such as paper ballots, unlike those in the Dominion Voting Systems Democracy Suite package: “*This bill addresses election*

³ Georgia Governor Inks Law to Replace Voting Machines, The Atlanta Journal-Constitution, AJC News Now, Credit: Copyright 2019 The Associated Press, June 2019. <https://www.ajc.com/blog/politics/georgia-governor-inks-law-replace-voting-machines/xNXs0ByQAOvtXhd27kJdqO/>

security through grant programs and requirements for voting systems and paper ballots” (See Compl. at par. 112).

An industry expert, Dr. Andrew Appel, Princeton Professor of Computer Science and Election Security Expert recently observed with reference to Dominion voting machines: **“I figured out how to make a slightly different computer program that just before the polls were closed, it switches some votes around from one candidate to another. I wrote that computer program into a memory chip and now to hack a voting machine you just need 7 minutes alone with it and a screwdriver.”** (See Compl. at par. 13).

Evidence of a pattern of voter manipulation from the lack of physical security and compliance with professional standards, “the breaches” and the “glitches” recently seen in a Dominion system used in one Georgia County, where it is reported that 3,300 votes were found on memory sticks not loaded plus in Floyd county, another 2,600 were unscanned, and the “found votes” reduced Vice President Biden’s lead over President Trump⁴. (See Compl. at par. 112).

The opportunity to perform the unauthorized manipulation of votes

⁴ *Recount find thousands of Georgia votes*, Atlanta Journal-Constitution by Mark Niese and David Wickert, 11/19/20. <https://www.ajc.com/politics/recount-finds-thousands-of-georgia-votes-missing-from-initial-counts/ERDRNXP3REQTM4SOINPSEP72M/>

presented on multiple occasions, including when it was widely reported that as of 7 p.m. on Wednesday Fulton County Elections officials said 30,000 absentee ballots were not processed due to a pipe burst. Officials reassured voters that none of the ballots were damaged and the water was quickly cleaned up. (See Compl. at par. 81). But the emergency delayed officials from processing ballots between 5:30 a.m. and 9:30 a.m. Officials say they continued to count beginning at 8:30 a.m. Wednesday. The statement from Fulton County continued:

Tonight, Fulton County will report results for approximately 86,000 absentee ballots, as well as Election Day and Early Voting results. These represent the vast majority of ballots cast within Fulton County.

As planned, Fulton County will continue to tabulate the remainder of absentee ballots over the next two days. Absentee ballot processing requires that each ballot is opened, signatures verified, and ballots scanned. This is a labor-intensive process that takes longer to tabulate than other forms of voting. Fulton County did not anticipate having all absentee ballots processed on Election Day. Officials said they will work to ensure every vote is counted and all laws and regulations are followed.⁵

(See Compl. at par. 114.)

Plaintiffs have learned that the representation that “a water leak affecting the room where absentee ballots were counted” was false. The only water leak that

⁵ 4,000 remaining absentee ballots being counted in Fulton County, Fox 5 Atlanta, November 3, 2020, <https://www.fox5atlanta.com/news/pipe-burst-at-state-farm-arena-delays-absentee-ballot-processing>

needed repairs at State Farm Arena from November 3 to November 5 was a toilet overflow that occurred on November 3. It did not affect the room with ballot counting, but the water break representation led to “everyone being sent home.” Nonetheless, first six (6) people, then three (3) people stayed until 1:05 a.m. working on the computers. (See Compl. at par. 115)

In sum, there are multiple independent bases for concluding that the Defendants’ certification of the election in Vice President Biden’s favor was incorrect. With only 12,670 votes separating the candidates out of a total of 4,998,482 cast, the evidence shows far more illegal or fraudulent ballots than necessary to change the results. Defendant’s certification of the election must be set aside.

ARGUMENT AND CITATION OF AUTHORITY

I. PLAINTIFFS HAVE STANDING

Plaintiffs Pearson, Consiglio, Godwin, Carroll, Fisher and Latham are registered Georgia voters and are nominees of the Republican Party to be Presidential Electors on behalf of the State of Georgia. (Complaint, pars. 23-28). They each have standing to bring this action as voters and as candidates for the office of Elector under O.C.G.A. § 21-2-520, et seq. (election procedures for Georgia election contests). Presidential Electors “have a cognizable interest in ensuring that the final vote tally reflects the legally valid votes cast,” as “[a]n

inaccurate vote tally is a concrete and particularized injury to candidates such as the Electors.” *Carson v. Simon*, 978 F.3d 1051, 1057 (8th Cir. 2020) (affirming that Presidential Electors have Article III and prudential standing to challenge actions of secretaries of state in implementing or modifying state election laws); *see also McPherson v. Blacker*, 146 U.S. 1, 27 (1892); *Bush v. Palm Beach Cty. Canvassing Bd.*, 531 U.S. 70, 76 (2000) (per curiam).

II. PLAINTIFFS ARE ENTITLED TO INJUNCTIVE RELIEF.

Under Georgia state law, the Georgia Supreme Court has made clear that, “[Plaintiffs] need not show how the [] voters would have voted if their [absentee] ballots had been regular. [they] only had to show that there were enough irregular ballots to place in doubt the result.” *Mead v. Sheffield*, 278 Ga. 268, 272 (1994) (citing O.C.G.A. § 21-2-520, et seq.) (emphasis added).

The Eleventh Circuit recently held that, “To support a preliminary injunction, a district court need not find that the evidence positively guarantees a final verdict in plaintiff’s favor.” *Common Cause Georgia v. Kemp*, 347 F. Supp. 3d 1270, 1288 (11th Cir. 2018) (citing *Levi Strauss & Co. v. Sunrise Int’l Trading Inc.*, 51 F.3d 982, 985 (11th Cir. 1995)). To obtain a preliminary injunction the movant must satisfy four elements: 1) the likelihood of success on the merits; 2) irreparable harm; 3) the balance of equities favors the movant; and 4) whether the relief sought is in the public interest. *Cunningham v. Adams*, 808 F.2d 815, 818-19 (11th Cir.

1987); *see also United States v. Lambert*, 695 F.2d 536, 539 (11th Cir. 1983). All elements are met here.

“When the state legislature vests the right to vote for President in its people, the right to vote as the legislature has prescribed is fundamental; and one source of its fundamental nature lies in the equal weight accorded to each vote and the equal dignity owed to each voter.” *Bush v. Gore*, 531 U.S. 98, 104 (2000). The evidence shows not only that the Defendants failed to administer the November 3, 2020 election in compliance with the Georgia Election Code, but also that illegal or fraudulent votes were counted to make certain the election of Vice President Biden as President of the United States. This conduct violated Plaintiffs’ equal protection and due process rights as well their rights under Georgia law.

1. PLAINTIFFS HAVE A SUBSTANTIAL LIKELIHOOD OF SUCCESS ON THE MERITS.

Through detailed fact and expert testimony, including documentary evidence contained in the Complaint and its exhibits, Plaintiffs have made a compelling showing the rights of Georgia citizens to select their leaders under the process established by the Georgia Legislature were violated. Indeed, they have committed election frauds and illegalities that violated Georgia laws intended to establish and maintain “the legality and purity of elections,” including O.C.G.A. §§ 21-2-31, 21-2-33.1, Article 10 of Chapter 2 of Title 21 of the Georgia Code pertaining to

absentee voting, including particularly the absentee ballot processing and signature match requirements of O.C.G.A. § 21-2-386, and Part 5 of Article 11 of Chapter 5 of Title 21 of the Georgia Code pertaining to voting by Optical Scanning Voting Equipment. These acts also violated the Equal Protection Clause of the United States Constitution.

The tally of ballots certified by Defendants giving Vice President Biden a 12,670 vote margin cannot possibly stand in light of the thousands of illegal mail-in ballots that were improperly counted and the vote manipulation caused by the Dominion software and the lack of election law procedure.

Plaintiffs' equal protection claim is straightforward. The right of qualified citizens to vote in a state election involving federal candidates is recognized as a fundamental right under the Fourteenth Amendment of the United States Constitution. *See Reynolds v. Sims*, 377 U.S. 533, 554 (1964) (The Fourteenth Amendment protects "the right of all qualified citizens to vote, in state as well as in federal elections."). Indeed, ever since the *Slaughter-House Cases*, 83 U.S. 36 (1873), the United States Supreme Court has held that the Privileges or Immunities Clause of the Fourteenth Amendment protects certain rights of federal citizenship from state interference, including the right of citizens to directly elect members of Congress. *See Twining v. New Jersey*, 211 U.S. 78, 97 (1908) (*citing Ex parte*

Yarbrough, 110 U.S. 651, 663-64 (1884)); *see also Oregon v. Mitchell*, 400 U.S. 112, 148-49 (1970) (Douglas, J., concurring) (collecting cases).

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

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

“Every voter in a federal ... election, whether he votes for a candidate with little chance of winning or for one with little chance of losing, has a right under the Constitution to have his vote fairly counted, without its being distorted by fraudulently cast votes.” *Anderson v. United States*, 417 U.S. 211, 227 (1974); *see*

also *Baker v. Carr*, 369 U.S. 186, 208 (1962). Invalid or fraudulent votes “debase[]” and “dilute” the weight of each validly cast vote. *Id.* at 227.

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

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

States may not, by arbitrary action or other unreasonable impairment, burden a citizen’s right to vote. *See Baker v. Carr*, 369 U.S. 186, 208 (1962) (“A citizen’s right to a vote free of arbitrary impairment by state action has been judicially recognized as a right secured by the Constitution”). “Having once granted the right to vote on equal terms, the state may not, by later arbitrary and disparate treatment,

value one person's vote over that of another." *Bush v. Gore*, 531 U.S. 98, 104-05 (2000). Among other things, "specific rules designed to ensure uniform treatment" in order to prevent "arbitrary and disparate treatment of voters" are required. *Id.* at 106-07; *see also Dunn v. Bloomstein*, 405 U.S. 330, 336 (1972) (providing that each citizen "has a constitutionally protected right to participate in elections on an equal basis with other citizens in the jurisdiction").

Additionally, as candidates for election, Plaintiffs seek redress under Georgia law, O.C.G.A. § 21-2-522, which provides:

A result of a primary or election may be contested on one or more of the following grounds:

- (1) Misconduct, fraud, or irregularity by any primary or election official or officials sufficient to change or place in doubt the result;
- (2) When the defendant is ineligible for the nomination or office in dispute;
- (3) When illegal votes have been received or legal votes rejected at the polls sufficient to change or place in doubt the result;
- (4) For any error in counting the votes or declaring the result of the primary or election, if such error would change the result; or
- (5) For any other cause which shows that another was the person legally nominated, elected, or eligible to compete in a run-off primary or election.

As set forth above, all of the conditions in these subsections, except for subsection (2) which is not applicable, support the relief Plaintiffs seek.

Accordingly, Plaintiffs have established a likelihood of success on the

merits.

2. THE PLAINTIFFS WILL SUFFER IRREPARABLE HARM.

“It is well-settled that an infringement on the fundamental right to vote amounts to an irreparable injury.” *New Ga. Project v. Raffensperger*, 2020 U.S. Dist. LEXIS 155901, at 86, (N.D. Ga. Aug. 31, 2020). The irreparable nature of the harm to Plaintiffs is apparent. If the Georgia count was defective, including defective absentee ballots and illegal out of state voters in an amount sufficient to place the outcome in doubt, then Georgia’s election results are improper and suspect, resulting in Georgia’s electoral college votes going to Democrats, including Vice President Biden, contrary to the votes of the majority of Georgia’s qualified electors. Consequently, Plaintiffs will be directly and irreparably harmed by the wrongful denial of their right to cast their votes in the Electoral College for President Trump.

3. WEIGHING HARM TO THE OPPOSING PARTY AND THE PUBLIC INTEREST.

The remaining two factors for the preliminary injunction test, “harm to the opposing party and weighing the public interest, merge when the Government is the opposing party.” *Nken v. Holder*, 556 U.S. 418, 129 S. Ct. 1749, 1753 (2009).

The Eleventh Circuit recently addressed a claim related to Georgia’s voting system in *Common Cause Georgia v. Kemp*, 347 F. Supp. 3d 1270 (11th Cir. 2018).

The Court found,

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

Id. at 1294-1295.

First, an immediate temporary restraining order is necessary to preserve the forensic data on the voting machines, which may get “wiped” as this motion is filed.

Second, while it is true that invalidating the results of an election in which millions of people have cast valid votes is a momentous decision, it must be recognized that there is no legitimate harm to the opposing party or any legitimate public interest in enforcing the results of an election decided by illegally cast ballots – a point made indisputably clear by the availability of election invalidation as a remedy in Georgia’s election contest statutes.

Plaintiffs are entitled to an order de-certifying Georgia’s election results or a stay in the delivery of the certified results to the Electoral College to preserve the status quo while this case proceeds. The Plaintiffs are further entitled to an order making the voting machines available for forensic analysis before they are reset for

the machine recount, and other equitable relief, on an emergency basis, due to the irreparable harm and impending Electors' vote.

The low costs to Defendants and high potential harm to Plaintiffs make this a case with a substantial net harm that an immediate and emergent injunctive relief can prevent. Therefore, it is respectfully requested that the Court grant Plaintiffs' Motion. A proposed form of Order is attached.

Respectfully submitted, this 27th day of November 2020.

/s Sidney Powell*
Sidney Powell PC
Texas Bar No. 16209700

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Dallas, Texas 75219
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*Application for admission pro hac vice
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*Application for admission pro hac vice
forthcoming

Attorneys for Plaintiffs

FONT CERTIFICATE

The undersigned certifies that the foregoing document was prepared in 14-point Times New Roman font and in accordance with the margin and other requirements of Local Rule 5.1.

s/ Harry W. MacDougald
Harry W. MacDougald
Georgia Bar No. 463076

CERTIFICATE OF SERVICE

This is to certify that I have on this day e-filed the foregoing document with the Clerk of Court using the CM/ECF system, and that I have delivered the filing to the Defendants by email and FedEx at the following addresses:

This 27th day of November, 2020.

Governor Brian Kemp
206 Washington Street
111 State Capitol
Atlanta, GA 30334

Secretary of State Brad Raffensperger
214 State Capitol
Atlanta, Georgia 30334
brad@sos.ga.gov
soscontact@sos.ga.gov

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200 Piedmont Avenue SE
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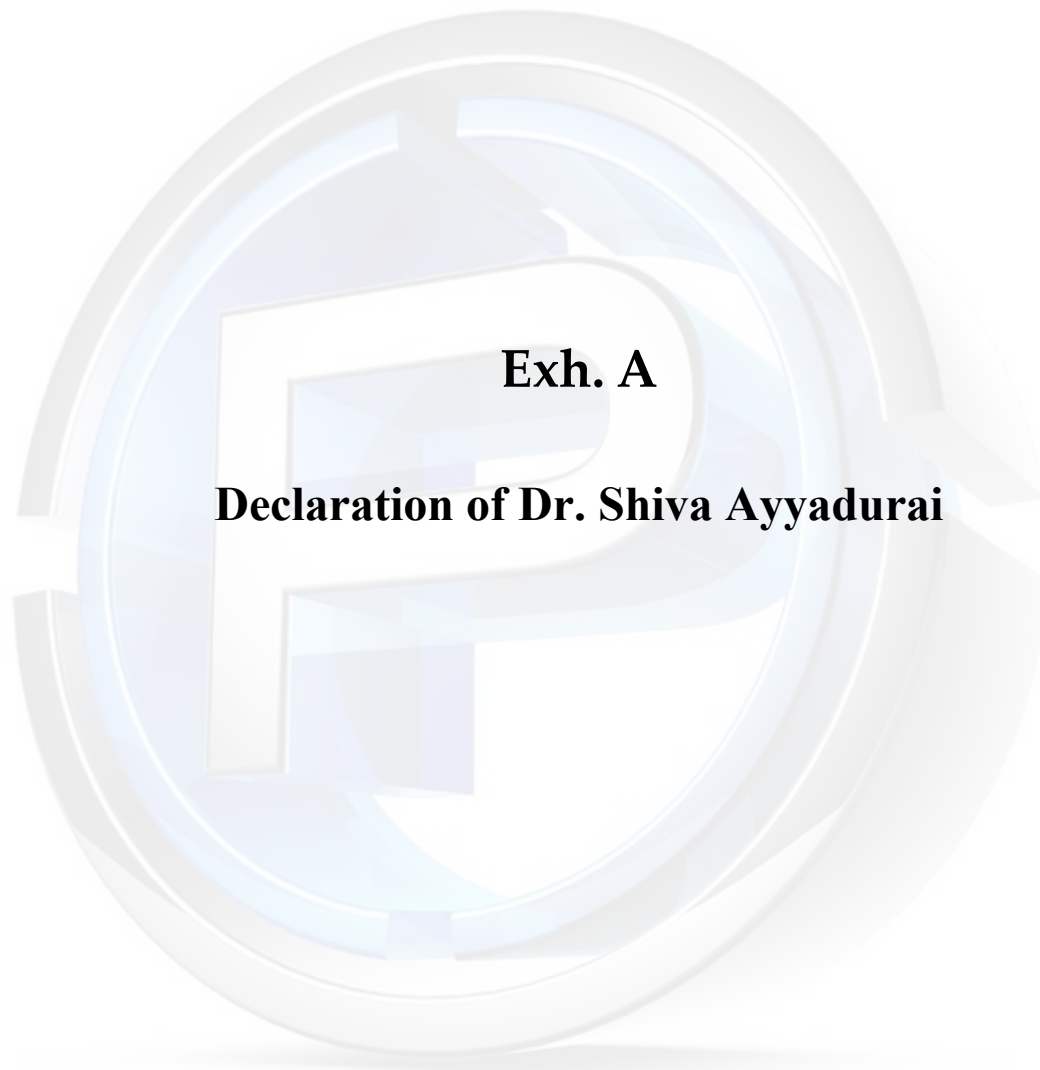
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s/ Harry W. MacDougald
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Exh. A

Declaration of Dr. Shiva Ayyadurai

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DECLARATON OF SHIVA AYYADURAI, PHD

I, Dr. Shiva Ayyadurai, hereby submit this Declaration, under the penalty and pains of perjury that the following is true and correct:

1. I am over the age of 18 years and competent to testify herein.
2. I am an engineer with vast experience in engineering systems, pattern recognition, mathematical and computational modeling and analysis. My Curriculum Vitae (CV) is attached to this Declaration.
3. Recently I had cause to analyze the flow of electronic votes between the candidates in the 2020 Presidential election held in the States of Arizona, Michigan, and Georgia.
4. Paper ballots are marked by voters to document selection. Voters, based on a precinct, may use touch-screen equipment, which records their vote digitally without any paper involved.
5. Digital scanners scan paper ballots and create an electronic image of the paper ballot. This raw image file is called *the ballot image* and is an electronic file with an assigned file name. This raw file is held within the scanning machine and is used to tabulate the vote count.
6. During tabulation, ballot images are analyzed to generate the Cast Vote Record (CVR) that contains the counts of the ballots cast.
7. When the machine exports the ballot images, it may be exported as raw files or converted into a different file format as determined by the Election Management System used.

Formats such as PDF, TIF, PNG, and PBM are examples of popular image formats.

8. Crucially, the file names could be changed making it difficult to ascertain the link between and the CVR. This makes examination of the original file names mandatory to confirm the link with the actual voters.
9. These ballot image files are imported into the higher jurisdiction's Election Management System from any and all voting system scanners or imaging components (for example: poll-site based, absentee count board-based, central-based) used at the local precinct level, including polling place scanners, and high-speed or other centrally-based scanners used for absentee vote counting.
10. The Cast Vote Record is usually maintained in XLSX, CSV, XML, or JSON formats. This makes it easy to import them into spreadsheets.
11. The List of Vote Records (LVR), also called the Vote Cast Log, Cast Ballot Log, or other designation, is a record or set of records that consists of a spreadsheet, with each row displaying contents of one ballot, or contents of one Cast Vote Record (CVR). This record may consist of more than one file. (For clarity, here is a sample page of this record obtained from Hillsborough County, Florida, which may be viewed at this link: <https://tinyurl.com/y2yl3hbp>).
12. When votes are tabulated, it is the electronic ballot image that is evaluated by the tabulation software. This makes the electronic ballot image *the actual ballot used* to count the vote. The paper ballot is merely stored physically by elections officials to serve as the audit trail backup record. Thus, no conclusions about the accuracy of the electronic vote count may be made without access to the actual raw ballot images used to tabulate the vote. Naturally, the electronically tabulated vote count must be identical to the paper ballot hand count in order for election integrity to be established. It is thus mandatory to

gain access to the raw ballot images and tabulate a vote count using those very images when the final tally is in dispute.

13. When votes are tabulated, it is the electronic ballot image that is evaluated by the tabulation software. This makes the electronic ballot image *the actual ballot used* to count the vote. The paper ballot is merely stored physically by elections officials to serve as the audit trail backup record. Thus, no conclusions about the accuracy of the electronic vote count may be made without access to the actual raw ballot images used to tabulate the vote. Naturally, the electronically tabulated vote count must be identical to the paper ballot hand count in order for election integrity to be established. It is thus mandatory to gain access to the raw ballot images and tabulate a vote count using those very images when the final tally is in dispute.

MATHEMATICAL ANALYSES OF ELECTRONIC DATA
FROM GEORGIA REVEALS MASSIVE ANOMALIES IN REPUBLICAN VOTING
PATTERNS AND ETHNIC DISTRIBUTION OF VOTES

14. I had cause to perform mathematical analyses of actual voting data from six counties in the State of Georgia. Screenshots follow documenting the results. I shall explain each graph as we proceed.

15. Analysis of Chatham County – Republican Voting Pattern and Ethnic Demographics

a. The Party Demographics of the County is as follows:

- Republican: 39.9%
- Democrat: 58.7%

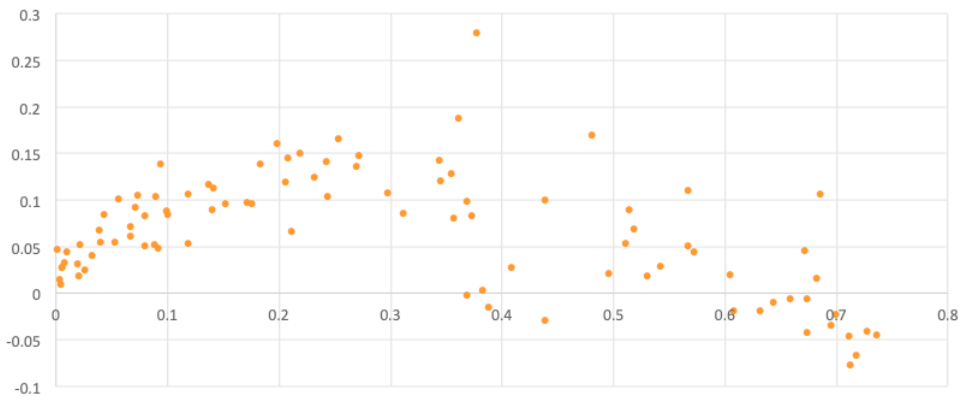
- Independent: 1.4%

b. The Ethnic Demographics of the County is as follows:

- 49% White
- 37% Black
- 2.5 % Hispanic
- 1.5% Asian
- 8% Unspecified
- 2% Other

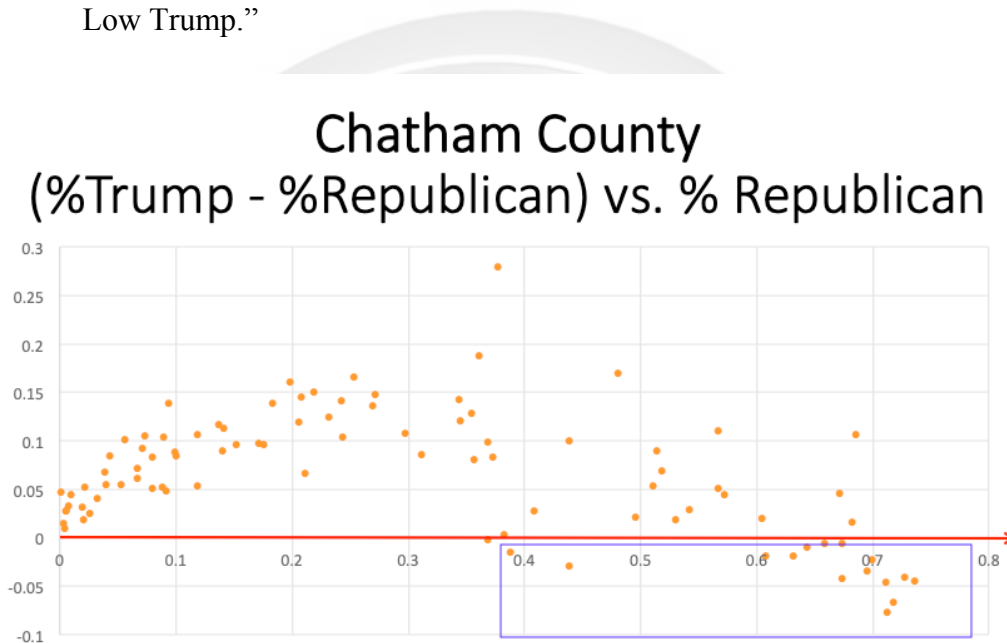
c. Now follows a graph that shows that as the percentage of Republicans in precincts increases, President Trump gets fewer votes. Each dot on the graph represents a single precinct with the County. The x-axis is the percentage of Republicans in a precinct represented in decimal numbers. The y-axis is a measure of the difference in the percentage of voters who voted for President Trump in that precinct and the percentage of Republicans in that precinct.

Chatham County
(%Trump - %Republican) vs. % Republican



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- d. The graph below with the red arrow at the zero line serves to highlight the precincts, indicated within the blue box that apparently is “High Republican, But Low Trump.”

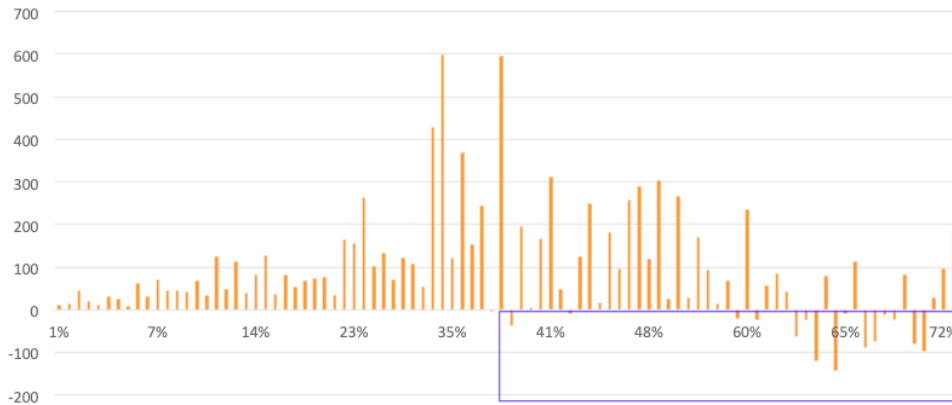


- e. The graph below plots on the x-axis the percentage of Republicans in a precinct, and on the y-axis the difference in the actual number of votes between what President Trump received and the number of votes he would have received had Republicans in that precinct voted for him. This graph again shows that President Trump apparently lost votes in the same pattern as above - “High Republican, But Low Trump.”

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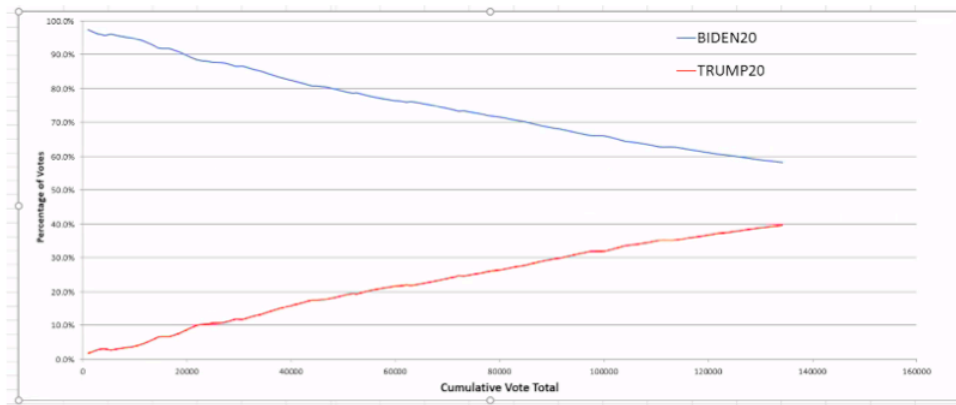
Chatham County (Trump Actual Votes – Projected Republican Votes) vs. Republican Precincts



f. The graph below plots the actual number of votes, reported by the Secretary of State of Georgia for the County, as received by Mr. Biden (in blue) and President Trump (in red) as the number of votes accumulates from small to large on the x-axis. The end points on the right are the final number of votes received by Mr. Biden and President Trump as reported by the Secretary of State.

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Chatham County Actual Votes – Biden and Trump

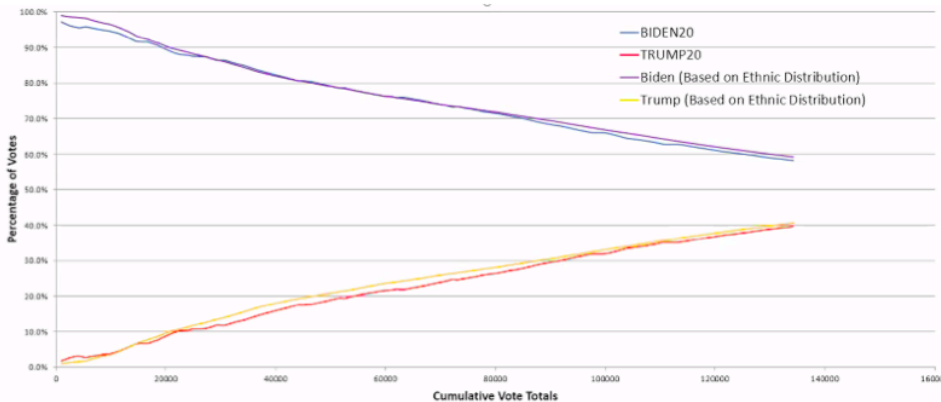


- g. The graph below contains two new lines: one in purple, and one in yellow. The line in purple plots the number of votes for Mr. Biden based on the ethnic demographic distribution that matches the pattern of actual votes reported by the Secretary of State reported for Mr. Biden (in blue). The line in yellow plots the number of votes for President Trump based on the same ethnic demographic distribution to match the pattern of actual votes reported by the Secretary of State reported for President Trump (in red).

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Chatham County Analysis of Votes Based on Ethnic Distribution



h. The above analysis reveals that although the percentage of Whites and Blacks in the County are 49% and 37%, respectively, the only plausible way to explain the results, reported by the Secretary of State, is if President Trump did not receive one single Black vote, and the demographic distribution of votes between Mr. Biden and President Trump was as follows:

- **Demographic distribution analysis of Actual Vote Results**

	White	Black
Biden	30%	100%
Trump	70%	0%

16. Analysis of Fulton County - Republican Voting Pattern and Ethnic Demographics

a. The Party Demographics of the County is as follows:

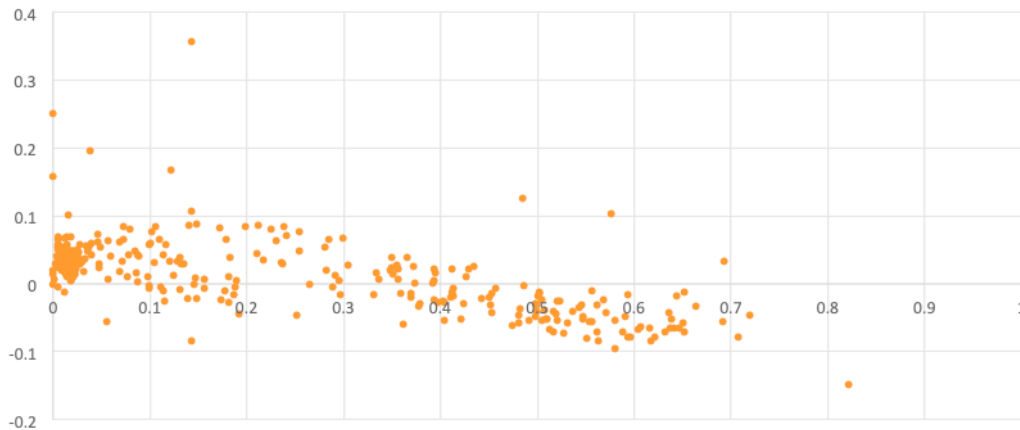
- Republican: 26.3%
- Democrat: 72.5%
- Independent: 1.2%

b. The Ethnic Demographics of the County is as follows:

- White: 38%
- Black: 42%
- Hispanic: 3%
- Asian: 3%
- Unspecified: 12%
- Other: 2%

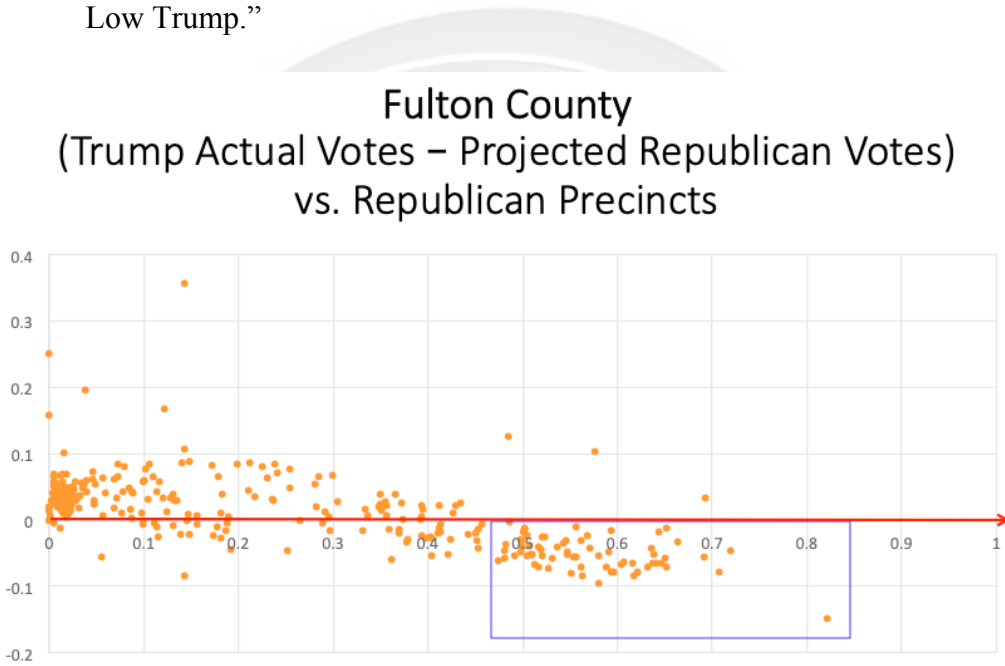
c. Now follows a graph that shows that as the percentage of Republicans in precincts increases, President Trump gets fewer votes. Each dot on the graph represents a single precinct with the County. The x-axis is the percentage of Republicans in a precinct represented in decimal numbers. The y-axis is a measure of the difference in the percentage of voters who voted for President Trump in that precinct and the percentage of Republicans in that precinct.

Fulton County
(Trump Actual Votes – Projected Republican Votes)
vs. Republican Precincts



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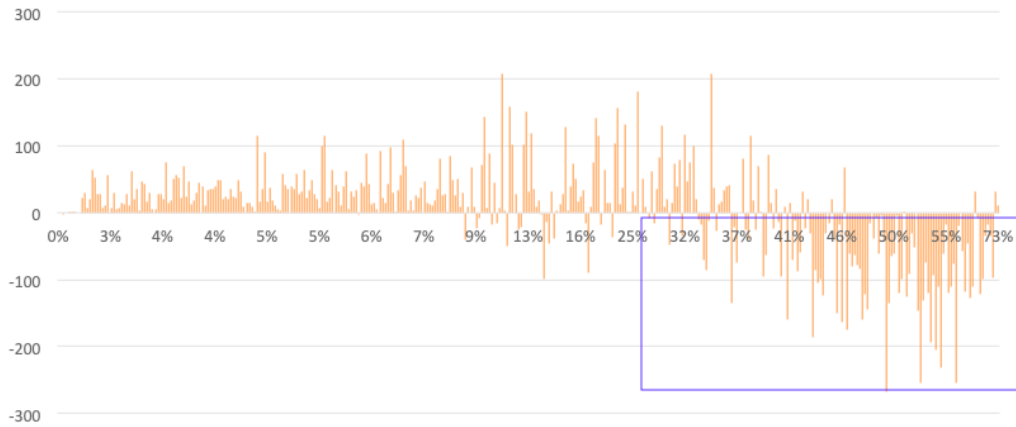
- d. The graph below with the red arrow at the zero line serves to highlight the precincts, indicated within the blue box that apparently is “High Republican, But Low Trump.”



- e. The graph below plots on the x-axis the percentage of Republicans in a precinct, and on the y-axis the difference in the actual number of votes between what President Trump received and the number of votes he would have received had Republicans in that precinct voted for him. This graph again shows that President Trump apparently lost votes in the same pattern as above - “High Republican, But Low Trump.”

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Fulton County (Trump Actual Votes – Projected Republican Votes) vs. Republican Precincts

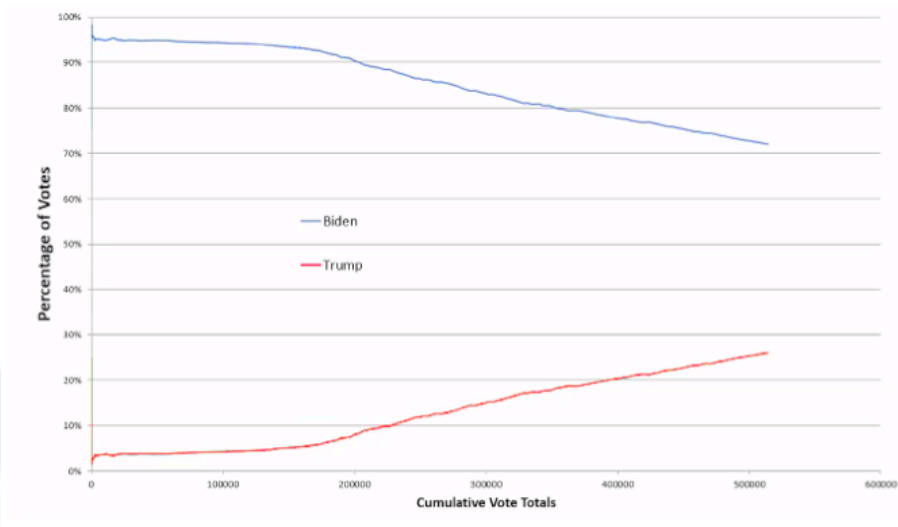


- f. The graph below plots the actual number of votes, reported by the Secretary of State of Georgia for the County, as received by Mr. Biden (in blue) and President Trump (in red) as the number of votes accumulates from small to large on the x-axis. The end points on the right are the final number of votes received by Mr. Biden and President Trump as reported by the Secretary of State.

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Fulton County Actual Votes – Biden and Trump

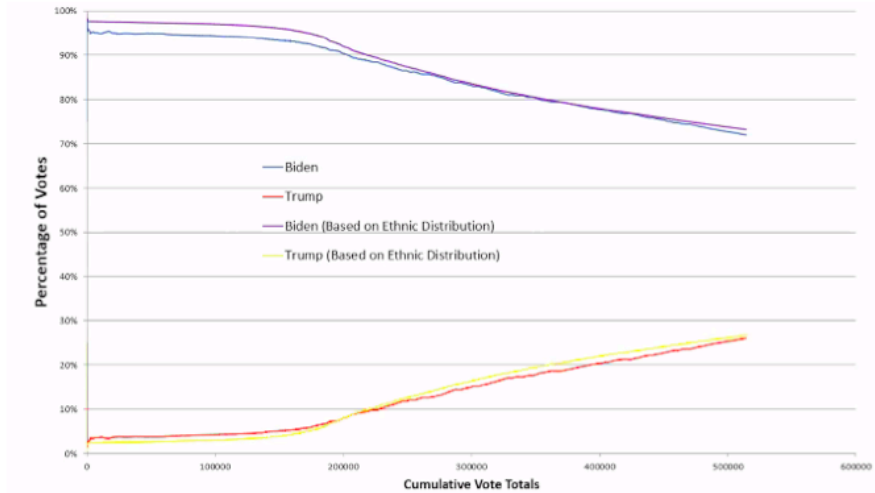


- g. The graph below contains two new lines: one in purple, and one in yellow. The line in purple plots the number of votes for Mr. Biden based on the ethnic demographic distribution that matches the pattern of actual votes reported by the Secretary of State reported for Mr. Biden (in blue). The line in yellow plots the number of votes for President Trump based on the same ethnic demographic distribution to match the pattern of actual votes reported by the Secretary of State reported for President Trump (in red).

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Fulton County Analysis of Votes Based on Ethnic Distribution



h. The above analysis reveals that although the percentage of Whites and Blacks in the County are 38% and 42%, respectively, the only plausible way to explain the results, reported by the Secretary of State, is if President Trump received only 2% of the Black vote, and the demographic distribution of votes between Mr. Biden and President Trump was as follows:

- Demographic distribution analysis of Actual Vote Results

	White	Black
Biden	46%	98%
Trump	54%	2%

17. Analysis of Cobb County - Republican Voting Pattern and Ethnic Demographics

a. The Party Demographics of the County is as follows:

- Republican: 56.3%
- Democrat: 42.1%
- Independent: 1.6%

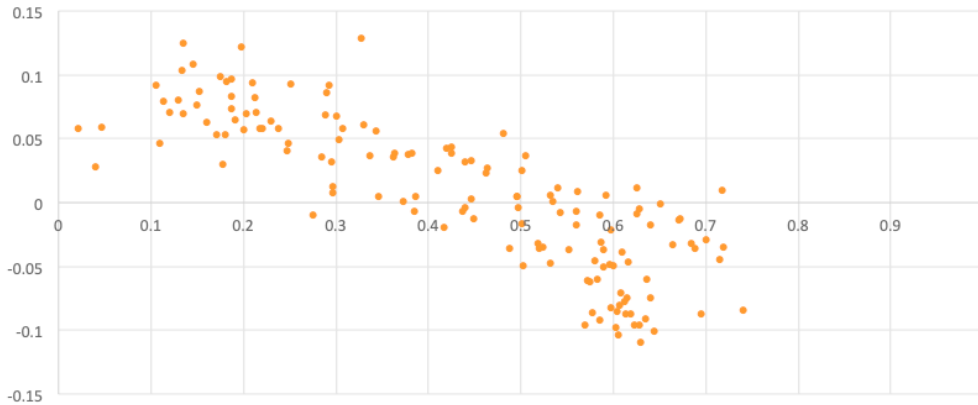
b. The Ethnic Demographics of the County is as follows:

- White: 54%
- Black: 26%
- Hispanic: 6%
- Asian: 3%
- Unspecified: 7%
- Other: 3%

c. Now follows a graph that shows that as the percentage of Republicans in precincts increases, President Trump gets fewer votes. Each dot on the graph represents a single precinct with the County. The x-axis is the percentage of Republicans in a precinct represented in decimal numbers. The y-axis is a measure of the difference in the percentage of voters who voted for President Trump in that precinct and the percentage of Republicans in that precinct.

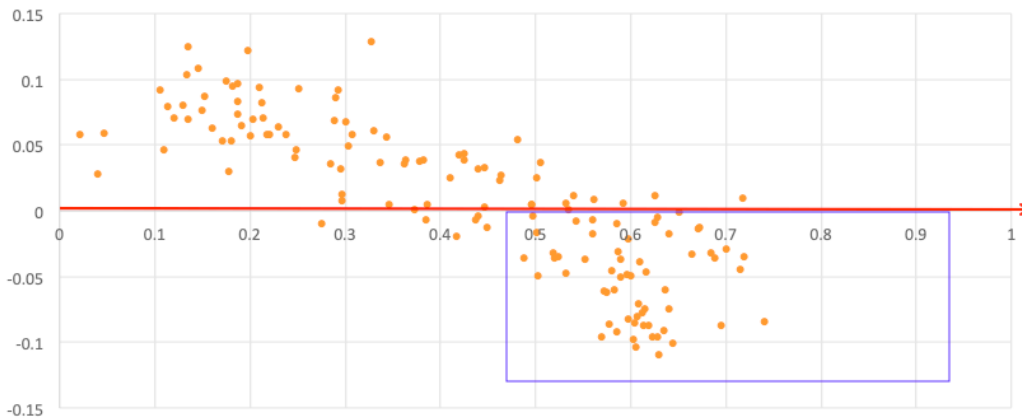
pete santilli
ThePeteSantilliShow.com

Cobb County (%Trump - %Republican) vs. % Republican



- d. The graph below with the red arrow at the zero line serves to highlight the precincts, indicated within the blue box that apparently is “High Republican, But Low Trump.”

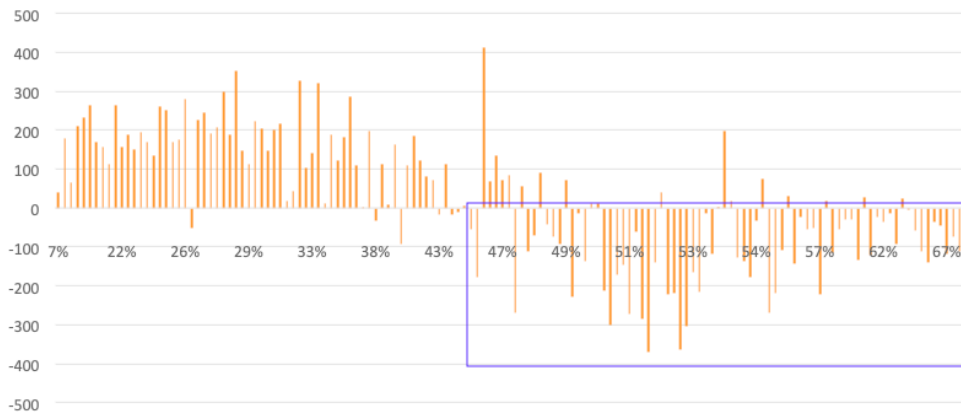
Cobb County (%Trump - %Republican) vs. % Republican



- e. The graph below plots on the x-axis the percentage of Republicans in a precinct, and on the y-axis the difference in the actual number of votes between what

President Trump received and the number of votes he would have received had Republicans in that precinct voted for him. This graph again shows that President Trump apparently lost votes in the same pattern as above - “High Republican, But Low Trump.”

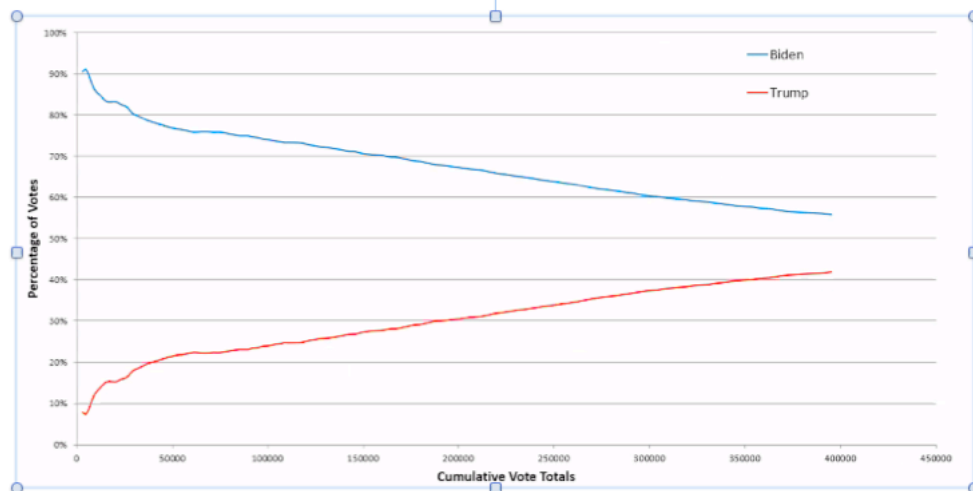
Cobb County
 (Trump Actual Votes – Projected Republican Votes)
 vs. Republican Precincts



- f. The graph below plots the actual number of votes, reported by the Secretary of State of Georgia for the County, as received by Mr. Biden (in blue) and President Trump (in red) as the number of votes accumulates from small to large on the x-axis. The end points on the right are the final number of votes received by Mr. Biden and President Trump as reported by the Secretary of State.

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Cobb County Actual Votes – Biden and Trump

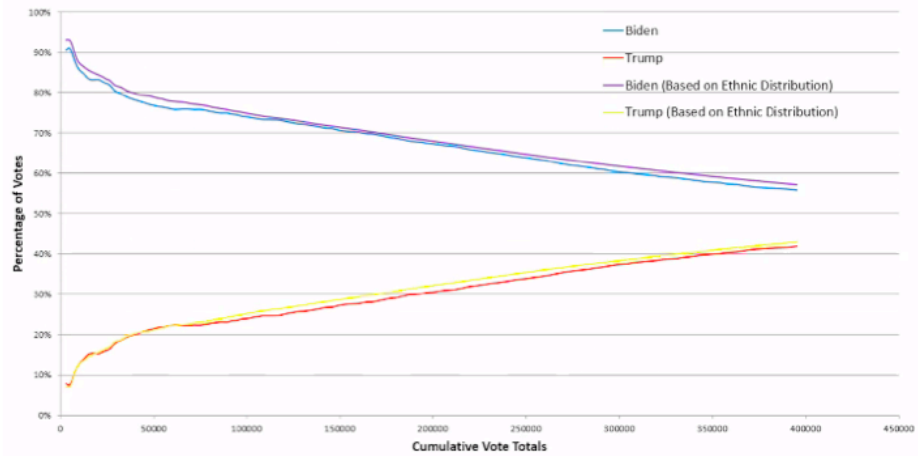


- g. The graph below contains two new lines: one in purple, and one in yellow. The line in purple plots the number of votes for Mr. Biden based on the ethnic demographic distribution that matches the pattern of actual votes reported by the Secretary of State reported for Mr. Biden (in blue). The line in yellow plots the number of votes for President Trump based on the same ethnic demographic distribution to match the pattern of actual votes reported by the Secretary of State reported for President Trump (in red).

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Cobb County Analysis of Votes Based on Ethnic Distribution



h. The above analysis reveals that although the percentage of Whites and Blacks in the County are 54% and 26%, respectively, the only plausible way to explain the results, reported by the Secretary of State, is if President Trump received not one single Black vote, and the demographic distribution of votes between Mr. Biden and President Trump was as follows:

- **Demographic distribution analysis of Actual Vote Results**

	White	Black
Biden	29%	100%
Trump	71%	0%

18. Analysis of Forsyth County - Republican Voting Pattern

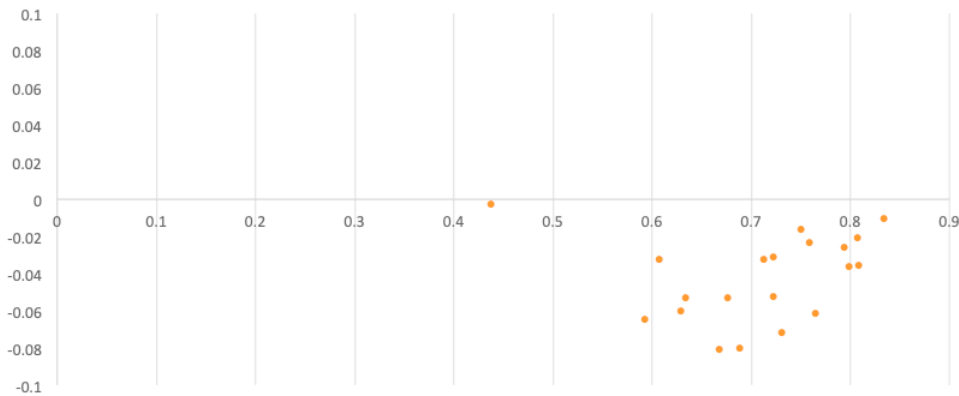
a. The Party Demographics of the County is as follows:

- Republican: 65.8%

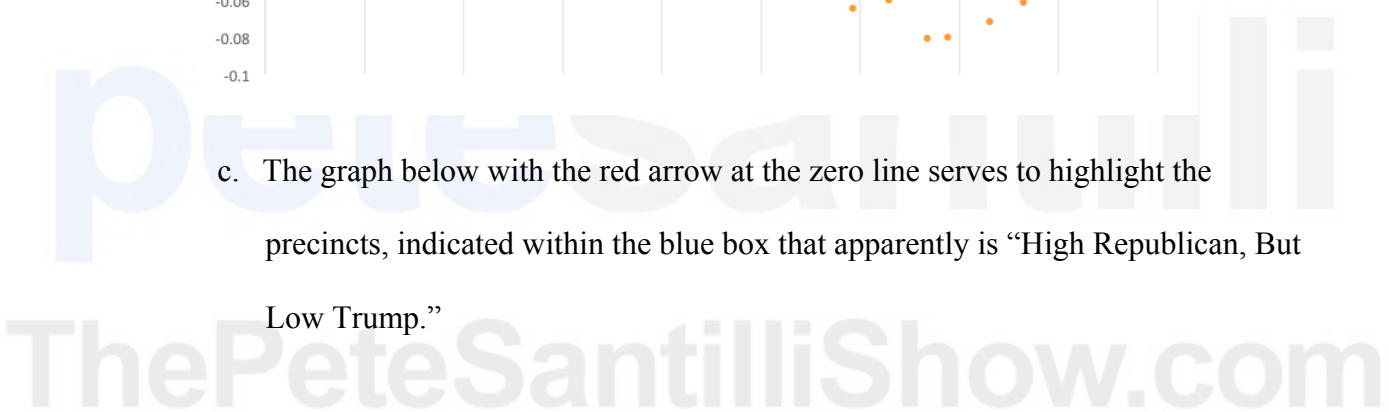
- Democrat: 32.6%
- Independent: 1.6%

b. Now follows a graph that shows that as the percentage of Republicans in precincts increases, President Trump gets fewer votes. Each dot on the graph represents a single precinct with the County. The x-axis is the percentage of Republicans in a precinct represented in decimal numbers. The y-axis is a measure of the difference in the percentage of voters who voted for President Trump in that precinct and the percentage of Republicans in that precinct.

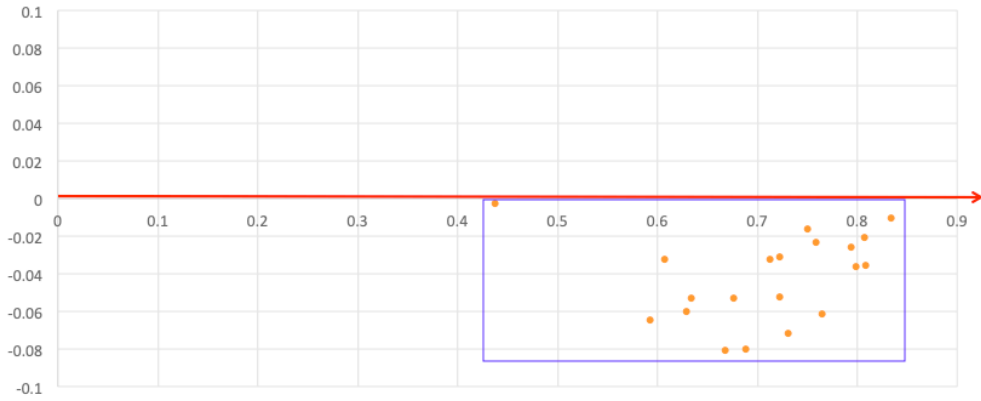
Forsyth County
 (%Trump - %Republican) vs. % Republican



c. The graph below with the red arrow at the zero line serves to highlight the precincts, indicated within the blue box that apparently is “High Republican, But Low Trump.”



Forsyth County (%Trump - %Republican) vs. % Republican

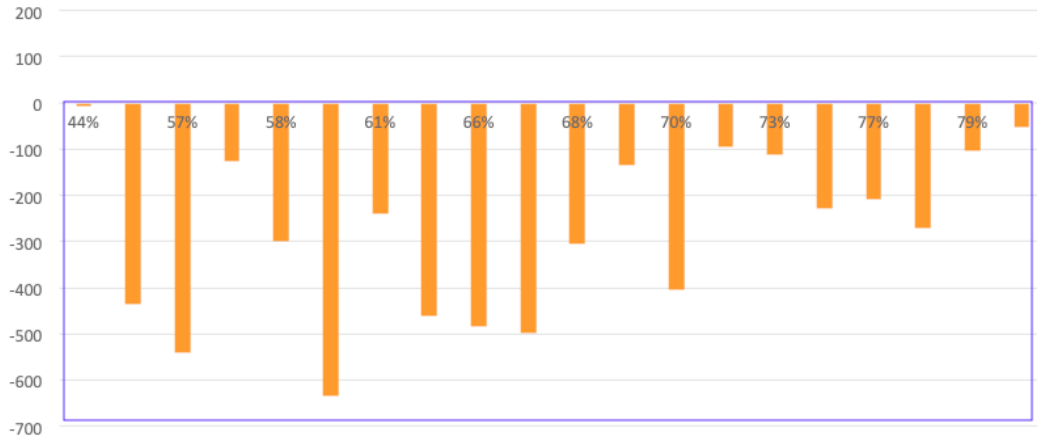


- d. The graph below plots on the x-axis the percentage of Republicans in a precinct, and on the y-axis the difference in the actual number of votes between what President Trump received and the number of votes he would have received had Republicans in that precinct voted for him. This graph again shows that President Trump apparently lost votes in the same pattern as above - “High Republican, But Low Trump.”

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Forsyth County (Trump Actual Votes – Projected Republican Votes) vs. Republican Precincts

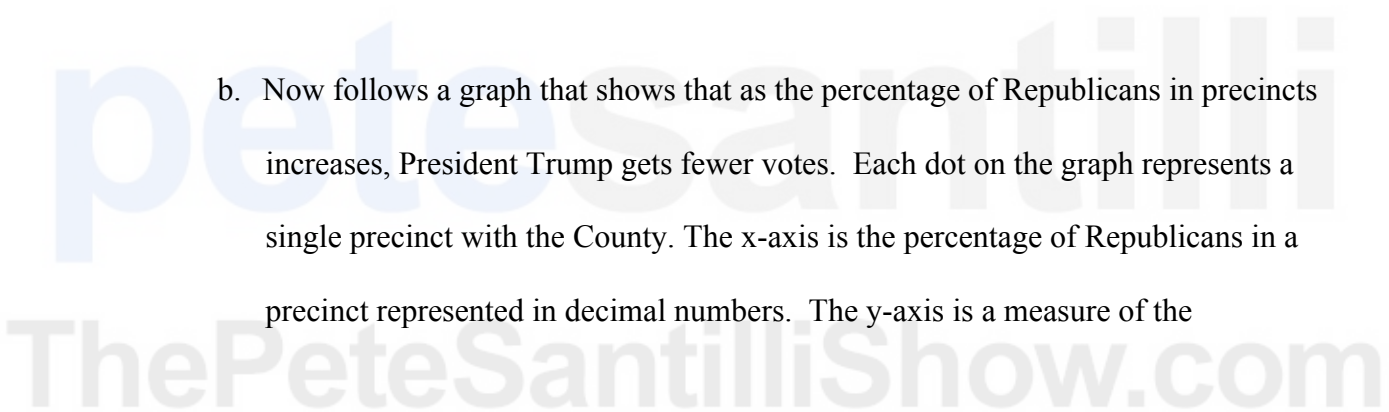


19. Analysis of Cherokee County - Republican Voting Pattern

a. The Party Demographics of the County is as follows:

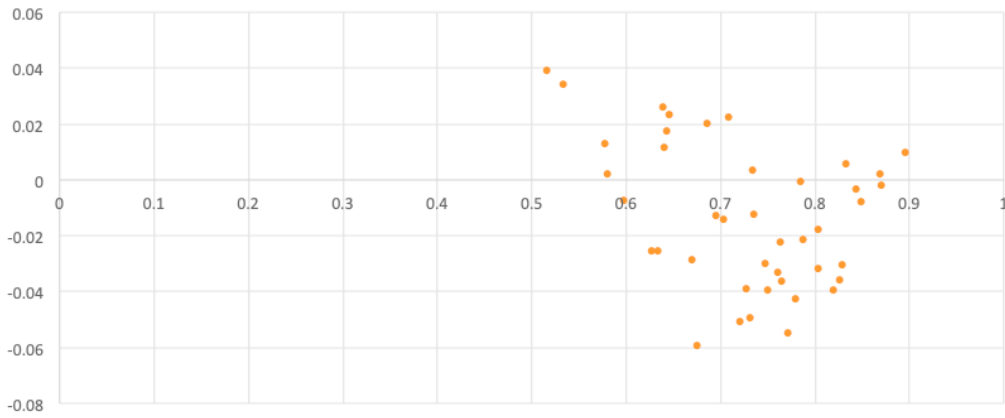
- Republican: 68.8%
- Democrat: 29.5%
- Independent: 1.7%

b. Now follows a graph that shows that as the percentage of Republicans in precincts increases, President Trump gets fewer votes. Each dot on the graph represents a single precinct with the County. The x-axis is the percentage of Republicans in a precinct represented in decimal numbers. The y-axis is a measure of the



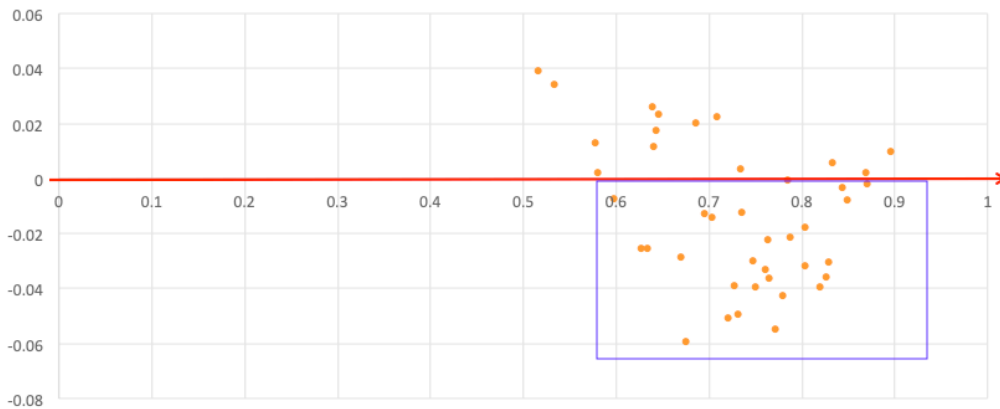
difference in the percentage of voters who voted for President Trump in that precinct and the percentage of Republicans in that precinct.

Cherokee County (Trump Actual Votes – Projected Republican Votes) vs. Republican Precincts



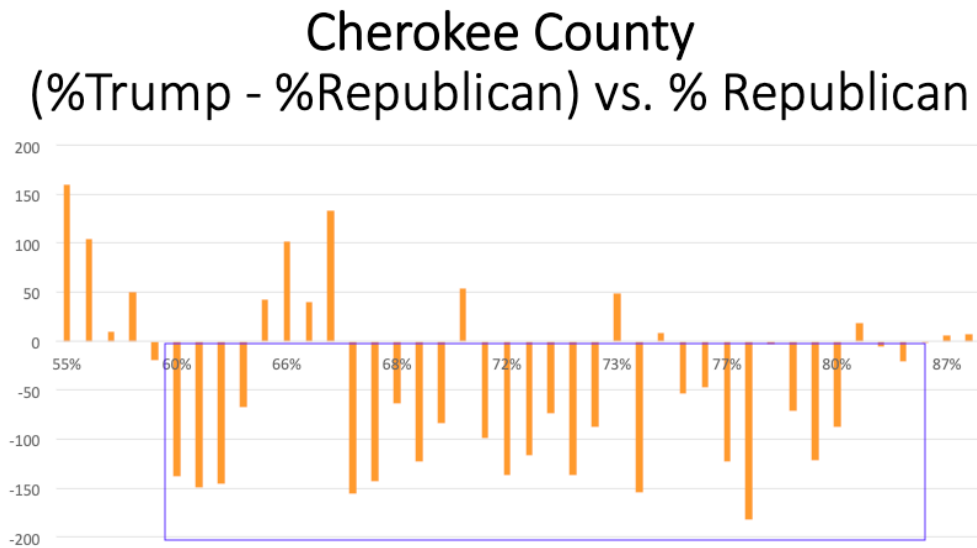
- c. The graph below with the red arrow at the zero line serves to highlight the precincts, indicated within the blue box that apparently is “High Republican, But Low Trump.”

Cherokee County (Trump Actual Votes – Projected Republican Votes) vs. Republican Precincts



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- d. The graph below plots on the x-axis the percentage of Republicans in a precinct, and on the y-axis the difference in the actual number of votes between what President Trump received and the number of votes he would have received had Republicans in that precinct voted for him. This graph again shows that President Trump apparently lost votes in the same pattern as above - “High Republican, But Low Trump.”

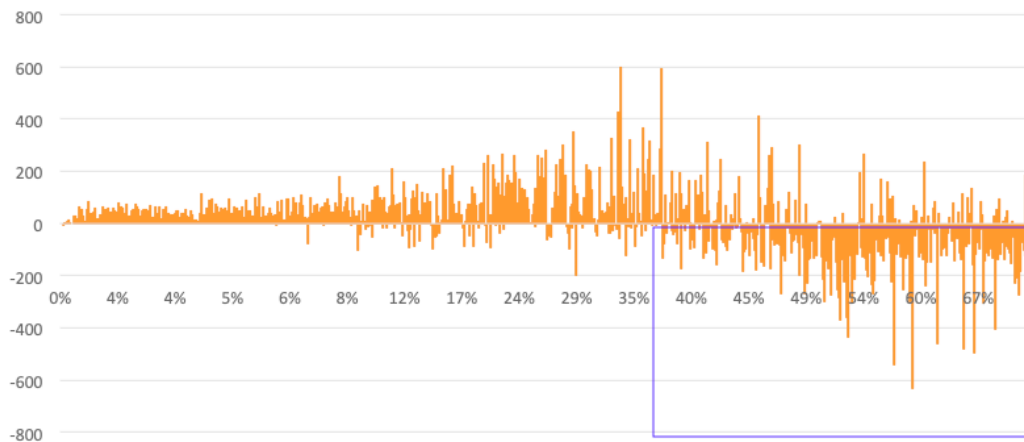


20. Compound Analysis of Six Counties - Republican Voting Pattern

- a. **“High Republican, But Low Trump”** - The graph below is compound analysis of the Republican voting pattern in six counties: Fulton, Cobb, DeKalb, Cherokee, Chatham, Forsyth. The graph plots on the x-axis the percentage of Republicans in a precinct, and on the y-axis the difference in the actual number of votes between what President Trump received and the number of votes he would have received had Republicans in that precinct voted for him. This graph again

shows that President Trump apparently lost votes in the same pattern as above -
 “High Republican, But Low Trump.”

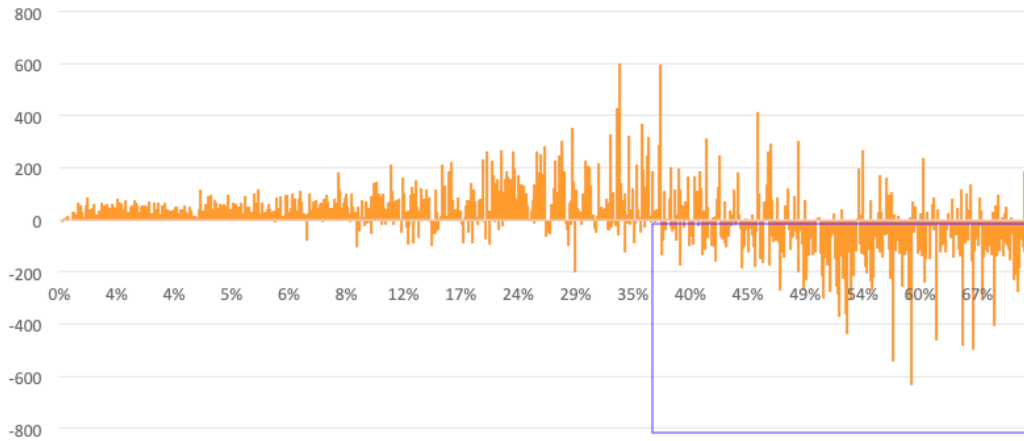
Compound Analysis of Six Counties: Fulton, Cobb, DeKalb, Chatham, Cherokee, Forsyth
 (Trump Actual Votes – Projected Republican Votes)
 vs. Republican Precincts



21. Compound Analysis of Six Counties - Republican Voting Pattern

- a. **“High Republican, But Low Trump”** - The graph below is compound analysis of the Republican voting pattern in six counties: Fulton, Cobb, DeKalb, Cherokee, Chatham, Forsyth. The graph plots on the x-axis the percentage of Republicans in a precinct, and on the y-axis the difference in the actual number of votes between what President Trump received and the number of votes he would have received had Republicans in that precinct voted for him. This graph again shows that President Trump apparently lost votes in the same pattern as above - “High Republican, But Low Trump.”

Compound Analysis of Six Counties: Fulton, Cobb, DeKalb, Chatham, Cherokee, Forsyth
(Trump Actual Votes – Projected Republican Votes)
vs. Republican Precincts

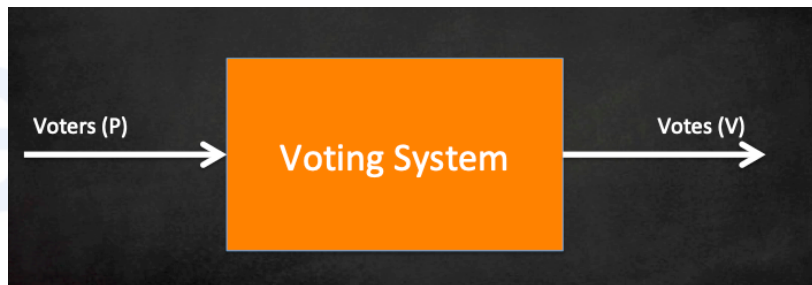


DISCOVERY OF ALGORITHM USED TO ALLOCATE VOTES FROM PRESIDENT TRUMP TO MR. BIDEN – I.E. ELECTION FRAUD

22. It is assumed in the United States of America, we have “One Person, One Vote.”

However, with the use of electronic voting systems, this is not guaranteed.

23. Consider the diagram below, if P number of voters, vote, we expect V number of votes.



24. In the above diagram, P is equal to the number of registered Republicans PLUS the number registered Democrats PLUS the number of those unregistered in either party –

“Independents” – PLUS the number of those in other parties (i.e. Libertarian, Green, etc.).

25. In the above diagram, V is equal to the number of votes cast for the Republican candidate i.e. President Trump PLUS the number of votes cast for the Democrat candidate i.e. Mr. Biden PLUS the number of votes cast for the other party candidates i.e. Jo Jorgensen PLUS the number of write-in votes PLUS the number of undervotes (blank votes) PLUS the number of overvotes (voting for both candidates).

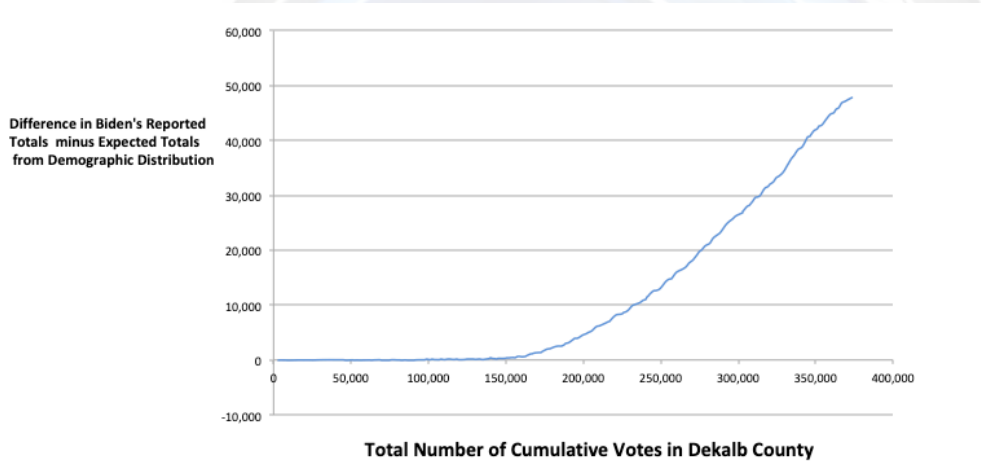
26. Most of us believe that P will equal V assuming that what goes into the Voting System, as illustrated in the above diagram, will not be manipulated in any manner; however, it is documented in the technical manuals of electronic voting machine software that a “weighted race” feature exists to multiply a voter’s vote by a “weight” – a decimal value - that can be less than 1 or greater than 1. Moreover, documentation exists to show that the vote counts are stored as decimal values, not as integers.

27. The existence of the “weighted race” feature provides a mechanism to employ an algorithm so, “One Person, DOES NOT Equal One Vote.” This means P will equal V if and only if the weights equal 1 (“one”); otherwise, the assumption P equals V is false.

28. In the analysis of DeKalb County, using data provided by the Secretary of State of Georgia, there is unequivocal evidence of an algorithm that has been put in place such that when a precinct nears approximately ten-percent (“10%”) in White voters, a linearly increasing percentage of total votes is transferred from President Trump to Mr. Biden.

29. DeKalb County has approximately 31% White voters, and 52% Black voters.

30. The graph below plots on the x-axis the number of cumulative votes as reported by the Secretary of State of Georgia. As we move from left to right on the x-axis, the percentage of white voters in each precinct increases. The y-axis plots the difference between Mr. Biden’s votes as reported by the Secretary of State of Georgia and what he should have received based on the ethnic distribution of DeKalb County.



31. The above graph indicates as the percentage of white voters increases beyond approximately ten-percent (10%), at a total vote count of approximately 150,000 votes, a mathematical algorithm comes into play, to transfer a weighted factor of total votes from President Trump to Mr. Biden in a very specific – un-natural, machine-like manner.

Based on the current data, that weight factor appears to be approximately 1.22.

32. Using the weight factor of 1.22, approximately 48,000 votes were transferred to Mr. Biden to DeKalb County alone.

CONCLUSION

This Declaration has presented, in multiple counties in Georgia, a consistent pattern of “High Republican, Low Trump” vote pattern anomalies that are improbable. In addition, it was

discovered that when ethnic distributions were applied to three (3) counties, the only plausible explanation for the vote distribution was that President Trump received near zero Black votes, which is also highly improbable.

Analysis of DeKalb County enabled the discovery of a “weighted race” algorithm that transferred, using a “weight” of 1.22, approximately 48,000 votes from President Trump to Mr. Biden. In DeKalb County, 373,000 votes were cast. The approximate 48,000 votes transferred to Mr. Biden represents approximately 13% of the total votes cast in DeKalb County.

When one considers the entire State of Georgia, the number of votes cast in DeKalb county represents a mere 7.5% of the total number of votes cast in the entire State of Georgia, which was reported by the Secretary of State of Georgia to be 4,998,482 votes.

The analysis herein reveals the number of voters may likely not equal of the number of votes given algorithms were in place to manipulate the tabulation of votes. This result demands that ballot images, log files, CVR, and electronic data files from each precinct be reviewed to validate the integrity of the election in Georgia. Until that time, the election results are unverifiable.

Respectfully submitted under the pains and penalties of perjury,

November 25, 2020

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Shiva Ayyadurai, Ph.D.

Education

INSTITUTION AND LOCATION DEGREE YEAR FIELD OF STUDY

MIT, Department of Biological Engineering Ph.D. 2007 Systems Biology
MIT, Department of Mechanical Engineering S.M.M.E. 1990 Applied Mechanics
MIT Media Laboratory, Department of Architecture S.M.V.S. 1989 Scientific Visualization
MIT, Department of Electrical Engineering and Computer Science S.B.E.E. 1986 Operating Systems

Industry & Entrepreneurial Experience

2010-Present Founder, Chairman & CEO, Chief Scientist, CytoSolve, Inc.
2009 Additional-Secretary, Indian Government & CEO, CSIR-Tech, India
2004-Present Board Member, EchoMail, Inc., Enterprise Email Management
2004-Present Founder and Managing Director, General Interactive, LLC, Venture Incubator
1998-2004 Founder, President & CEO, EchoMail, Inc., Enterprise Email Management
1994-1998 Founder, President & CEO, Millennium Productions, Inc., Software & Media Production
1990-1994 Director of Advanced Products, Dataware Technologies, Inc., CD-ROM Search Software,
1986-1990 Senior Engineer, Graphics Software, IBM/Lotus Development Corporation
1984-1986 Senior Engineer, Information Resources, Inc., Marketing Analytics
1983-1984 Consulting Software Engineer, Chase, Inc., Hydrodynamics Software,
1982-1984 Research Engineer, HP Medical Systems, Operating System for Cardiologist Workstation,
1982-1983 Consulting Software Engineer, MIT Civil Engineering, Intelligent Signal Processing,
1981-1982 Consulting Software Engineer, Number Nine, Inc., Advanced Graphics Hardware,

Academic Teaching Experience

2010–Present Lecturer, Systems Thinking Workshops, Systems Health, LLC
2010-2013 Lecturer, Systems Visualization, MIT Comparative Media Studies
2007-2012 Lecturer, MIT Biological Engineering Department
2007 Lecturer, Biological Pathway Design and Implementation, SMA 2007 Boot Camp
2006 Lecturer, Biological Pathway Design and Implementation, SMA 2006 Boot Camp
2006 Teaching Assistant, Control Systems and Dynamics, 2.14, MIT Mechanical Engineering
1994-2004 Industry Expert, “Dr. E-Mail”, Lectures Worldwide, Global 2000 Companies
1992-1994 Lecturer, Information Technology I, MIT Sloan School of Management
1990 Teaching Assistant, Dynamics, 2.03, MIT Department of Mechanical Engineering.
1988 Lecturer, Physics, MITES Program,
1987 Teaching Assistant, Computer Graphics, 4.971, MIT Media Laboratory
1986 Teaching Assistant, Measurements Laboratory, 2.671, MIT Mechanical Engineering
1985 Teaching Assistant, Being There, MIT Humanities Department
1984 Tutor, Circuits and Electronics, 6.002, MIT Electrical Engineering and Computer Science
1983 Tutor, Structures & Programming, 6.001, MIT Electrical Engineering & Computer Science
1982 Lecturer, IAP Course on Indian Art History, MIT Humanities Department

Academic Research Experience

2009-Present Director, International Center for Integrative Systems, Educational & Research Foundation
2013-2014 Visiting Scientist, Sociotechnical Systems Rsrch Ctr., Engineering Systems Division, MIT
2010-2011 Director, MIT Media & Organizational Biomimetics, Comparative Media Studies, MIT
2009 Scientist Level H, Council of Scientific and Industrial Research, New Delhi, India
2007-2009 Fulbright Scholar, Systems Biology-Traditional Medicines, US-India Fulbright Program
2004-2007 Research Associate, MIT Biological Engineering, Computational Systems Biology
1996-2004 Chief Scientist, EchoMail, Inc., Large Scale Architectures for Message Analysis
1992-1996 Chief Technology Officer, Information Cybernetics, Inc., Document Analysis & Modeling
1990-1992 Research Team Leader, Sloan School of Mgmt, Offline Handwriting Recognition, MIT
1988-1990 Graduate Research Assistant, MIT NDE Lab, Wave Propagation Analysis and Modeling
1986-1988 Graduate Research Fellow, MIT Media Laboratory, Automated Graphic Design System
1984-1986 UROP Research, Particle Analysis in Fluidized Bed Reactors, Langer Laboratory, MIT
1983-1984 UROP Research, Cryogenic Embryo Preservation, Health Sciences and Tech., MIT
1982 UROP Research, History of India's Caste System, Prof. Noam Chomsky, MIT
1981-1983 UROP Research, Tadoma and Speech Recognition, Research Lab for Electronics, MIT
1978-1983 Research Associate, Sleep Pattern Analysis, Biomedical Engineering, UMDNJ
1978-1984 Research Fellow, Email System, Laboratory for Computer Science, UMDNJ

Political & Activism Experience

Republican Candidate for U.S. Senate 2020 from Massachusetts

Running for U.S. Senate to represent MA in 2020

Independent Candidate for U.S. Senate 2018 from Massachusetts

Garnered a historic ~100,000 votes running aggressive ground campaign in MA. Number of votes was

five times greater than any other Independent candidate in MA history.

Industry Publications

Dr. Shiva Ayyadurai is the author of over 200 hundred confidential industry publications, white papers

and studies performed in the fields of email technologies and systems biology for global 2000 companies.

The titles of those publications are available upon request. 1992 – Present.

Selected Academic Publications

S. Ayyadurai, P. Deonikar, Modulation of Neural Signaling by Tetrahydrocannabinol (THC), Food

Chemistry, Submitted for Publication, June 2019.

S. Ayyadurai, M. Hansen, J. Fagan, P. Deonikar, *In-Silico* Analysis & *In-Vivo* Results Concur on

Glutathione Depletion in Glyphosate Resistant GMO Soy: Advancing a Systems Biology Framework for Safety Assessment of GMOs, *American Journal of Plant Sciences*, Vol. 7, No. 12, August 19, 2016.

M. Sweeney, S. Ayyadurai, B.V. Zlokovic, Pericytes of the neurovascular unit: key functions and signaling pathways, *Nature Neuroscience*, Vol. 19, No. 6, 771-83, May, 2016.

S. Ayyadurai, P. Deonikar, Do GMOs Accumulate Formaldehyde and Disrupt Molecular Systems Equilibria? Systems Biology May Provide Answers, *Agricultural Sciences*, Vol. 6, No. 7, July 10, 2015.

S. Kothandaram, P. Deonikar, M. Mohan, V. Venugopal, S. Ayyadurai, *In-Silico* Modeling of C1 Metabolism, *American Journal of Plant Sciences*, Vol. 6, No. 9, June 17, 2015.

S. Ayyadurai, The Control Systems Engineering Foundation of Traditional Indian Medicine: the Rosetta Stone for Siddha and Ayurveda, *Systems of Systems Engineering*, Vol. 5, No. 2, 125-149, June, 2014.

A. Koo, S. Ayyadurai, D. Nordsletten, R. Umeton, B. Yankama, S. Ayyadurai, G. García-Cardeña, C. Forbes Dewey Jr., *In Silico* Modeling of Shear-stress-induced Nitric Oxide Production in Endothelial Cells through Systems Biology, *Cell Biophysical Journal*, Volume 104, Issue 10, 2295-2306, May 21, 2013.

S. Ayyadurai, S. Abraham, T. Zawacki, International Small Business Commerce (ISBC): Potential Source of New Revenue for the United States Postal Service, U.S. Postal Service Office of Inspector General, February 15, 2013.

S. Ayyadurai, D. Sparks, L.P. Michelson, S. Abraham, Email Management & Potential Opportunities for United States Postal Service, U.S. Postal Service Office of Inspector General, August 24, 2012.

S. Ayyadurai, D. A. Nordsletten, B. Yankama, R. Umeton, C. F. Dewey Jr., Multi-scale Mathematical Modeling to Support Drug Development, *Proceedings of Biomedical Engineering Society (BMES)*, Hartford, CT, October 12-15, 2011.

S. Ayyadurai, C.F. Dewey, Jr., CytoSolve: A Scalable Computational Method for Dynamic Integration of Multiple Molecular Pathway Models, *Biological Engineering Division*, MIT, Cambridge, MA, June 28, 2011.

S. Ayyadurai, Biomimetics of Communication and Media, 12th International Research Symposium on Service Excellence in Management, Ithaca, NY, June 2-5, 2011.

S. Ayyadurai, C.F. Dewey, Jr., A Distributed Computational Architecture for Integrating Multiple

Biomolecular Pathways, Biological Engineering Division, MIT, Cambridge, MA, March 9, 2011.

S. Ayyadurai, Services-Based Systems Architecture for Modeling the Whole Cell: A Distributed Collaborative Engineering Systems Approach, Communications in Medical and Care Compunetics, Springer Publications, 16 November 2010.

S. Ayyadurai, B. Yankama, R. Umeton, C. F. Dewey Jr., Editing and Aligning Complex Molecular Pathways Using 3D Models, Proceedings of Biomedical Engineering Society (BMES), Austin, TX, October 6-9, 2010.

S. Ayyadurai, Commentary: Innovation Demands Freedom, Nature India, December, 2009.

S. Ayyadurai, Modeling the Cell, Proceedings of BIO-IT Conference, In Silicon Modeling Section, Boston, MA, April 2009.

S. Ayyadurai, Integration of Siddha with Systems Biology, Proceedings of Fullbright Conference 2009, Kolkata, India, March 2009.

S. Ayyadurai, Eva Sciacca, C. Forbes Dewey, Jr., A Web Based Tool for Integration of Molecular Pathway Models, Proceedings of BioInformatics and BioEngineering, 8th IEEE International Conference, 8-10 Oct. 2008.

S. Ayyadurai, Mission of Systems Biology, Bio-IT Beyond Genome Conference Proceedings, June 2008.

S. Ayyadurai, C.F. Dewey, Jr., Scaleable methods for large molecular pathway calculations: application to EGFR, In Biomedical Engineering Society Annual Fall Meeting, Los Angeles, September 2007.

K. R. Stiehl, K. Dang, S. Ayyadurai, B.-S Seah, S. S. Bhowmick, C. Forbes Dewey, Jr., A New Approach to Database Creation Using Ontologies: OWLdb. K. Dang, K. R. Stiehl, S. Ayyadurai, B.-S Seah, S. S. Bhowmick, C. F. Dewey, Jr., An Information Architecture to Support Molecular Pathway

S. Ayyadurai, C.F. Dewey, Jr., Integrating an Ensemble of Biochemical Network Models, In International Society of Computational Biology (ISCB 2007), Vienna, July 2007.

S. Ayyadurai, Cytosolve, In proceedings of the Singapore MIT Symposium for Computational and Systems Biology, January 2007.

S. Ayyadurai, Integrating Biological Pathway Models, In MIT CSBi Oktoberfest Proceedings, Cambridge, October, 2006

S. Ayyadurai, C. Forbes Dewey, Jr., C. Tan, Distributed Computing of Complex Collections of Biological Pathways, In World Congress on Medical Physics and Biomedical Engineering (WC 2006), Seoul, August-September 2006.

S. Ayyadurai, C. F. Dewey, Jr., J. Bassingthwaighte, J. Butterworth, P. Villiger, P. Hunter, Normalization

of Biological Pathways, In World Congress on Medical Physics and Biomedical Engineering (WC

2006), Seoul, August-September 2006.

S. Ayyadurai, C.F. Dewey, Jr., Cytosolve: A Distributed Computational Architecture for the Integration of

Biomolecular Pathways, In Biomedical Engineering Society Annual Meeting, Chicago, September

2006.

C. F. Dewey, Jr., S. Ayyadurai, V. Rouilly, C. L. Poh, S. S. Bhowmick, J. Evans, R. I. Kitney, Footprints in

the Sand: Supporting External Analysis of Medical and Biological Databases, In World Congress on

Medical Physics and Biomecal Engineering (WC 2006), Seoul, August-Sept 2006.

S. Ayyadurai, Modeling Actin Polymerization as a System of Integrated Biomolecular Pathways, In

Proceedings of the Annual MIT CSBi Oktoberfest, October 2005.

S. Ayyadurai, C.F. Dewey, Jr., Computing unsteady phenomenon across multiple molecular pathways,

In Biomedical Engineering Society Annual Meeting, Washington, D.C., September 2005.

S. Ayyadurai, S. A. Cimaszewski, J. H. Williams, Jr.: Unsupervised Classification of Fiber Composite

Interphases, In Proceedings of the Second International Conference on Acusto-Electronics, The American

Society of Nondestructive Testing, June 24-25, 1993.

A. Gupta, M. V. Nagendraprasad, A. Liu, Patrick Shen-Pei Wang, S. Ayyadurai: An Integrated Architecture for Recognition of Totally Unconstrained Handwritten Numerals, In International

Journal of

Pattern Recognition and Artificial Intelligence, Vol. 7, No. 4, pp. 757-773, 1993.

G. V. Novakovic, L. E. Freed, S. Ayyadurai, H. Bernstein, Robert S. Langer and C. L. Cooney, Fluid-

Dynamic Study of the Enzymatic Fluidized Bed Reactor for Blood Dehparinization, Fluidization VI, In

Proceedings of the International Fluidization Conference, Banff, Canada, May 1989.

S. Laxminarayan, O. Mills, L. Rajaram, S. Ayyadurai, L.P. Michelson, Sleep Stage and Apnea Pattern

Analysis, In Proceedings of the International Conference on Medical and Biological Engineering, Espoo,

Finland, August 1985.

Books

The Climate of Science

August 2019

The Future of Email: What We Must Do to Protect Ourselves

A review of email's origin and where email is going including opportunities and dangers.

Publisher: General Interactive, Cambridge, 2016

Systems Health

A three-volume set that is the text book for the Systems Health® course.

Publisher: General Interactive, Cambridge, 2016

The Science of Everything

An integration of eastern medicine & western systems theory to reveal the “science of everything.”

Publisher: General Interactive, Cambridge, 2016

Your Body, Your System

How to achieve health and well-being by treating the body as a complex system of systems.

Publisher: General Interactive, Cambridge, 2016

The System and Revolution

Provides an accessible guide to power of systems thinking and how it can revolutionize everything.

Publisher: General Interactive, Cambridge, 2015

The EMAIL Revolution: Unleashing the Power to Connect

Provides the history of email and how modern AI is advancing email across major organizations: small

and large.

Publisher: Skyhorse & Penguin, New York, 2013

The Internet Publicity Guide: How to Maximize your Marketing and Promotion in Cyberspace

Educational guide for online retailers on how to build sales through the emerging online medium.

Publisher: Allworth Press, New York, 1997

Arts and The Internet: A Guide to the Revolution

A guide to educate artists on the power of the Internet for new forms of art and distribution.

Publisher: Allworth Press, New York, 1996

Honors and Awards

“Star” Scientist in Feature Documentary *Poisoning Paradise*

Poisoning Paradise winner of multiple film awards, 2019

Inventor of Email Honor by Government of Argentina

Invited by the Government of Argentina, Tucuman Province and the University of Technology

National to give lectures on innovation, June, 2019

Clinical Research Summit 2019

Distinguished Lecture Award, March, 2019

State of the Art Lecture Award

American Society for Clinical Pharmacology and Therapeutics, 2017

MIT Presidential Fellows Distinguished Lecture

Selected to give annual MIT Presidential Fellows Lecture, September 2017

#1 Reviewer’s Choice for The Future of Email Book

Midwest Book Review: Small Press Bookwatch, 2017

Email @33: Inventor of Email Honoring

Digital India Foundation, September 2015

Serial Entrepreneur of the Year

Entrepreneur Magazine, 2015

Nominated National Medal of Technology and Innovation (NMTI)

US Patent and Trademark Office, September 2014

Livingston Hall of Fame

Livingston Educational Foundation (LEF), June 2014

ASSIST World Records Research Foundation Honorary Award

ASSIST World Records Research Foundation, Puducherry, India July 2013

Honorary Doctorate

Vinayaka Missions University, Salem, India July 2013

SKP Lifetime Achievement Award for Science and Technology

SKP Engineering College, Tiruvannamallai, India July 2013

Sri Sakthi Institute of Technology Lifetime Achievement Award

Sri Sakthi Institute of Technology, Coimbatore, **India July 2013**

The Smithsonian's National Museum of American History Acceptance of EMAIL papers, artifacts

National Museum of American History, The Smithsonian Institution, Washington D.C, February 16, 2012

The Man Who Invented Email

Time Magazine, November, 2011

First Outstanding Scientist and Technologist of Indian Origin (STIO/H)

Council of Scientific and Industrial Research (CSIR), India, 2009

Fulbright Scholar

US Fulbright, Washington, DC, 2008-2009

Travel Fellowship Award

ISMB 2007, Vienna, Austria, 2007

Fulbright Scholar

US Fulbright, Washington, DC, 2007

Graduate Research Fellowship

SMA Graduate Research Fellowship, 2004-2007

Communications Solutions™ Product of the Year Award

EchoMail RMOS Product Suite, November, 2003

Customer Interactive Solutions, TMC Labs Innovation Award

EchoMail Customer Care, September, 2002

Massachusetts Interactive Media Council Award (MIMC)

Customer Support Applications, EchoMail CC/BI (Finalist) 2002

Silver Pencil Award, Integrated Branding

Wieden & Kennedy/EchoMail, cK one E-Mail Campaign, 2001

Lotus Beacon Award

EchoMail RMOS Product Suite, 2000

Best of Class Internet Commerce Expo

Customer Service & Fulfillment, EchoMail CC, 1999

Massachusetts Interactive Media Council Award (MIMC)

Groupware/Collaborative Website (Finalist) World Music , 1998

Massachusetts Interactive Media Council Award (MIMC)

Non-Profit/Public Service Online, AccessExpressed.org Online Community (Finalist), 1998

Who's Who in America

Since 1997

IBM/Lotus Beacon Award

Best Messaging Solution, EchoMail Suite, 1997

Massachusetts Interactive Media Council Award

Best E-Mail/ Fax Application, EchoMail suite, 1997

Discover Magazine Award for Technical Innovation

XIVATM Core Technology, 1996

Lemelson-MIT Award for Innovation

XIVATM Core Technology (Finalist), 1996

Verizon (formerly GTE/BBN) Technologies Award

ProVision Award, Interactive Marketing Creative Direction, 1996

PCWeek's Web Site of the Week

Harvard-Square.com Online Community, 1996

Best of Europe Online

Arts-Online.com Online Community, 1996

Yahoo! #1 What's Cool

Harvard-Square.com Online Community, 1996

IBM Best Online Community

Harvard-Square.com Online Community, 1996

DISNEY EPCOT Center Award for Exhibit

Selected to be in Innoventions Exhibit, 1996

First Place, Competition for Automatic Categorization of Electronic Mail

Office of the President, White House, Washington, DC, November, 1994.

Winner, Automatic Categorization of SGML Tagged Documents

Information Handling Services (IHS), Boulder, CO, 1993.

International Fellowship Research Grant, Research in the Cross-Language Translators

Sloan School of Management and Industrial Liaison Program and the Italian Trade Commission, MIT,

Cambridge, MA, 1992.

Elected Session Chairman, Session on Scientific Visualization

International IEEE EMBS Conference, Institute of Electrical and Electronics Engineers (IEEE), Philadelphia, PA, 1991

Founder and Organizer, Session on Scientific Visualization

International IEEE EMBS Conference, Institute of Electrical and Electronics Engineers (IEEE), Seattle, WA, 1990.

Full Member, SIGMA XI

Since 1989

SIGMA XI UROP Award for Outstanding Undergraduate Research

1985

MIT Mennen Scholar

1982-1986

Tau Beta Pi

1984.

ETA KAPPA NU

1984

VI-A Hewlett-Packard COOP Assignment

Biomedical Division, Andover, MA 1983

MIT Varsity Soccer

1982

Awarded Westinghouse Science Talent Search Award

1981

Thomas Alva Edison/Max McGraw Finalist

1981

Accepted to American Legion Jersey Boys State Program

1981

Outstanding Statesman Award, American Legion Jersey Boys State

1981

All-County Soccer Champions

Essex County, New Jersey, 1981

Individual First Place in Advanced Mathematics at New Jersey State Mathematics

Competition

1981

Accepted to Gifted Students Program

New York University Program in Computer Science at Courant Institute of Mathematical Sciences for

gifted students in Eighth Grade of Junior High School, 1977

Patents

Patent No. 6,668,281, V.A. Shiva Ayyadurai, "Relationship management system and method using

asynchronous electronic messaging", April 6, 2004.

Patent No. 6,718,368, V.A. Shiva Ayyadurai, "System and method for content-sensitive automatic reply

message generation for text-based asynchronous communications", April 6, 2004.

Patent No. 6,718,367, V.A. Shiva Ayyadurai, "Filter for modeling system and method for handling and

routing of text-based asynchronous communications", April 6, 2004.

Research and Thesis Supervision

Ceryen Tan, **MIT UROP Project**, Biological Engineering, **Title:** SBML API Programming for Biological

Systems Integration, 2005.

Steven A. Cimaszewski, **MIT Masters Thesis**, Mechanical Engineering, **Title:** Statistical Analysis of Fiber

Composite Interphase Inverse Problem, 1994.

Peter L. Sparks, **MIT Bachelors Thesis**, Electrical Engineering, **Title:** A Hybrid Method for Segmenting

Numeric Character Strings, 1991.

Matthew J. Labrador, **MIT Bachelors Thesis**, Electrical Engineering, **Title:** The Generalized Mass-Spring

Lattice Model with Damping : A Lagrangian Dynamics Approach, 1990.

Professional Societies

TIE, Charter Member

Tau Beta Pi, Lifetime Member

Sigma Xi, Full Member

Eta Kappa Nu, Member

Oxford-Cambridge Society, Member

The Indus Entrepreneur (TIE), Charter Member
Biomedical Engineering Society (BMES), Student Member

Skills

Programming Languages

C++, C, Java, HTML, ASP

Foreign Languages

Spanish, Italian, Tamil, Hindi

General Skills

Problem Solving, Writing, Teaching and Lecturing, Fundraising, Research, Proposal Development,
Software Architecture, Design and Development, User Interface Design, Mathematical Modeling,
Organizational and Business Development, Crisis Management, Mentoring and Career Development,
Negotiations

Invited Lectures (selected ones)

Associatoin of Systems Pharmacologists

Karunya University, National Level Symposium

Address: Inventions and Innovations for Sustainable Development
Coimbatore, India March 2014

Hindustan Educational Institutions

Address: Innovate to Lead
Coimbatore, India March 2014

Indian Institute of Technology, Mumbai

Address: Innovation Anytime, Anyplace by Anybody
Mumbai, India March 2014

Indian Institute of Technology, Delhi

Address: Innovation Anytime, Anyplace by Anybody
New Delhi, India March 2014

Penguin Publication Book Tour

Address: The EMAIL Revolution
India, March 12 to March 25, 2014

Chopra Center: Journey to Healing

Address: Systems Health
San Diego, CA March 2014

Sages and Scientists

Address: Systems and Revolution
San Diego, CA August 2013

MIT Conversations on Sociotechnical Systems

Address: Rethinking Narrative and Systems of Innovation: Innovation Anytime, Anyplace by Anybody
MIT, Cambridge, MA October 2013

Chopra Center: Journey to Health

Address: Systems Health
San Diego, CA August 2013

Hindustan University

Address: Innovation Anytime, Anyplace by Anybody
Chennai, India July 2013

Velammal Vidyalaya

Address: Innovation Anytime, Anyplace by Anybody
Chennai, India July 2013

SCAD Engineering College

Address: Innovation Anytime, Anyplace by Anybody
Tirunelveli District, India July 2013

PSR Engineering College

Address: Innovation Anytime, Anyplace by Anybody
Sivakasi, India July 2013

Kalasalingam University

Address: Innovation Anytime, Anyplace by Anybody
Virudhunagar, India July 2013

Kalaignar Institute of Technology

Address: Innovation Anytime, Anyplace by Anybody
Coimbatore, India July 2013

Sri Sakthi Institute of Technology

Address: Innovation Anytime, Anyplace by Anybody
Coimbatore, India July 2013

SCAD Engineering College

Address: Innovation Anytime, Anyplace by Anybody
Coimbatore, India July 2013

Akshara Vidyaashram

Address: Innovation Anytime, Anyplace by Anybody
Cuddalore, India July 2013

CK College of Engineering & Technology

Address: Innovation Anytime, Anyplace by Anybody
Cuddalore, India July 2013

Sathyabama University

Address: Overcoming Hurdles and Believing in Oneself to Fulfill One's Destiny
Chennai, India July 2013

Infosys

Address: How Innovation can Happen: Innovation Anytime, Anyplace by Anybody
Chennai, India July 2013

GT Aloha Vidyamandir

Address: Integrate and Innovate
Chennai, India July 2013

Vellore Institute of Technology

Address: Siddha: The First Systems Biology
Vellore, India July 2013

Sri Sairam Engineering college & Sri Sairam Homoeopathy Medical College

Address: Innovation and the Invention of Email / Integration of Ancient and Alternative
Medicine
Systems
Chennai, India July 2013

Sona University

Address: Innovation Anytime, Anyplace by Anybody
Salem, India July 2013

Vinayaka Missions University

Address: Innovation Can Happen Anywhere
Salem, India July 2013

Sastha Tamil Foundation

Address: Innovation and Systems
Plano, TX April 2013

The Consortium of Health and Military Performance

Address: A Revolution in Medical Education
Uniformed Universities of Health Sciences, April 2013

MIT Traditional Medicines Society

Address: EAST MEETS WEST: Traditional Medicines + Modern Systems Biology
MIT, Cambridge, MA February 5, 2013 to April 21, 2013

MIT Biological Engineering Department Lecture Series

Address: EAST MEETS WEST: Traditional Medicines + Modern Systems Biology
MIT, Cambridge, MA September 9, 2011 to December 5, 2011

MIT Lecture Series

Address: EAST MEETS WEST: Traditional Medicines + Modern Systems Biology
MIT, Cambridge, MA September 9, 2010 to December 9, 2010

Customer Response Summit

Address: PREDICTING THE FUTURE: Are You REALLY Ready to Listen?
Westin Kierland Resort & Spa, Scottsdale, AZ November 3rd & 4th, 2010

Visual Interpretations Conference

Address: Collaborative Cave Drawings of Social Interactions: Simple Visualizations of Complex
Phenomena humanities + digital Visual Interpretations Conference @ MIT, Cambridge, MA
May 2010

BIO-IT Conference In Silico Biology

Address: Modeling the Cell
BIO-IT Conference, Boston, MA April 2009

Sri Ramachandra University

Address: Integration of Yogic Science and Systems Biology
Sri Ramachandra University, Chennai, IN, March 2009

SIAM Conference on Multi-Scale Systems

Address: Scalable Architecture for Integrating Multiple Biological Pathway Models
Montreal, CANADA August 2008

Genome Biology Conference - KEYNOTE SPEAKER

Address: The Mission of Systems Biology
Genome Biology Conference, San Francisco, CA June 2007

MIT UROP Panel

Address: Opportunities for Research at MIT
MIT UROP, Cambridge, MA February 2007

MIT Singapore Symposium

Address: Cytosolve
SMA Alliance Symposium, Singapore, January 2007

MIT GAME Seminar

Address: Modeling the Cell

Graduate Mechanical Engineering Students Seminar, Cambridge, MA 2005

Effective E-Mail Marketing Campaigns

Address: Measure your Success: New Metrics for E-Mail Marketing

The Institute for International Research, San Francisco, CA, February 2002

Excellence in E-CRM Conference

Address: The Big Lie of CRM

Allstate Corporation Conference Center, Northbrook, Ill. November 2001

E-Marketing / E-Service Seminar Series

Address: E-Mail Project Solutions

Cambridge Education Center, Cambridge, MA December 2001

EU Conference: Artificial Intelligence

How to Increase Banking Business and Open New Dialogue with On-line Customers

Address: E-Business Strategies for CRM

Realvision Vicenza e NTI UK Italia, *Vicenza, Italy, June 2001*

Pre-Conference Lecture, E-Mail2001 @ MIT Conference

Keynote Address: The Pulse of the Industry

Becton, Dickinson and Company, Franklin Lakes, New Jersey, May 2001

Nothing But New Forum at Fidelity Center for Applied Technology

Keynote Address: E-Mail Marketing Strategies

Fidelity Center for Applied Technologies, *Boston, MA, April 2001*

E-Mail2001@MIT Conference: Intelligent Life

Keynote Address: The Corporate Nervous System

MIT University Park Hotel, *Cambridge, MA, January 2001*

Southern India E-Commerce Conference 2000

Keynote Address: E-Mail = E-Commerce

Advertising Club of Madras, *Chennai, India, December 2000*

Le Potenzialita del Marketing On-line in Italy

Keynote Address: Marketing On-line in Italy: How It Can Be Done

Brodeur Image Time, *Milan, Italy, December 2000*

2000 General Motors Dealer Summit

Keynote Address: eCRM - How E-Mail Helps Your Business

Maritz Performance Improvement Company, *Scottsdale, AZ, October 2000*

Producing Sales in Call Centers

Keynote Address: Implementing Interactive Web

Institute of International Research, *Washington, D.C., June 2000*

Measuring and Managing the Quality of E-Mail Response

Keynote Address: Using Automated Systems to Improve E-Mail Response

InfoCast, *San Francisco, CA, May 2000*

JCPenney Internet Day

Keynote Address: E-Mail - The Ultimate Relationship Builder

JCPenney, *Huston, TX, May 2000*

Annual Investment Conference for Private Companies

Keynote Address: Electronic Customer Relationship Management

Massachusetts Software and Internet Council, World Trade Center, *Boston, MA, April 2000*

Innovators Breakfast Series

Open Discussion: The eCRM Problem

Massachusetts Institute of Technology, New York Academy of Sciences, *New York, NY, April 2000*

Innovators Breakfast Series

Open Discussion: The Power of E-Mail - Brand Loyalty in Real Time

Massachusetts Institute of Technology, National Press Club, *Washington, D.C., April 2000*

American Express, Naples Conference

Keynote Address: Electronic Customer Relationship Management

American Express, *Naples, FL, March 2000*

American Express, Bermuda Conference

Keynote Address: Electronic Customer Relationship Management

American Express Delivery Group, *South Hampton, Bermuda, March 2000*

Customer E-Mail Management

Keynote Address: Using Automated Systems to Improve E-Mail Response

International Quality & Production Center, *London, England, February 2000*

GM e-Wow Speaker Series: Building Customer Relationships Online

Keynote Address: Electronic Customer Relationship Management

General Motors Global Brand Management College, *Detroit, Michigan, February 2000*

Innovators Breakfast Series

Open Discussion: Is software That Answers E-Mail Automatically the Future of On-line Marketing?

Massachusetts Institute of Technology, *Cambridge, MA, February 2000*

Internet Customer Relationship Management

Keynote Address: Electronic Customer Relationship Management

The Institute for International Research, *San Diego, CA, January 2000*

Electronic Commerce World 1999 Conference

Educational Track: E-Mail--The Ultimate Relationship Builder

EC World 2001 Conference, *Orlando, FL, October 1999*

Technology Based Customer Care ICM Conference

Keynote Address: E-Mail = E-Commerce

ICM Conferences, Atlanta, *Georgia, February 1999*

DISNEY INSTITUTE/ OOPS Conference

Address: Object Oriented Programming, 1998

Other Seminar Leaders: Alan Kay

Books and Chapters in Books

The EMAIL Revolution

Author: V.A. Shiva

Publisher: Allworth Press, New York, 1997

E-Mail: The Ultimate Relationship Builder, Volume (In Progress)

Volume I, Volume II, Volume II

Author: V.A. Shiva

The Internet Publicity Guide: How to Maximize your Marketing and Promotion in Cyberspace

Author: V.A. Shiva

Publisher: Allworth Press, New York, 1997

Arts and The Internet: A Guide to the Revolution,

Author: V.A. Shiva

Publisher: Allworth Press, 1996, New York

Chapter on Electrodynamics, Dynamics,

Chapter in Book by Prof. Williams

Chapter in Communications Arts

Computer Assisted Automatic Indexing

Document Analysis Conference, October, 1994

Author: V.A. Shiva Ayyadurai, Submitted for Publication

Unsupervised Hierarchical Clustering of Fiber Interphases for Materials Classification

American Society of Non-Destructive Testing (ASNT) Conference, April, 1993

Authors: V.A. Shiva Ayyadurai, S. Cimaszewski, J.H. Williams. Jr.

Neural Network Based Hybrid System for Handwritten Character Recognition

Sloan School of Management Technical Report Fall, 1991

Author: Shiva Ayyadurai

Visualization of Wave Propagation in Anisotropic Media

Master of Science Thesis, MIT Media Laboratory February, 1990

Author: S. Ayyadurai

A Workstation for Particle Motion and Flow Analysis

IEEE Computers in Medicine, New Orleans, LA, November, 1988

Authors: Ayyadurai, Novakovic, Gordana, Langer, Bob

Blood Deheparinization in a Fluidized Bed Reactor

Proceedings of the Canadian Conference on Fluid Dynamics, 1987

Author: Novakovic, G., Ayyadurai, S., Michelson, L.

Prototype Expert System for Bridge Deck Deteriorization

Project Report to NSF, September, 1986

Authors: Maser, Ken, Schott, Jean-Pierre, Ayyadurai, Shiva

Sleep Stage and Apnea Pattern Analysis, pp. 505-506

Journal of the International Federation of Medical and Biological Engineering, Espoo Finland, August, 1985

Authors: Laximinarayan, S. Ayyadurai, S., Michelson, L.,

Ayyadurai's Four Point Theorem

The Mathematics Teacher, Spring, 1981

Author: Shiva Ayyadurai

Industry RFP Awards

Allstate Corporation, Business Intelligence and Customer Care Technology (\$1,500,000.00)

AT & T, Business Intelligence and Customer Care Technology (\$120,000.00)

American Express, Business Intelligence and Customer Care Technology (\$4,120,000.00)

BancOne Services Corporation, Business Intelligence and Customer Care Technology (\$920,000.00)

BThree (Warner), Business Intelligence and Customer Care Technology (\$520,000.00)

Bausch & Lomb, Business Intelligence and Customer Care Technology (\$25,000.00)

Becton Dickinson, Business Intelligence and Customer Care Technology (\$1,110,000.00)

Bush for President, Inc., Business Intelligence and Customer Care Technology (\$820,000.00)

Cendant, Business Intelligence and Customer Care Technology (\$20,000.00)

Citigroup, Business Intelligence and Customer Care Technology (\$3,150,000.00)

Calvin Klein Cosmetics Company, Business Intelligence and Customer Care Technology (\$830,000.00)
Classified Ventures, Inc., Business Intelligence and Customer Care Technology (\$710,000.00)
Dial Corporation, Business Intelligence and Customer Care Technology (\$110,000.00)
Entertainment Media Services, Inc., Business Intelligence and Customer Care Technology (\$150,000.00)
Fireman's Fund Insurance Company, Business Intelligence and Customer Care Technology (\$80,000.00)
Gateway, Business Intelligence and Customer Care Technology (\$1,170,000.00)
GEICO, Business Intelligence and Customer Care Technology (\$2,250,000.00)
Hasbro Interactive, Inc., Business Intelligence and Customer Care Technology (\$510,000.00)
Hershey Foods Corporation, Business Intelligence and Customer Care Technology (\$9,500.00)
Hilton Hotel, Business Intelligence and Customer Care Technology (\$1,050,000.00)
HomePortfolio, Inc., Business Intelligence and Customer Care Technology (\$315,000.00)
The IT Group, Business Intelligence and Customer Care Technology (\$25,000.00)
John Hancock Financial Services, Business Intelligence and Customer Care Technology (\$660,000.00)
JCPenney, Business Intelligence and Customer Care Technology (\$5,230,000.00)
LA Times, Business Intelligence and Customer Care Technology (\$20,000.00)
Lycos, Inc., Business Intelligence and Customer Care Technology (\$670,000.00)
Kimberly Clark Corporation, Business Intelligence and Customer Care Technology (\$130,000.00)
People, Business Intelligence and Customer Care Technology (\$120,000.00)
Procter & Gamble Company, Business Intelligence and Customer Care Technology (\$340,000.00)
Purina, Business Intelligence and Customer Care Technology (\$280,000.00)
QVC, E-Mail Management: Inbound and Outbound E-Mail (\$890,000.00)
Rx.com, Inc., Business Intelligence and Customer Care Technology (\$70,000.00)
Salomon Smith Barney, Business Intelligence and Customer Care Technology (\$120,000.00)
Silicon Graphics, Inc., Business Intelligence and Customer Care Technology (\$310,000.00)
Sprint Spectrum, Business Intelligence and Customer Care Technology (\$850,000.00)
TELUS Corporation, Business Intelligence and Customer Care Technology (\$90,000.00)
Time Incorporated, Business Intelligence and Customer Care Technology (\$45,000.00)
Turner Entertainment, Business Intelligence and Customer Care Technology (\$9,500.00)
United States Senate, Business Intelligence and Customer Care Technology (\$890,000.00)
Unilever Consumer Services, Business Intelligence and Customer Care Technology (\$780,000.00)
Professional ART RFP Awards
Aaron Concert Management, Art Promotional Support Online Branding Grant (\$15,000.00)
American Indian Contemporary Arts, Art Promotional Support Online Branding Grant (\$15,000.00)
Allworth Press, Art Promotional Support Online Branding (\$15,000.00)
Alvin Ailey American Dance Theater, Art Promotional Support Online Branding Grant (\$80,000.00)
Art Complex Museum, Art Promotional Support Online Branding Grant (\$15,000.00)
Boston Ballet, Art Promotional Support Online Branding Grant (\$40,000.00)

Boston Casting Company, Art Promotional Support Online Branding Grant (\$15,000.00)
Cambridge Art Cooperative, Art Promotional Support Online Branding Grant (\$15,000.00)
Cambridge Multi-Cultural Art Center, Art Promotional Support Online Branding Grant (\$15,000.00)
Dance Umbrella, Art Promotional Support Online Branding Grant (\$15,000.00)
Fashion Cafe, Art Promotional Support Online Branding (\$15,000.00)
Green Linnet/Xeonphile, Art Promotional Support Online Branding (\$15,000.00)
Handle & Haydn Society, Art Promotional Support Online Branding Grant (\$15,000.00)
Honolulu Academy of Arts, Art Promotional Support Online Branding Grant (\$15,000.00)
International Arts Manager, Art Promotional Support Online Branding Grant (\$15,000.00)
Houston Ballet, Art Promotional Support Online Branding Grant (\$15,000.00)
Lyric Stage, Art Promotional Support Online Branding Grant (\$15,000.00)
MMC Recordings, Art Promotional Support Online Branding (\$15,000.00)
MUSICIAN Magazine, Art Promotional Support Online Branding (\$40,000.00)
National Association Performing Artists Managers of America (NAPAMA), Online Branding Grant (\$15,000.00)
New Age Voice, Art Promotional Support Online Branding Grant (\$15,000.00)
Poetry Alive! Art Promotional Support Online Branding Grant (\$15,000.00)
Sedia Furniture Design, Art Promotional Support Online Branding Grant (\$15,000.00)
Sculpture Review, Art Promotional Support Online Branding Grant (\$15,000.00)
Strand Theater, Art Promotional Support Online Branding Grant (\$15,000.00)
Very Special Art, National, Art Promotional Support Online Branding Grant (\$70,000.00)
Very Special Art, Massachusetts, Art Promotional Support Online Branding Grant (\$30,000.00)
World Music, Art Promotional Support Online Branding Grant (\$15,000.00)
Young Concert Artists, Art Promotional Support Online Branding Grant (\$15,000.00)
ZIMA, Art Promotional Support Online Branding Grant (\$15,000.00)

PROFESSIONAL ART WORKSHOPS

Arts & The Internet

Art Promotional Through Online Branding

Arts & The Internet: A Guide to the Revolution

Empowering the artist and art organization to reach a global audience, using new technological tools.

MIT Classroom of the Future, 1996

Research Interests

Mathematical Modeling, Email Technologies, Systems Thinking, Organizational Structure and Planning, User Interface Design, Visual Arts, Politics, Nutrition & Health

Community Interests

MIT Graduate Alumni Consortium for Improving MIT Community, Very Special Arts, World Music, Read Across America, Spare Change, The Meena Scholarship Fund for Gifted South Indian Students, Kauai Hindu Temple Construction Fund

ThePeteSantilliShow.com



Exh. B

**Joint Cybersecurity Advisory
Iranian Advanced Persistent Threat Actor
Identified Obtaining Voter Registration Data**

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TLP:WHITE

Product ID: AA20-304A

October 30, 2020

Iranian Advanced Persistent Threat Actor Identified Obtaining Voter Registration Data

SUMMARY

This advisory uses the MITRE Adversarial Tactics, Techniques, and Common Knowledge (ATT&CK®) framework. See the [ATT&CK for Enterprise](#) framework for all referenced threat actor techniques.

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

TECHNICAL DETAILS

Analysis by CISA and the FBI indicates this actor scanned state websites, to include state election websites, between September 20 and September 28, 2020, with the Acunetix vulnerability scanner (*Active Scanning: Vulnerability Scanning [T1595.002]*). Acunetix is a widely used and legitimate web scanner, which has been used by threat actors for nefarious purposes. Organizations that do not regularly use Acunetix should monitor their logs for any activity from the program that originates from IP addresses provided in this advisory and consider it malicious reconnaissance behavior.

Additionally, CISA and the FBI observed this actor attempting to exploit websites to obtain copies of voter registration data between September 29 and October 17, 2020 (*Exploit Public-Facing*

¹ See FBI FLASH, ME-000138-TT, disseminated 10/29/20, <https://www.ic3.gov/Media/News/2020/201030.pdf>. This disinformation (hereinafter, “the propaganda video”) was in the form of a video purporting to misattribute the activity to a U.S. domestic actor and implies that individuals could cast fraudulent ballots, even from overseas. <https://www.odni.gov/index.php/newsroom/press-releases/item/2162-dni-john-ratcliffe-s-remarks-at-press-conference-on-election-security>.

To report suspicious or criminal activity related to information found in this Joint Cybersecurity Advisory, contact your local FBI field office at www.fbi.gov/contact-us/field, or the FBI’s 24/7 Cyber Watch (CyWatch) at (855) 292-3937 or by e-mail at CyWatch@fbi.gov. When available, please include the following information regarding the incident: date, time, and location of the incident; type of activity; number of people affected; type of equipment used for the activity; the name of the submitting company or organization; and a designated point of contact. To request incident response resources or technical assistance related to these threats, contact CISA at Central@cisa.dhs.gov.

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Application [T1190]). This includes attempted exploitation of known vulnerabilities, directory traversal, Structured Query Language (SQL) injection, web shell uploads, and leveraging unique flaws in websites.

CISA and the FBI can confirm that the actor successfully obtained voter registration data in at least one state. The access of voter registration data appeared to involve the abuse of website misconfigurations and a scripted process using the cURL tool to iterate through voter records. A review of the records that were copied and obtained reveals the information was used in the propaganda video.

CISA and FBI analysis of identified activity against state websites, including state election websites, referenced in this product cannot all be fully attributed to this Iranian APT actor. FBI analysis of the Iranian APT actor's activity has identified targeting of U.S. elections' infrastructure (*Compromise Infrastructure* [T1584]) within a similar timeframe, use of IP addresses and IP ranges – including numerous virtual private network (VPN) service exit nodes – which correlate to this Iran APT actor (*Gather Victim Host Information* [T1592]), and other investigative information.

Reconnaissance

The FBI has information indicating this Iran-based actor attempted to access PDF documents from state voter sites using advanced open-source queries (*Search Open Websites and Domains* [T1539]). The actor demonstrated interest in PDFs hosted on URLs with the words “vote” or “voter” and “registration.” The FBI identified queries of URLs for election-related sites.

The FBI also has information indicating the actor researched the following information in a suspected attempt to further their efforts to survey and exploit state election websites.

- YOURLS exploit
- Bypassing ModSecurity Web Application Firewall
- Detecting Web Application Firewalls
- SQLmap tool

Acunetix Scanning

CISA's analysis identified the scanning of multiple entities by the Acunetix Web Vulnerability scanning platform between September 20 and September 28, 2020 (*Active Scanning: Vulnerability Scanning* [T1595.002]).

The actor used the scanner to attempt SQL injection into various fields in `/registration/registration/details` with status codes 404 or 500:

```
/registration/registration/details?addresscity=-1 or 3*2<(0+5+513-513) --
&addressstreet1=xxxxx&btbeginregistration=begin voter
registration&btnnextelectionworkerinfo=next&btnnextpersonalinfo=next&btnnextresde
tails=next&btnnextvoterinformation=next&btsubmit=submit&chkageverno=on&chkagever
yes=on&chkcitizenno=on&chkcitizenyes=on&chkdisabledvoter=on&chkelectionworker=on&
chkresprivate=1&chkstatecancel=on&dlnumber=1&dob=xxxx/x/x&email=sample@email.tst&
```

```
firstname=xxxxx&gender=radio&hdnaddresscity=&hdngender=&last4ssn=xxxxx&lastname=x  
xxxxinjeuee&mailaddresscountry=sample@xxx.xxx&mailaddressline1=sample@email.tst&  
mailaddressline2=sample@xxx.xxx&mailaddressline3=sample@xxx.xxx&mailaddressstate=  
aa&mailaddresszip=sample@xxxx.xxx&mailaddresszipex=sample@xxx.xxx&middlename=xxxx  
x&overseas=1&partycode=a&phoneno1=xxx-xxx-xxxx&phoneno2=xxx-xxx-  
xxxx&radio=consent&statecancelcity=xxxxxxx&statecancelcountry=usa&statecancelstat  
e=XXaa&statecancelzip=xxxxx&statecancelzipext=xxxxx&suffixname=esq&txtmailaddress  
city=sample@xxx.xxx
```

Requests

The actor used the following requests associated with this scanning activity.

```
2020-09-26 13:12:56 x.x.x.x GET /x/x v[$acunetix]=1 443 - x.x.x.x  
Mozilla/5.0+(Windows+NT+6.1;+WOW64)+AppleWebKit/537.21+(KHTML,+like+Gecko)+Chrome/41.  
0.2228.0+Safari/537.21 - 200 0 0 0
```

```
2020-09-26 13:13:19 X.X.x.x GET /x/x voterid[$acunetix]=1 443 - x.x.x.x  
Mozilla/5.0+(Windows+NT+6.1;+WOW64)+AppleWebKit/537.21+(KHTML,+like+Gecko)+Chrome/41.  
0.2228.0+Safari/537.21 - 200 0 0 1375
```

```
2020-09-26 13:13:18 .X.x.x GET /x/x voterid=;print(md5(acunetix_wvs_security_test));  
443 - X.X.x.x
```

User Agents Observed

CISA and FBI have observed the following user agents associated with this scanning activity.

```
Mozilla/5.0+(Windows+NT+6.1;+WOW64)+AppleWebKit/537.21+(KHTML,+like+Gecko)+Chrome  
/41.0.2228.0+Safari/537.21 - 500 0 0 0
```

```
Mozilla/5.0+(X11;+U;+Linux+x86_64;+en-  
US;+rv:1.9b4)+Gecko/2008031318+Firefox/3.0b4
```

```
Mozilla/5.0+(X11;+U;+Linux+i686;+en-  
US;+rv:1.8.1.17)+Gecko/20080922+Ubuntu/7.10+(gutsy)+Firefox/2.0.0.17
```

Exfiltration

Obtaining Voter Registration Data

Following the review of web server access logs, CISA analysts, in coordination with the FBI, found instances of the cURL and FDM User Agents sending GET requests to a web resource associated with voter registration data. The activity occurred between September 29 and October 17, 2020. Suspected scripted activity submitted several hundred thousand queries iterating through voter

TLP:WHITE

identification values, and retrieving results with varying levels of success [*Gather Victim Identity Information* (T1589)]. A sample of the records identified by the FBI reveals they match information in the aforementioned propaganda video.

Requests

The actor used the following requests.

```
2020-10-17 13:07:51 x.x.x.x GET /x/x voterid=XXXX1 443 - x.x.x.x curl/7.55.1 - 200 0 0 1406
```

```
2020-10-17 13:07:55 x.x.x.x GET /x/x voterid=XXXX2 443 - x.x.x.x curl/7.55.1 - 200 0 0 1390
```

```
2020-10-17 13:07:58 x.x.x.x GET /x/x voterid=XXXX3 443 - x.x.x.x curl/7.55.1 - 200 0 0 1625
```

```
2020-10-17 13:08:00 x.x.x.x GET /x/x voterid=XXXX4 443 - x.x.x.x curl/7.55.1 - 200 0 0 1390
```

Note: incrementing `voterid` values in `cs_uri_query` field

User Agents

CISA and FBI have observed the following user agents.

```
FDM+3.x
```

```
curl/7.55.1
```

```
Mozilla/5.0+(Windows+NT+6.1;+WOW64)+AppleWebKit/537.21+(KHTML,+like+Gecko)+Chrome/41.0.2228.0+Safari/537.21 - 500 0 0 0
```

```
Mozilla/5.0+(X11;+U;+Linux+x86_64;+en-US;+rv:1.9b4)+Gecko/2008031318+Firefox/3.0b4
```

See figure 1 below for a timeline of the actor's malicious activity.

TECHNICAL FINDINGS

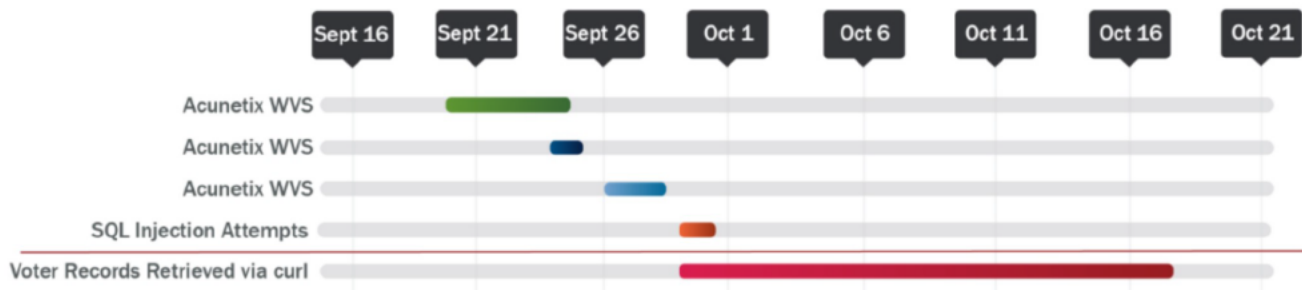


Figure 1: Overview of malicious activity

MITIGATIONS

Detection

Acunetix Scanning

Organizations can identify Acunetix scanning activity by using the following keywords while performing log analysis.

- `$acunetix`
- `acunetix_wvs_security_test`

Indicators of Compromise

For a downloadable copy of IOCs, see [AA20-304A.stix](#).

Disclaimer: Many of the IP addresses included below likely correspond to publicly available VPN services, which can be used by individuals all over the world. Although this creates the potential for false positives, any activity listed should warrant further investigation. The actor likely uses various IP addresses and VPN services.

The following IPs have been associated with this activity.

- 102.129.239[.]185 (Acunetix Scanning)
- 143.244.38[.]60 (Acunetix Scanning and cURL requests)
- 45.139.49[.]228 (Acunetix Scanning)
- 156.146.54[.]90 (Acunetix Scanning)
- 109.202.111[.]236 (cURL requests)
- 185.77.248[.]17 (cURL requests)
- 217.138.211[.]249 (cURL requests)
- 217.146.82[.]207 (cURL requests)
- 37.235.103[.]85 (cURL requests)
- 37.235.98[.]64 (cURL requests)
- 70.32.5[.]96 (cURL requests)

- 70.32.6[.]20 (cURL requests)
- 70.32.6[.]8 (cURL requests)
- 70.32.6[.]97 (cURL requests)
- 70.32.6[.]98 (cURL requests)
- 77.243.191[.]21 (cURL requests and FDM+3.x (Free Download Manager v3) enumeration/iteration)
- 92.223.89[.]73 (cURL requests)

CISA and the FBI are aware the following IOCs have been used by this Iran-based actor. These IP addresses facilitated the mass dissemination of voter intimidation email messages on October 20, 2020.

- 195.181.170[.]244 (Observed September 30 and October 20, 2020)
- 102.129.239[.]185 (Observed September 30, 2020)
- 104.206.13[.]27 (Observed September 30, 2020)
- 154.16.93[.]125 (Observed September 30, 2020)
- 185.191.207[.]169 (Observed September 30, 2020)
- 185.191.207[.]52 (Observed September 30, 2020)
- 194.127.172[.]98 (Observed September 30, 2020)
- 194.35.233[.]83 (Observed September 30, 2020)
- 198.147.23[.]147 (Observed September 30, 2020)
- 198.16.66[.]139 (Observed September 30, 2020)
- 212.102.45[.]3 (Observed September 30, 2020)
- 212.102.45[.]58 (Observed September 30, 2020)
- 31.168.98[.]73 (Observed September 30, 2020)
- 37.120.204[.]156 (Observed September 30, 2020)
- 5.160.253[.]50 (Observed September 30, 2020)
- 5.253.204[.]74 (Observed September 30, 2020)
- 64.44.81[.]68 (Observed September 30, 2020)
- 84.17.45[.]218 (Observed September 30, 2020)
- 89.187.182[.]106 (Observed September 30, 2020)
- 89.187.182[.]111 (Observed September 30, 2020)
- 89.34.98[.]114 (Observed September 30, 2020)
- 89.44.201[.]211 (Observed September 30, 2020)

Recommendations

The following list provides recommended self-protection mitigation strategies against cyber techniques used by advanced persistent threat actors:

- Validate input as a method of sanitizing untrusted input submitted by web application users. Validating input can significantly reduce the probability of successful exploitation by providing

protection against security flaws in web applications. The types of attacks possibly prevented include SQL injection, Cross Site Scripting (XSS), and command injection.

- Audit your network for systems using Remote Desktop Protocol (RDP) and other internet-facing services. Disable unnecessary services and install available patches for the services in use. Users may need to work with their technology vendors to confirm that patches will not affect system processes.
- Verify all cloud-based virtual machine instances with a public IP, and avoid using open RDP ports, unless there is a valid need. Place any system with an open RDP port behind a firewall and require users to use a VPN to access it through the firewall.
- Enable strong password requirements and account lockout policies to defend against brute-force attacks.
- Apply multi-factor authentication, when possible.
- Maintain a good information back-up strategy by routinely backing up all critical data and system configuration information on a separate device. Store the backups offline, verify their integrity, and verify the restoration process.
- Enable logging and ensure logging mechanisms capture RDP logins. Keep logs for a minimum of 90 days and review them regularly to detect intrusion attempts.
- When creating cloud-based virtual machines, adhere to the cloud provider's best practices for remote access.
- Ensure third parties that require RDP access follow internal remote access policies.
- Minimize network exposure for all control system devices. Where possible, critical devices should not have RDP enabled.
- Regulate and limit external to internal RDP connections. When external access to internal resources is required, use secure methods, such as a VPNs. However, recognize the security of VPNs matches the security of the connected devices.
- Use security features provided by social media platforms; use [strong passwords](#), change passwords frequently, and use a different password for each social media account.
- See CISA's Tip on [Best Practices for Securing Election Systems](#) for more information.

General Mitigations

Keep applications and systems updated and patched

Apply all available software updates and patches and automate this process to the greatest extent possible (e.g., by using an update service provided directly from the vendor). Automating updates and patches is critical because of the speed of threat actors to create new exploits following the release of a patch. These "N-day" exploits can be as damaging as zero-day exploits. Ensure the authenticity and integrity of vendor updates by using signed updates delivered over protected links. Without the rapid and thorough application of patches, threat actors can operate inside a defender's patch cycle.²

² NSA "NSA'S Top Ten Cybersecurity Mitigation Strategies" <https://www.nsa.gov/Portals/70/documents/what-we-do/cybersecurity/professional-resources/csi-nas-top-10-cybersecurity-mitigation-strategies.pdf>

Additionally, use tools (e.g., the OWASP Dependency-Check Project tool³) to identify the publicly known vulnerabilities in third-party libraries depended upon by the application.

Scan web applications for SQL injection and other common web vulnerabilities

Implement a plan to scan public-facing web servers for common web vulnerabilities (e.g., SQL injection, cross-site scripting) by using a commercial web application vulnerability scanner in combination with a source code scanner.⁴ Fixing or patching vulnerabilities after they are identified is especially crucial for networks hosting older web applications. As sites get older, more vulnerabilities are discovered and exposed.

Deploy a web application firewall

Deploy a web application firewall (WAF) to prevent invalid input attacks and other attacks destined for the web application. WAFs are intrusion/detection/prevention devices that inspect each web request made to and from the web application to determine if the request is malicious. Some WAFs install on the host system and others are dedicated devices that sit in front of the web application. WAFs also weaken the effectiveness of automated web vulnerability scanning tools.

Deploy techniques to protect against web shells

Patch web application vulnerabilities or fix configuration weaknesses that allow web shell attacks, and follow guidance on detecting and preventing web shell malware.⁵ Malicious cyber actors often deploy web shells—software that can enable remote administration—on a victim's web server. Malicious cyber actors can use web shells to execute arbitrary system commands commonly sent over HTTP or HTTPS. Attackers often create web shells by adding or modifying a file in an existing web application. Web shells provide attackers with persistent access to a compromised network using communications channels disguised to blend in with legitimate traffic. Web shell malware is a long-standing, pervasive threat that continues to evade many security tools.

Use multi-factor authentication for administrator accounts

Prioritize protection for accounts with elevated privileges, remote access, or used on high-value assets.⁶ Use physical token-based authentication systems to supplement knowledge-based factors such as passwords and personal identification numbers (PINs).⁷ Organizations should migrate away from single-factor authentication, such as password-based systems, which are subject to poor user

³ <https://owasp.org/www-project-dependency-check/>

⁴ NSA "Defending Against the Exploitation of SQL Vulnerabilities to Compromise a Network" <https://apps.nsa.gov/iaarchive/library/ia-guidance/tech-briefs/defending-against-the-exploitation-of-sql-vulnerabilities-to-cfm>

⁵ NSA & ASD "CyberSecurity Information: Detect and Prevent Web Shell Malware" <https://media.defense.gov/2020/Jun/09/2002313081/-1/-1/0/CSI-DETECT-AND-PREVENT-WEB-SHELL-MALWARE-20200422.PDF>

⁶ <https://us-cert.cisa.gov/cdm/event/Identifying-and-Protecting-High-Value-Assets-Closer-Look-Governance-Needs-HVAs>

⁷ NSA "NSA'S Top Ten Cybersecurity Mitigation Strategies" <https://www.nsa.gov/Portals/70/documents/what-we-do/cybersecurity/professional-resources/csi-nas-top-10-cybersecurity-mitigation-strategies.pdf>

choices and more susceptible to credential theft, forgery, and password reuse across multiple systems.

Remediate critical web application security risks

First, identify and remediate critical web application security risks. Next, move on to other less critical vulnerabilities. Follow available guidance on securing web applications.^{8,9,10}

How do I respond to unauthorized access to election-related systems?

Implement your security incident response and business continuity plan

It may take time for your organization's IT professionals to isolate and remove threats to your systems and restore normal operations. In the meantime, take steps to maintain your organization's essential functions according to your business continuity plan. Organizations should maintain and regularly test backup plans, disaster recovery plans, and business continuity procedures.

Contact CISA or law enforcement immediately

To report an intrusion and to request incident response resources or technical assistance, contact CISA (Central@cisa.gov or 888-282-0870) or the FBI through a local field office or the FBI's Cyber Division (CyWatch@ic.fbi.gov or 855-292-3937).

RESOURCES

- CISA Tip: [Best Practices for Securing Election Systems](#)
- CISA Tip: [Securing Voter Registration Data](#)
- CISA Tip: [Website Security](#)
- CISA Tip: [Avoiding Social Engineering and Phishing Attacks](#)
- CISA Tip: [Securing Network Infrastructure Devices](#)
- Joint Advisory: [Technical Approaches to Uncovering and Remediating Malicious Activity](#)
- CISA Insights: [Actions to Counter Email-Based Attacks on Election-related Entities](#)
- FBI and CISA Public Service Announcement (PSA): [Spoofed Internet Domains and Email Accounts Pose Cyber and Disinformation Risks to Voters](#)
- FBI and CISA PSA: [Foreign Actors Likely to Use Online Journals to Spread Disinformation Regarding 2020 Elections](#)
- FBI and CISA PSA: [Distributed Denial of Service Attacks Could Hinder Access to Voting Information, Would Not Prevent Voting](#)
- FBI and CISA PSA: [False Claims of Hacked Voter Information Likely Intended to Cast Doubt on Legitimacy of U.S. Elections](#) FBI and CISA PSA: [Cyber Threats to Voting Processes Could Slow But Not Prevent Voting](#)

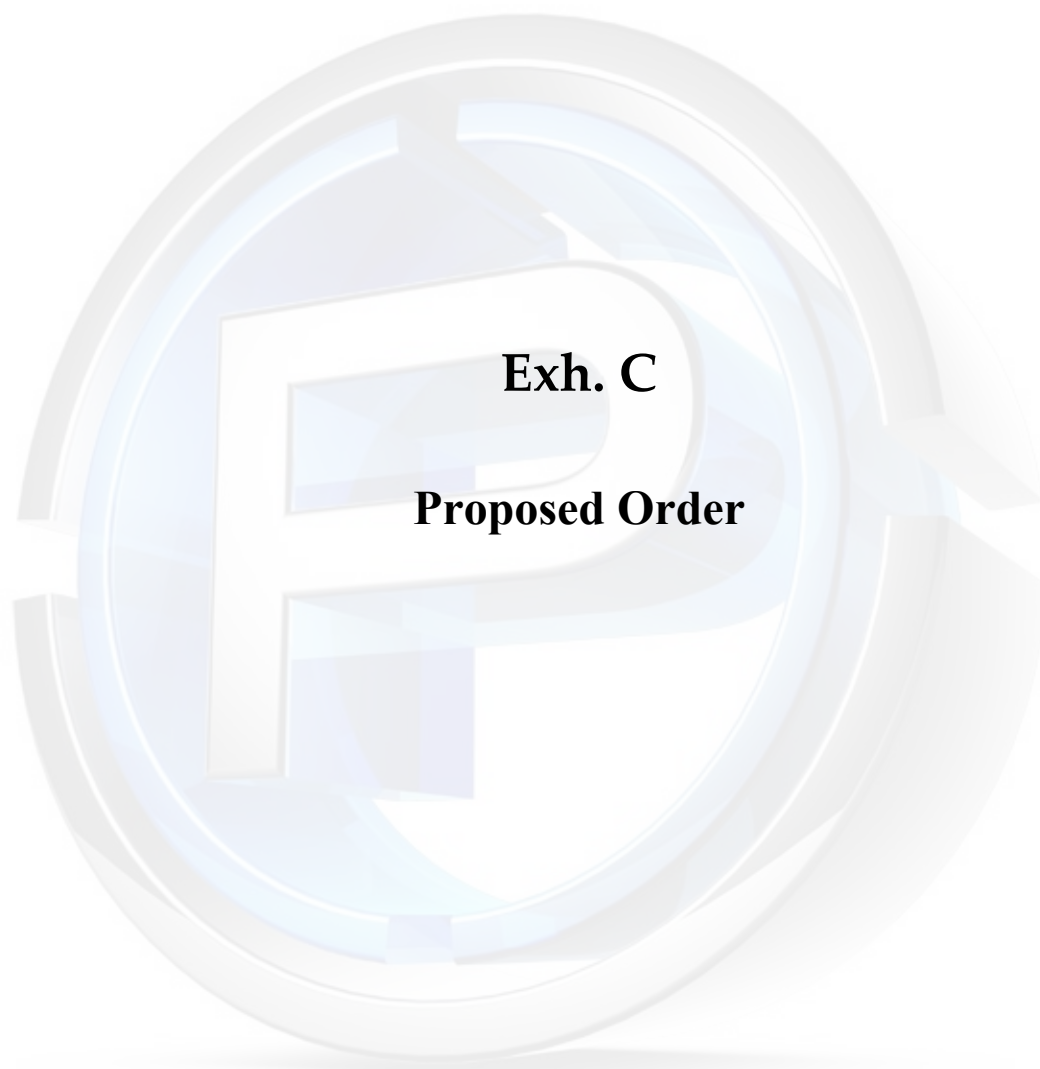
⁸ NSA "Building Web Applications – Security for Developers" <https://apps.nsa.gov/iaarchive/library/ia-guidance/security-tips/building-web-applications-security-recommendations-for.cfm>

⁹ <https://owasp.org/www-project-top-ten/>

¹⁰

https://cwe.mitre.org/top25/archive/2020/2020_cwe_top25.html

- FBI and CISA PSA: [Foreign Actors and Cybercriminals Likely to Spread Disinformation Regarding 2020 Election Results](#)



Exh. C

Proposed Order

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA, ATLANTA DIVISION

**CORECO JA'QAN PEARSON, VIKKI TOWNSEND
CONSIGLIO, GLORIA KAY GODWIN, JAMES
KENNETH CARROLL, CAROLYN HALL
FISHER, CATHLEEN ALSTON LATHAM and
BRIAN JAY VAN GUNDY, JASON M. SHEPHERD
ON BEHALF OF THE COBB COUNTY
REPUBLICAN PARTY**

**CASE NO. 1:20-
cv-4809**

Plaintiffs,

v.

**BRIAN KEMP, in his official capacity as Governor of
Georgia, BRAD RAFFENSPERGER, in his official
capacity as Secretary of State and Chair of the
Georgia State Election Board, DAVID J. WORLEY,
in his official capacity as a member of the Georgia
State Election Board, REBECCA N.SULLIVAN, in
her official capacity as a member of the Georgia State
Election Board, MATTHEW MASHBURN, in his
official capacity as a member of the Georgia State
Election Board, and ANH LE, in her official capacity
as a member of the Georgia State Election Board,**

Defendants.

ORDER GRANTING EMERGENCY INJUNCTIVE RELIEF

THE COURT has before it Plaintiffs' Emergency Motion for Injunctive

Relief filed. November 27, 2020, seeking:

1. An order directing Governor Kemp, Secretary Raffensperger and the Georgia State Board of Elections to de-certify the election results;
2. An order enjoining Governor Kemp from transmitting the currently certified election results to the Electoral College;
3. An order requiring Governor Kemp to transmit certified election results that state that President Donald Trump is the winner of the election;
4. An order that no votes received or tabulated by machines that were not certified as required by federal and state law be counted;
5. A declaratory judgment declaring that Georgia Secretary of State Rule 183-1-14-0.9-.15 violates O.C.G.A. § 21-2-386(a)(2) and the Electors and Elections Clause, U.S. Const. Art. I, § 4;
6. A declaratory judgment that Georgia's failed system of signature verification violates the Electors and Elections Clause by working a de facto abolition of the signature verification requirement;
7. A declaratory judgment declaring that current certified election results violate the Due Process Clause, U.S. Const. Amend. XIV;
8. A declaratory judgment declaring that mail-in and absentee ballot fraud must be remedied with a Full Manual Recount or statistically valid sampling that properly verifies the signatures on absentee ballot envelopes and that invalidates the certified results if the recount or

sampling analysis shows a sufficient number of ineligible absentee ballots were counted;

9. An emergency declaratory judgment that voting machines be seized and impounded immediately for a forensic audit by plaintiffs' experts;
10. A declaratory judgment declaring absentee ballot fraud occurred in violation of Constitutional rights and election laws under state law;
11. A permanent injunction prohibiting the Governor and Secretary of State from transmitting the currently certified results to the Electoral College based on the overwhelming evidence of election tampering; and
12. Immediate production of 36 hours of security camera recording of all rooms used in the voting process at State Farm Arena in Fulton County, GA from 12:00 AM November 3, 2020 to 12:00 PM on November 4, 2020.

Plaintiffs also contend that on November 27, 2020, Union County officials advised that they are going to wipe or reset the voting machines of all data and bring the count back to zero on Monday, November 30, 2020 for purposes of a machine recount commencing that day. Plaintiffs contend this act and any like it must be immediately enjoined across the state of Georgia pursuant to 52 U.S.C. § 20701 (preservation of voting records) because resetting the machines would destroy the evidence on them and make impossible any forensic computer audit of

the election computer systems for the 2020 General Election. Plaintiffs therefore ask for an injunction to prevent any wiping of data, and to ensure forensic analysis can take place.

Plaintiffs further ask for emergency injunctive to expedite the flow of discovery material and to preserve the Voting Systems computer data information;

The Court has reviewed the terms and conditions of this Emergent Injunctive Relief Order, and for good cause shown IT IS HEREBY ORDERED THAT:

1. A Temporary Restraining Order is immediately in effect to preserve the voting machines in the State of Georgia, and to prevent any wiping of data, until such time as a full computer audit is completed.
2. Governor Kemp, Secretary Raffensperger and the Georgia State Board of Elections are to de-certify the election results.
3. Governor Kemp is hereby enjoined from transmitting the currently certified election results to the Electoral College.
4. Governor Kemp is required to transmit certified election results that state that President Donald Trump is the winner of the election.
5. It is hereby Ordered that no votes received or tabulated by machines that were not certified as required by federal and state law be counted.

6. A declaratory judgment is hereby issued declaring that Georgia Secretary of State Rule 183-1-14-0.9-.15 violates the Electors and Elections Clause, U.S. Const. art. I, § 4.
7. A declaratory judgment declaring that Georgia's failed system of signature verification violates the Electors and Elections Clause by working a de facto abolition of the signature verification requirement is hereby issued.
8. A declaratory judgment declaring that current certified election results violates the Due Process Clause, U.S. Const. Amend. XIV is hereby issued.
9. A declaratory judgment declaring that mail-in and absentee ballot fraud must be remedied with a Full Manual Recount or statistically valid sampling that properly verifies the signatures on absentee ballot envelopes and that invalidates the certified results if the recount or sampling analysis shows a sufficient number of ineligible absentee ballots were counted Is hereby issued.
10. An emergency declaratory judgment that voting machines in Fulton County be seized and impounded immediately for a forensic audit—by plaintiffs' experts is hereby issued.

11. A declaratory judgment declaring absentee ballot fraud occurred in violation of Constitutional rights, Election laws and under state law Is hereby issued.

12. A permanent injunction prohibiting the Governor and Secretary of State from transmitting the currently certified results to the Electoral College based on the overwhelming evidence of election tampering.

13. Immediate production of 36 hours of security camera recording of all rooms used in the voting process at State Farm Arena in Fulton County, GA from 12:00 AM November 3, 2020 to 12:00 PM on November 4, 2020 is hereby ordered.

It is so Ordered, this _____ day of _____ 2020.

Timothy C. Batten
U.S. District Court Judge
Northern District of Georgia
Atlanta Division

Presented by:

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