

Declaration of Chris [REDACTED]

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

1. I am over the age of 21 years, and I am under no legal disability, which would prevent me from giving this declaration.
2. I hold dual Doctorates and dual Masters in Economics and Management Science & Engineering from Stanford University and a BS in Economics from Arizona State University. I hold roles in the public sector, private sector, and higher education.
3. I reside at [REDACTED]
4. Georgia uses Dominion Voting Systems (DVS), which has a history of technical glitches that have not been fixed. DVS was rejected three times in Texas because of its inherent defects. It has caused multiple anomalies and delays. In Gwinnett County alone, these software glitches have affected roughly 80,000 absentee mail-in ballots.

Although election officials have said that these glitches have been corrected and are not reflected in the final tallies, it is hard to take these statements on faith without any evidence, particularly given DVS' bad track record. Moreover, it is also possible that there are many other instances of "glitches" that were not caught.

5. These glitches are on top of those that occurred in Morgan and Spalding counties. Marcia Ridley, elections supervisor at Spalding County Board of Elections, said that the company "uploaded something last night, which is not normal, and it caused a glitch," preventing poll workers from "using the pollbooks to program the

smart cards that voters insert into voting machines” and causing delays for voters.

6. Roughly 1.5 million Georgia voters requested absentee ballots, which is far above the 200,000 absentee ballots from 2016, and is 30% of their estimated 5 million voter turnout. As of November 6th at 6pm, Georgia election officials said that more than 14,200 provisional ballots needed to be counted. Jeff Greenburg, a former Mercer County elections director, remarked that over his 13 years in the role, he had only processed 200 provisional ballots in total and it would take his county 2.5 days to process 650 provision ballots. That implies nearly 55 days to approve, which suggests that the current pace they are approving provisional ballots is implausibly fast if they intend to call the election soon.

It is also curious that the correlation between the number of mail-in votes for Biden net of Trump and the 2016 share of votes for Clinton is stronger than the total votes for Biden net of Trump. This evidence is consistent with the view that manipulation is easier with mail-in votes and more likely to occur where there is less Republican competitive oversight (e.g., poll watchers turned away).

7. The counties with the greatest reported software glitches and delays are also the counties with the biggest swings in votes for Biden. The list of numbers below tabulates the percent change in Democrat votes from one election to the other for some of the most Democrat counties in the state. Importantly, the increase between 2020 and 2016 is systematically larger than the 2008 to 2012 or 2012 to 2016 increases: for example, the median (mean) increase from 2016 to

2020 for these counties was 27% (30.6%), whereas they were only 11.5% (9.8%) and -4% (-2.8%).

These are anomalies that evidence a high likelihood of fraudulent alterations within the software or the system.

Increase in Democrat Votes from Election-to-Election, in %

County 2008-2012 / 2012-2016 / 2016-2020

Fulton -6% 16% 28%

DeKalb -6% 6% 22%

Gwinnett 3% 25% 45%

Cobb -6% 20% 38%

Chatham -4% 3% 26%

Henry 8% 14% 46%

Muscogee -4% -6% 24%

Bibb -1% -5% 18%

Douglas 2% 9% 37%

Clarke -14% 16% 22%

Mean -2.8% 9.8% 30.6%

Median -4% 11.5% 27%

These changes alone are highly suspect. The 2016 to 2020 increase in Democratic votes is at least over double in these counties.

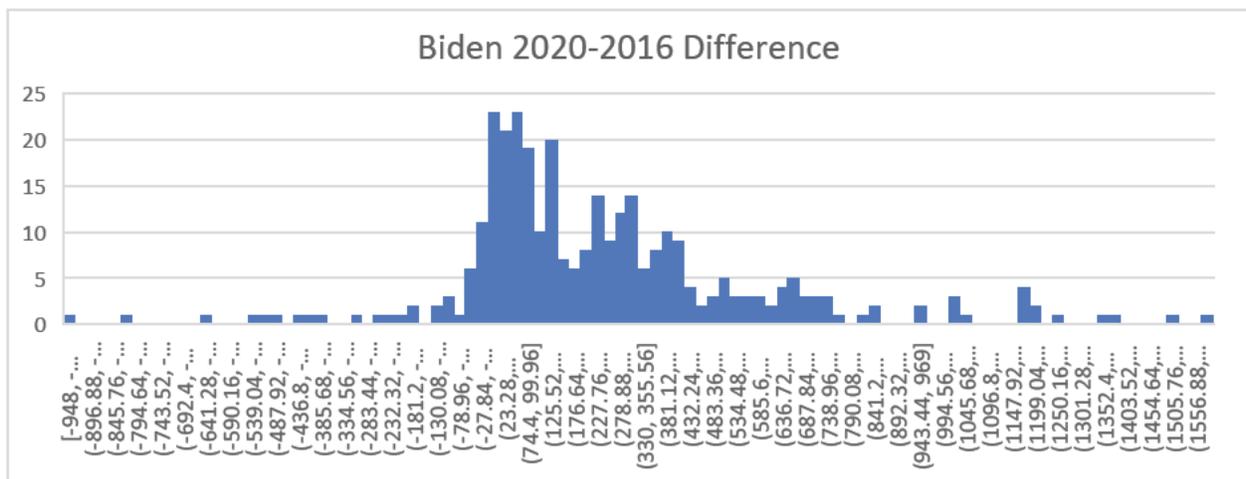
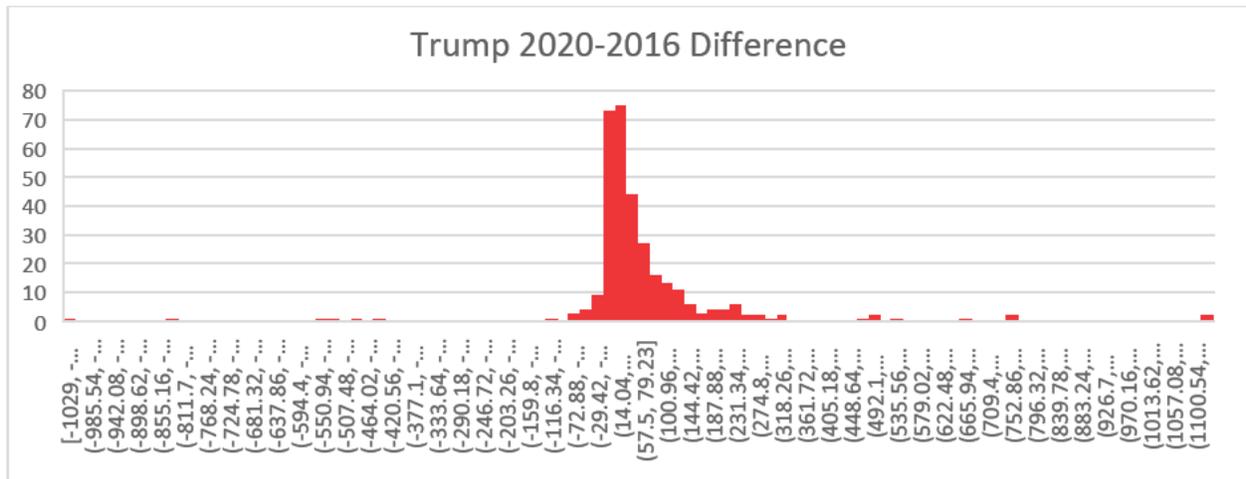
Moreover, all it takes is one or two counties, like Fulton, to become a hotspot for fraud for it to sway the overall election outcome, particularly via Atlanta.

Moreover, as a control group, consider the fact that counties that are on the Northeastern border of Alabama have a much lower increase in Democrat votes for Biden. These counties are comparable given their proximity, making the especially large surge in Georgia more suspect.

There are also many precincts within these counties that have highly suspect numbers. For example, 97% of the votes are for Biden in SC16A (Fulton County) and 97% in Snapfinger Road (DeKalb). Many more examples abound. The distribution is also highly skewed towards Biden: whereas 10% of the precincts have an over 95% Biden vote, none of the precincts have an over 90% Trump vote. Given the historical distribution of votes from 2016, this fact pattern is suspect.

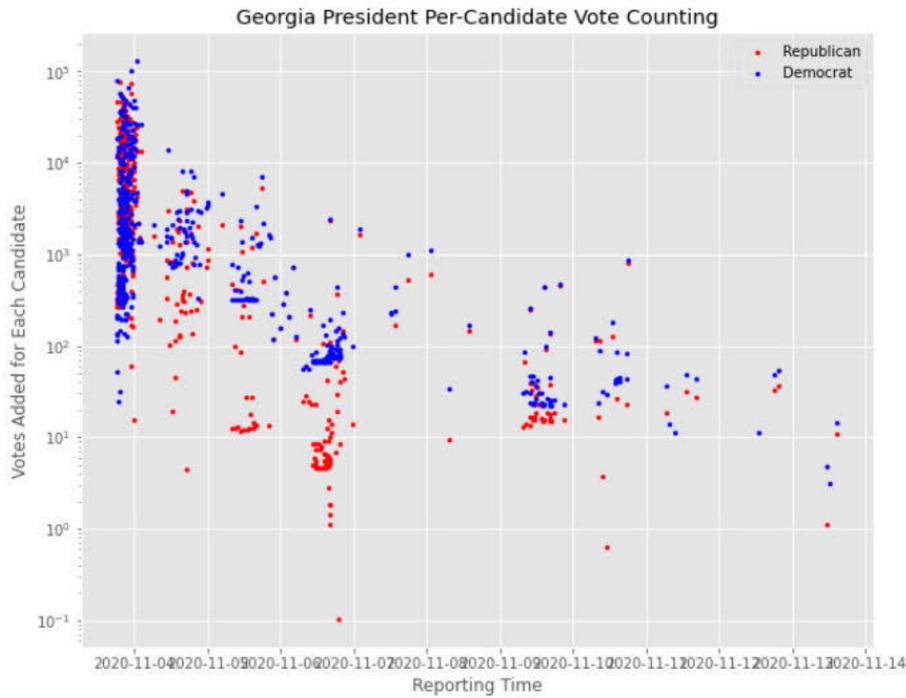
8. One diagnostic for detecting fraud involves Benford's law. In the case of election fraud, that means looking at the distribution of digits across votes within a specified geography. Using precinct level data for Georgia, my research identified 1,017 suspicious precincts out of 2,656 when we look at advance ballots. Even more precincts (1,530) were flagged as suspicious for election day votes. While Benford's law is not a silver-bullet for identifying fraud on its own, it suggests suspicious activity that warrants additional attention.
9. Yet another way of detecting statistical anomalies involves looking at the distribution of the change in 2020 to 2016 vote shares of Trump

and Biden. Whereas the distribution for Trump is perfectly “normal,” the distribution for Biden is non-normal: it is skewed heavily to the right. This is not present in other states that do not have similar concerns about fraudulent activity, but is present in the states with those concerns (e.g., Pennsylvania too).



10. There were many puzzling incidents across states, including Georgia, where surges of votes for Biden were observed at odd hours of the morning of November 4th. In particular, preliminary analysis on the live Edison Research data reveals that new ballots were coming in increasingly more slowly, but they were larger for

Democrats than for Republicans. The combination of the pattern and timing is puzzling, particularly since it is not present in other states, like Florida, that do not have similar concerns about fraud.



I declare under penalty of perjury that the forgoing is true and correct.
Executed this November 16, 2020.

Chris [REDACTED],

CHRIS [REDACTED]