

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF FLORIDA

UNITED SOVEREIGN AMERICANS, INC.
167 Lamp and Lantern Village, Suite 194
Chesterfield, MO 63017

CIVIL ACTION

And

CITIZENS DEFENDING FREEDOM
7901 4th Street, Suite 300
St. Petersburg, FL 33702

Case No. 24-cv-327

And

JEFFREY BUONGIORNO
3851 N. Ocean Blvd. #406
Gulfstream, FL 33483

And

CATHI CHAMBERLAIN
10520 San Ferando Blvd. NE
St. Petersburg, FL 33702

And

GABRIELLE FOX
3330 Fairchild Gardens Ave., #33663
Palm Beach Gardens, FL 33410

And

CHRISTOPHER GLEASON
1628 Sand Keys Estates Court
Clearwater, FL 33767

And

GERRY JAMES
4811 Otter Creek Lane
Ponte Vedra Beach, FL 32082

And

JUDITH JENSEN

22714 NM 191st Lane
High Springs, FL 32643

And

JANE JUSTICE
361 Via Ponciana, #314
Lake Worth, FL 33467

And

MICHAEL PETERS
241 Alameda Ave.
Fort Myers, FL 33905

And

DAVID SCHAFFEL
4344 Montalvo Ct.
Naples, FL 34109

Petitioners,

v.

CORD BYRD, IN HIS OFFICIAL
CAPACITY AS SECRETARY OF THE
STATE OF FLORIDA
500 S. Bronough St.
Tallahassee, FL 32399

And

ASHLEY MOODY, IN HER OFFICIAL
CAPACITY AS ATTORNEY GENERAL OF
THE STATE OF FLORIDA
PL-01, The Capitol
Tallahassee, FL 32399

And

KIM A. BARTON, IN HER OFFICIAL
CAPACITY AS ALACHUA COUNTY
SUPERVISOR OF ELECTIONS
515 N. Main St., Suite 300
Gainesville, FL 32601

And

CHRIS MILTON, IN HIS OFFICIAL
CAPACITY AS BAKER COUNTY
SUPERVISOR OF ELECTIONS
32 n. 5th St., Suite A
Macclenny, FL 32063

And

NINA WARD, IN HER OFFICIAL
CAPACITY AS BAY COUNTY
SUPERVISOR OF ELECTIONS
830 W. 11th St.
Panama City, FL 32401

And

AMANDA SEYFANG, IN HER OFFICIAL
CAPACITY AS BRADFORD COUNTY
SUPERVISOR OF ELECTIONS
P.O. Box 58
Starke, FL 32091

And

TIM BOBANIC, IN HIS OFFICIAL
CAPACITY AS BREVARD COUNTY
SUPERVISOR OF ELECTIONS
2725 Judge Fran Jamieson Way
Building C, Suite 105
Viera, FL 32940

And

JOE SCOTT, IN HIS OFFICIAL CAPACITY
AS BROWARD COUNTY SUPERVISOR
OF ELECTIONS
4650 NW 21st Ave.
Fort Lauderdale, FL 33309

And

MERRICK GARLAND, IN HIS OFFICIAL :
CAPACITY AS ATTORNEY GENERAL OF :
THE UNITED STATES :
950 Pennsylvania Ave NW :
Washington DC 20530 :

And :

SHARON CHASON, :
IN HER OFFICIAL CAPACITY AS :
CALHOUN COUNTY SUPERVISOR OF :
ELECTIONS :
20859 Central Ave. East, Rm 117 :
Blountstown, FL 32424 :

And :

LEAH VALENTI, IN HER OFFICIAL :
CAPACITY AS CHARLOTTE COUNTY :
SUPERVISOR OF ELECTIONS :
226 Taylor Street, Unit 120 :
Punta Gorda, FL 33950 :

And :

MAUREEN "MO" BAIRD, IN HER :
OFFICIAL CAPACITY AS CITRUS :
COUNTY SUPERVISOR OF ELECTIONS :
1500 N. Meadowcrest Blvd. :
Crystal River, FL 34429 :

And :

CHRIS H. CHAMBLESS, IN HIS OFFICIAL :
CAPACITY AS CLAY COUNTY :
SUPERVISOR OF ELECTIONS :
500 N. Orange Ave. :
Green Coe Springs, FL 32043 :

And :

MELISSA R. BLAZIER, IN HER OFFICIAL :
CAPACITY AS COLLIER COUNTY :
SUPERVISOR OF ELECTIONS :
Rev. Dr. Martin Luther King Jr. Building :
3750 Enterprise Avenue :
Naples, FL 34104 :

And

TOMI S. BROWN, IN HER OFFICIAL
CAPACITY AS COLUMBIA COUNTY
SUPERVISOR OF ELECTIONS
971 W. Duval Street, Ste 102
Lake City, FL 32005-3728

And

MARK F. NEGLEY, IN HIS OFFICIAL
CAPACITY AS DESOTO COUNTY
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Arcadia, FL 34266

And

STARLET CANNON, IN HER OFFICIAL
CAPACITY AS DIXIE COUNTY
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Cross City, FL 32628

And

JERRY HOLLAND, IN HIS OFFICIAL
CAPACITY AS DUVAL COUNTY
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And

ROBERT D. BENDER, IN HIS OFFICIAL
CAPACITY AS ESCAMBIA COUNTY
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And

KAITI LENHART, IN HER OFFICIAL
CAPACITY AS FLAGLER COUNTY
SUPERVISOR OF ELECTIONS
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Bunnell, FL 32110

And

HEATHER RILEY, IN HER OFFICIAL
CAPACITY AS FRANKLIN COUNTY
SUPERVISOR OF ELECTIONS
47 Ave F,
Apalachicola, FL 32320

And

SHIRLEY GREEN KNIGHT, IN HER
OFFICIAL CAPACITY AS GADSEN
COUNTY SUPERVISOR OF ELECTIONS
16 South Madison Street
Quincy, FL 32351

And

CONNIE D. SANCHEZ, IN HER OFFICIAL
CAPACITY AS GILCHRIST COUNTY
SUPERVISOR OF ELECTIONS
112 South Main Street, Room 137
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And

ALETRIS FARNAM, IN HER OFFICIAL
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998 US Hwy 27 South
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And

JOHN M. HANLON, IN HIS OFFICIAL
CAPACITY AS GULF COUNTY
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Port St Joe, FL 32456

And

LAURA HUTTO, IN HER OFFICIAL
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And

DIANE SMITH, IN HER OFFICIAL
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131 K.D. Revell Rd.
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And

SHERRY TAYLOR, IN HER OFFICIAL
CAPACITY AS HENDRY COUNTY
SUPERVISOR OF ELECTIONS
25 E. Hickpochee Avenue
LaBelle, FL 33935

And

SHIRLEY ANDERSON, IN HER OFFICIAL
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And

KAREN HEALY, IN HER OFFICIAL
CAPACITY AS HIGHLANDS COUNTY
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580 S Commerce Ave
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And

CRAIG LATIMER, IN HIS OFFICIAL
CAPACITY AS HILLSBOROUGH
COUNTY SUPERVISOR OF ELECTIONS
Robert L. Gilder Elections Service Center
2514 North Falkenburg Rd.
Tampa, FL 33619

And

H. RUSSELL "RUSTY" WILLIAMS, IN
HIS OFFICIAL CAPACITY AS HOLMES
COUNTY SUPERVISOR OF ELECTIONS
201 N. Oklahoma Street, Suite 102
Bonifay, FL 32425

And

LESLIE ROSSWAY SWAN, IN HER
OFFICIAL CAPACITY AS INDIAN RIVER
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And

CAROL A DUNAWAY, IN HER OFFICIAL
CAPACITY AS JACKSON COUNTY
SUPERVISOR OF ELECTIONS
2851 Jefferson Street
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And

MICHELLE MILLIGAN, IN HER
OFFICIAL CAPACITY AS JEFFERSON
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1175 W. Washington St.
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And

TRAVIS HART, IN HIS OFFICIAL
CAPACITY AS LAFAYETTE COUNTY
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:

And

ALAN HAYS, IN HIS OFFICIAL
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And

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And

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And

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And

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And

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And

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And

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And

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And

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And

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And

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And

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And

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And

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And

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And

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And

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And

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And

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And

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And

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And

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CAPACITY AS ST. LUCIE COUNTY
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Fort Pierce, FL 34947

And

WILLIAM "BILL" KEEN, IN HIS
OFFICIAL CAPACITY AS SUMTER
COUNTY SUPERVISOR OF ELECTIONS
7375 Powell Road, Suite #125
Wildwood, FL 34785

And

JENNIFER KINSEY, IN HER OFFICIAL
CAPACITY AS SUWANEE COUNTY
SUPERVISOR OF ELECTIONS
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Live Oak, FL 32064

And

DANA SOUTHERLAND, IN HER
OFFICIAL CAPACITY AS TAYLOR
COUNTY SUPERVISOR OF ELECTIONS
433 US 19 N
Perry Florida, 32347

And

DEBORAH K. OSBORNE, IN HER
OFFICIAL CAPACITY AS UNION
COUNTY SUPERVISOR OF ELECTIONS
175 West Main St.
Lake Butler, FL 32054

And

LISA LEWIS, IN HER OFFICIAL
CAPACITY AS VOLUSIA COUNTY
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And

JOE MORGAN, IN HIS OFFICIAL
CAPACITY AS WAKULLA COUNTY
SUPERVISOR OF ELECTIONS
3115 B Crawfordville Hwy.
Crawfordville, FL 32327

And

RYAN MESSER, IN HIS OFFICIAL
CAPACITY AS WALTON COUNTY
SUPERVISOR OF ELECTIONS
Walton County Courthouse
571 US Hwy 90 East, Suite 102
DeFuniak Springs, FL 32433

And

DEIDRA MALLOY PETTIS, IN HER
OFFICIAL CAPACITY AS WASHINGTON
COUNTY SUPERVISOR OF ELECTIONS
1424 Jackson Ave., Suite C
Chipley, FL 32428

Respondents.

PETITION FOR RELIEF IN THE FORM OF AN AMENDED WRIT OF MANDAMUS¹

TO: The Honorable Judges of Said Court:

Petitioner, United Sovereign Americans, Inc., a Missouri nonprofit corporation also incorporated in Florida as a separate chapter, by counsel, van der Veen, Hartshorn, Levin, & Lindheim, through Bruce L. Castor, Jr., hereby submits this Petition for Relief in the Form of a Writ of *Mandamus*, directed to Respondents Cord Byrd, in his Official Capacity as the Secretary of the State of Florida, Ashley Moody, in her Official Capacity as Attorney General of Florida, Kim A. Barton, in her official capacity as the Supervisor of Elections for Alachua County, Chris Milton, in his official capacity as the Supervisor of Elections for Baker County, Nina Ward, in her official capacity as the Supervisor of Elections for Bay County, Amanda Seyfang, in her official capacity as the Supervisor of Elections for Bradford County, Tim Bobanic, in his official capacity as the Supervisor of Elections for Brevard County, Joe Scott, in his official capacity as the

¹ Petitioners are cognizant of Federal Rule of Civil Procedure 81(b) which abolished mandamus actions in United States District Court, but nonetheless authorizes “relief previously available through [writs of mandamus] by appropriate action or motion under these rules.” F.R.C.P. 81(b). Petitioners herein are seeking relief via the All Writs Act (§ 1361) and an Action to Compel a United States Officer to Perform His/Her Duty (§ 1361).

Supervisor of Elections for Broward County, Sharon Chason, in her official capacity as Supervisor of Elections for Calhoun County, Leah Valenti, in her official capacity as Supervisor of Elections for Charlotte County, Maureen Baird, in her official capacity as Supervisor of Elections for Citrus County, Chris H. Chambless, in his official capacity as Supervisor of Elections for Clay County, Melissa R. Blazier, in her official capacity as Supervisor of Elections for Collier County, Tomi S. Brown, in her official capacity as Supervisor of Elections for Columbia County, Mark F. Negley, in his official capacity as Supervisor of Elections for Desoto County, Starlet Cannon, in her official capacity as Supervisor of Elections for Dixie County, Jerry Holland, in his official capacity as Supervisor of Elections for Duval County, Robert D. Bender, in his official capacity as Supervisor of Elections for Escambia County, Kaiti Lenhart, in her official capacity as Supervisor of Elections for Flagler County, Heather Riley, in her official capacity as Supervisor of Elections for Franklin County, Shirley Green Knight, in her official capacity as Supervisor of Elections for Gadsen County, Connie D. Sanchez, in her official capacity as Supervisor of Elections for Gilchrist County, Aletris Farnam, in her official capacity as Supervisor of Elections for Glades County, John M. Hanlon, in his official capacity as Supervisor of Elections for Gulf County, Laura Hutto, in her official capacity as Supervisor of Elections for Hamilton County, Diane Smith, in her official capacity as Supervisor of Elections for Hardee County, Sherry Taylor, in her official capacity as Supervisor of Elections for Hendry County, Shirley Anderson, in her official capacity as Supervisor of Elections for Hernando County, Karen Healy, in her official capacity as Supervisor of Elections for Highlands County, Craig Latimer, in his official capacity as Supervisor of Elections for Hillsborough County, H. Russell "Rusty" Williams, in his official capacity as Supervisor of Elections for Holmes County, Leslie Rossway Swan, in her official capacity as Supervisor of Elections for Indian River County, Carol A Dunaway, in her official capacity as Supervisor of

Elections for Jackson County, Michelle Milligan, in her official capacity as Supervisor of Elections for Jefferson County, Travis Hart, in his official capacity as Supervisor of Elections for Lafayette County, Alan Hays, in his official capacity as Supervisor of Elections for Lake County, Tommy Doyle, in his official capacity as Supervisor of Elections for Lee County, Mark S. Earley, in his official capacity as Supervisor of Elections for Leon County, Tammy Jones, in her official capacity as Supervisor of Elections for Levy County, Grant Conyers, in his official capacity as Supervisor of Elections for Liberty County, Heath Driggers, in his official capacity as Supervisor of Elections for Madison County, James Satcher, in his official capacity as Supervisor of Elections for Manatee County, Wesley Wilcox in his official capacity as Supervisor of Elections for Marion County, Vicki Davis, in her official capacity as Supervisor of Elections for Martin County, Christina White, in her official capacity as Supervisor of Elections for Miami-Dade County, R. Joyce Griffin, in her official capacity as Supervisor of Elections for Monroe County, Janet T. Adkins, in her official capacity as Supervisor of Elections for Nassau County, Paul Lex, in his official capacity as Supervisor of Elections for Okaloosa County, Glen Gilzean, in his official capacity as Supervisor of Elections for Orange County, Mary Jane Arrington, in her official capacity as Supervisor of elections for Osceola County, Wendy Sartory Link, in her official capacity as Supervisor of Elections for Palm Beach County, Brian E. Corley, in his official capacity as Supervisor of Elections for Pasco County, Julie Marcus, in her official capacity as Supervisor of Elections for Pinellas County, Lori Edwards, in her official capacity as Supervisor of Elections for Polk County, Charles L. Overturf, III, in his official capacity as Supervisor of Elections for Putnam County, Tappie Villane, in her official capacity as Supervisor of Elections for Santa Rose County, Ron Turner, in his official capacity as Supervisor of Elections for Sarasota County, Chris Anderson, in his official capacity as Supervisor of Elections for Seminole County, Vicky Oakes, in her official capacity as

Supervisor of Elections for Johns County, Gertrude Walker, in her official capacity as Supervisor of Elections for St. Lucie County, William “Bill” Keen, in his official capacity as Supervisor of Elections for Sumter County, Jennifer Kinsey, in her official capacity as Supervisor of Elections for Suwanee County, Dana Southerland, in her official capacity as Supervisor of Elections for Taylor County, Deborah Osborne, in her official capacity as Supervisor of Elections for Union County, Lisa Lewis, in her official capacity as Supervisor of Elections for Volusia County, Joe Morgan, in his official capacity as Supervisor of Elections for Wakulla County, Ryan Messer, in his official capacity as Supervisor of Elections for Walton County, Deidra Malloy Pettis, in her official capacity as Supervisor of Elections for Washington County, and Merrick Garland, in his official capacity as Attorney General of the United States.

Respectfully Represents:

Summary of Petitioners’ Argument and Examples of Relief Requested

1. The Congress of the United States has outlined the minimum standards which must be maintained by every state in order for a federal election to be considered reliable. As outlined below, in Florida’s 2022 federal election those minimum standards were not met by State election officials thereby rendering the certified election results that year unreliable. Respondents, in their official capacities, have engaged in insufficient efforts to ensure that the 2022 performance is not repeated in subsequent federal elections beginning in 2026.²

2. If the 2022 election performance is repeated in 2024, Petitioners and all Florida voters will suffer damages going forward.

² As this is an amended complaint and the General Election in 2024 has occurred, *all* relief sought herein is now confined to federal elections occurring *after* 2024, which ordinarily are held in even-numbered years, with the next being in 2026 absent a special election.

3. Apart from Court action in equity, no other mechanism exists in the law for Petitioners to require Respondents to perform their ministerial duties insuring that Florida's federal elections are conducted in conformity with the United States Constitution, Article I, sec. 4 and the law as Congress has set forth.

4. Only this Honorable Court has the power to require Respondents to act to bring the 2026 (and subsequent) federal elections supervised by Florida authorities into conformity with the minimum standards for reliability set by Congress and outlined *infra*.

5. Without the Court's action, Petitioner believes and therefore avers that the 2026 (and subsequent) Florida federal election results will be unreliable for the same reasons, that the 2022 results are unreliable.

6. Petitioners seek this Court's intervention to ensure that only properly registered voters cast votes in combined federal and state elections beginning in 2026.

7. Petitioners seek this Court's intervention to ensure that all votes properly cast are counted *correctly* in combined federal and Florida elections in even numbered years beginning in 2026.

8. Petitioners seek this Court's intervention to ensure that all voting systems are compliant with all critical infrastructure requirements and risk assessments are completed within the actual use context, thereby assuring that every ballot is correctly and uniformly processed, as well as accurately tabulated and secured in combined federal and Florida elections beginning in 2026.

9. Petitioners seek this Court's intervention to ensure that the authenticity of every ballot counted is proven by the maintenance of a comprehensive, unbroken chain of custody from the voter's hand to the final certified result, and the State election officials maintain records of said

chain of custody post-election, in compliance with all legally prescribed safeguards in combined federal and Florida elections beginning in 2026.

10. Petitioners seek this Court's intervention to ensure that combined federal and Florida elections in even numbered years beginning in 2026 are conducted with the transparency required by law.

11. Petitioners seek this Court's intervention to ensure that only votes properly cast are counted in combined federal and Florida elections beginning in 2026.

12. Petitioners seek this Court's intervention clarifying and ordering that the currently accepted Federal definition "to certify" is *to attest that an official measurement is both accurate and the finding of accuracy was reached in a fully compliant manner*, thereby, directing that the "certification of elections" by State election officials of combined federal and Florida elections from 2026 onward constitutes an "attestation," ostensibly under penalty of perjury, by the certifying official(s), that the vote counts are accurate, the cast and counted votes, and the election itself, were all conducted in compliance with applicable federal and state law.

13. Petitioners, upon review of the statutes cited below, believe and therefore aver that federal law specifies what State officials must conform to, *at a minimum*, to properly conduct a combined federal election prior to certifying that election as valid.

14. Petitioners believe and therefore aver that based on the expert analysis below, combined with the various exhibits attached to this petition and incorporated by reference herein, that in the 2022 combined federal and state election, officials of the State of Florida failed to ensure that **safeguards** were in place as mandated by various statutes designed to ensure the integrity of the elections.

15. Petitioners believe and therefore aver the failure by State election officials to know

of and implement the safeguards required by law in 2022 allowed State election officials to certify that election despite analysis showing the election results were *per se* unreliable on account of apparent error rates exceeding those the law permits before Congress considers the results in *any* federal election as unreliable.

16. Petitioners believe and therefore aver that apparent error rates that exceed the maximum error rate allowed by law destroyed the integrity of the 2022 election making full confidence in the accuracy of that election impossible.

17. While Petitioners cannot state with certainty that the 2022 Florida General Election produced “winning” candidates who should not have won. Petitioners believe and therefore aver that Florida officials cannot state with certainty that all “winning” candidates received more votes than their “losing” candidates *because the election itself* was compromised by the State’s failure to conform to the requirements of federal law designed to ensure reliable election results.

18. Petitioners believe and therefore aver that Congress mandated the maximum number of election errors which were permissible in the 2022 combined federal and state elections in the State of Florida (and, indeed, in all states and voting territories).

19. Petitioners aver that an error rate above the maximum permissible rate set by Congress renders an election *uncertifiable* because such results are *per se* unreliable. Nevertheless, Florida state officials certified the 2022 election.

20. Petitioners do not seek relief in this Court in the form of a challenge to the outcome of the 2022 federal election in Florida. Petitioners agree that it is possible that in every federal contested election supervised and certified by the State of Florida in 2022 the “winner” received more votes than the “loser.” Nor do Petitioners cast aspersions on the honor and integrity of state and federal elections officials. Lastly, Petitioners recognize the 2024 General Election, like the

2022 General Election has passed, and Petitioners seek no relief here affecting the certification of the 2024 General Election.

21. Petitioners merely point out, without assigning “blame,” that data provided to Petitioners by the State of Florida demonstrates that the 2022 election exceeded the error rates Congress mandated pursuant to its power under Article I, sec. 4 of the United States Constitution rendering that election unreliable, and, Petitioner contends, ought to have rendered it *uncertifiable*.

22. Petitioners believe and therefore aver, however, that the certification by Florida officials of the 2022 election was done despite *apparent* error rates occurring in that election that exceeded the error rate Congress permits before federal election results can be relied upon as accurate, and in 2022 the State did nothing to investigate those apparent errors before certifying the election.

23. **Petitioners believe and therefore aver that it is reasonable to believe that systemic issues which occurred in the 2022 combined federal and state election in Florida will continue uncorrected in, 2026, 2028, and so forth, absent intervention by this Honorable Court.**

24. Petitioners have called the various issues with the 2022 election to the attention of State officials who failed to take sufficient action to ensure no further repeats of those issues cited here affecting the integrity of the 2022 election.

25. The relief requested by Petitioners in the form of a Writ of *Mandamus* seeks, broadly speaking, this Court to order Respondents to perform the *ministerial* functions their jobs require by taking actions to rectify reliability issues evident in the 2022 election to see they are not repeated in the holding of future federal elections.

**2022 Combined Federal and State Election in Florida Produced Unreliable Results and
Should Not Have Been Certified**

26. In the Help America Vote Act (“HAVA”) 52 U.S.C.A. § 21081, **Congress has mandated as follows: HAVA - voting system error rate “...(5) Error RATES.—The error rate of the voting system in counting ballots (determined by taking into account only those errors which are attributable to the voting system and not attributable to an act of the voter) shall comply with the error rate standards established under section 3.2.1 of the voting systems standards issued by the Federal Election Commission (“FEC”) which are in effect on the date of the enactment of this Act.”**

27. Congress enacted, and President Bush signed HAVA into law, in 2002 and it remains the law of the United States to date.

28. The voting standards of the FEC in effect at the time Congress enacted HAVA in 2002 were the Voting Systems Standards Volume I: Performance Standards (2002).³

29. **Those voting standards in effect at the time HAVA became law allowed for *one error per 500,000 ballot positions*.**

30. Petitioners believe and therefore aver that a federal election that exceeded an error rate of one error per 500,000 *ballot positions* renders such federal election unreliable under HAVA.

31. As the HAVA provision enacted in 2002 cited above has not changed, the error rate of one error per 500,000 *ballot positions* is currently the law of the United States.

32. Petitioners agree that the term “ballot position” is not a term used in everyday

³ As of 2021, there have been five iterations of the national level voting system standards. The Federal Election Commission published the first two sets of federal standards in 1990 and 2002 (VSS1990 and VSS2002). The Election Assistance Commission then adopted Version 1.0 of the Voluntary Voting System Guidelines (VVSG 1.0, or VVSG2005) on December 13, 2005. On March 31, 2015, the EAC commissioners approved VVSG 1.1 (VVSG2015). On February 10, 2021, the EAC approved VVSG 2.0 (VVSG2021).

parlance. To clarify what a “ballot position” means, Petitioners believe and therefore aver that the term “ballot position” refers to the number of individual “choices” a voter could make on a single ballot. For example, if a particular ballot has thirty little circles for the voter to fill-in or not fill-in, that single ballot would be said to contain **thirty** ballot *positions*.

33. Petitioners believe and therefore aver that a *voting system error* occurs anytime the voting scanning machine should have discerned an error (*not* made by the voter) while counting one of those ballot positions on a scanned ballot.

34. Experts working for the EAC have estimated that 500,000 ballot *positions* equals 125,000 *individual ballots*. (See Election Assistance Commission Voluntary Voting System Guidelines of 2015, *U.S. Election Assistance Commission EAC*. United States [Web Archive] Retrieved from the EAC (https://www.eac.gov/sites/default/files/eac_assets/1/28/VVSG.1.1.VOL.1.FINAL1.1.1))

35. Petitioners believe and therefore aver that the EAC desired to clarify the meaning of 500,000 ballot positions in terms of how many individual ballots “make-up” 500,000 ballot positions in order to make easier understanding the election “error rates” permissible by HAVA by giving state election officials an easier metric with which to work in discerning how many errors *at a maximum* are permitted in any given election before that election becomes unreliable and, thus, uncertifiable.

36. Petitioners believe and therefore aver (and will present expert testimony to so substantiate) that the calculation made by the EAC that 500,000 *ballot positions* represents 125,000 *individual ballots* is correct and constitutes a proper interpretation of federal law and Congressional intent under HAVA.

37. In the 2022 Florida General Election, state election officials recorded 7,796,916

individual ballots were cast by the voting public.

38. For the 2022 General Election, then, if 7,796,916 (ballots cast) is divided by 125,000 (because the law allows for one error per 125,000 ballots), that leaves sixty-three (63), rounded up, as the maximum number of errors permitted under federal law for the 2022 election. Only upon a showing of 63 or fewer errors, then, would HAVA permit state election officials to certify the 2022 election as valid.

39. Petitioners believe and therefore aver that if there were more than sixty-three (63) voting system errors in the entire ballot tabulation for all ballots cast in the 2022 election in Florida, the results for that election were unreliable and not properly subject to certification by state officials.

40. Based on information provided by the state itself, upon expert analysis, Florida exceeded this benchmark of sixty-three (63) voting system errors in the 2022 General Election as outlined below.

41. Petitioners believe and therefore aver that contributing to the unreliability of the state's 2022 election is the fact that Florida's voter registration rolls, themselves, contained *hundreds of thousands of potential* errors at the time of the 2022 General Election.

42. These potential errors were in the form of illegal duplicate registrations, voters with invalid or illogical voter history, voters placed in inactive status on questionable authority, backdated registrations, registrations with a modified date prior to registration, invalid or illogical registration dates, age discrepant registrants, and registrants with questionable addresses.

43. Such errors jeopardize the validity of elections throughout the State, bringing doubt as to the accuracy and integrity of the State's currently-in-place voting system, undermining Floridians' collective voting rights, all in violation of existing federal election laws.

44. While Congress may not have specifically intended for these types of errors to be included in the one out of 500,000 error rate, Petitioners believe and therefore aver that this figure provides a general benchmark for what the Legislature considered an acceptable degree of error in our elections.

45. Petitioners seek redress from these voter registration apparent errors, relief from blatantly inaccurate voter registration rolls, relief from discrepancies between votes cast and actual votes reported, and relief from extreme voting errors generally, which collectively and historically amount to violations of federal election laws, and various voting rights encompassed by the United States Constitution.

46. The aforesaid violations of federal and state law have in the past resulted in the certification of election results from provably flawed, inaccurate, and obscure processes outside the view of impartial witnesses or the public, and Respondents have refused collectively to maintain or enforce compliance with federal and state required transparency mandates.

47. Petitioners have brought this issue to the attention of Respondents, who, on information and belief, have done little to address these errors, ensuring future elections will suffer from the same deficiencies.

48. Furthermore, rather than be alarmed by these apparent errors pursuant to prevailing election laws, Respondents instead have collectively ignored the issue of the unreliable election results therefore produced.

49. Petitioners believe and therefore aver Respondents have failed to adequately police and monitor problems with the voter rolls and failed to adequately fix voting registration errors within the state, despite being in the best position to maintain the reliability, integrity, and accuracy of Florida's elections to ensure veracity of the state's election results.

50. Petitioners have repeatedly made good faith and sincere efforts to negotiate and convince Respondents to respond to its concerns.

51. Petitioners have repeatedly shown Respondents Byrd and Garland evidence of potential violations of election law, regarding the conduct of elections by local and state officials charged with administering elections, on behalf of all citizens in accordance with the law.

52. The risk of election subversion is indisputable, but the State has denied Petitioners a fair hearing, despite the serious nature of Petitioners' findings calling into question the reliability, integrity and accuracy of prior federal elections administered by the State.

53. The prayer for relief seeks the protection of Petitioners' rights, as well as those of every voting citizen of the state, to have their vote fairly counted in an open and reliable election as such elections are defined according to law as outlined below.

54. Respondents have denied Petitioners' members their right to a fair vote.

55. Furthermore, Respondents appear to have followed procedures that have obscured the ability to audit the 2022 general election to render the outcomes factually unknowable at the time of certification.

56. Petitioners believe and therefore aver Respondents have repeatedly violated federal law, or negligently allowed such violations to occur, while loudly proclaiming the infallibility of the state's election results.

57. Respondents insist that Petitioners have adequate voting rights, while simultaneously fighting from every conceivable angle to prevent Petitioners from attempting to protect those rights. Respondents' collective actions in refusing to address the problem extinguish and undermine the very meaning of the right to vote in a fair representative democracy.

58. Respondents can and should be compelled to address compliance with existing

election law, specifically compelled to adequately investigate the issue upheld and preserved.

59. The All-Writs Act, 28 U.S.C. § 1651 provides that “[t]he Supreme Court and all courts established by Act of Congress may issue all writs necessary or appropriate in the aid of their respective jurisdictions and agreeable to the usages and principles of law.”

60. District Courts of the United States have original jurisdiction over any action in the nature of *mandamus* to compel an officer or employee of the United States or any agency thereof to perform a duty owed to a plaintiff. 28 U.S.C. § 1361.

Parties

61. United Sovereign Americans, Inc., is a nonprofit corporation incorporated in the state of Missouri.

62. Citizens Defending Freedom is a non-profit organization incorporated in St. Petersburg, Florida and dedicated to voter integrity within the State of Florida.

63. Jeffrey Buongiorno is a Florida resident and candidate for Supervisor of Elections for Palm Beach County, Florida.

64. Cathi Chamberlain is a Florida resident and poll watcher for Pinellas County, Florida.

65. Christopher Gleason is a Florida resident and candidate for Supervisor of Elections for Pinellas County, Florida.

66. Gerry James is a Florida resident and candidate for the Florida Senate for District 7.

67. Judith Jensen is a Florida resident and candidate for Supervisor of Elections for Alachua County, Florida.

68. Jane Justice is a Florida resident and candidate for the Florida House of

Representatives for District 87.

69. Michael Peters is a Florida resident and candidate for Supervisor of Elections for Collier County, Florida.

70. Cord Byrd, in his official capacity as Secretary of the State, was appointed by the Governor to oversee the Department of State. Secretary Byrd and his department are tasked with administering and ensuring the state's compliance with Florida's Election Code, the state's compliance with federal law including HAVA, and the National Voter Registration Act. Secretary Byrd is the Chief Election Official for the State of Florida. Fla. Stat. § 97.012.

71. Merrick Garland, in his official capacity as the Attorney General of the United States, is the chief law enforcement official of the United States, and is responsible for overseeing and managing the Department of Justice of the United States which is a government agency tasked with the enforcement and prosecution of federal law in addition to ensuring that state and federal actors, including those acting in the various states within the United States, are complying with federal law.

72. Kim A. Barton, in her official capacity as the Supervisor of Elections for Alachua County.

73. Chris Milton, in his official capacity as the Supervisor of Elections for Baker County.

74. Nina Ward, in her official capacity as the Supervisor of Elections for Bay County.

75. Amanda Seyfang, in her official capacity as the Supervisor of Elections for Bradford County.

76. Tim Bobanic, in his official capacity as the Supervisor of Elections for Brevard County.

77. Joe Scott, in his official capacity as the Supervisor of Elections for Broward County.
78. Sharon Chason, in her official capacity as Supervisor of Elections for Calhoun County.
79. Leah Valenti, in her official capacity as Supervisor of Elections for Charlotte County.
80. Maureen Baird, in her official capacity as Supervisor of Elections for Citrus County.
81. Chris H. Chambless, in his official capacity as Supervisor of Elections for Clay County.
82. Melissa R. Blazier, in her official capacity as Supervisor of Elections for Collier County.
83. Tomi S. Brown, in her official capacity as Supervisor of Elections for Columbia County.
84. Mark F. Negley, in his official capacity as Supervisor of Elections for Desoto County.
85. Starlet Cannon, in her official capacity as Supervisor of Elections for Dixie County.
86. Jerry Holland, in his official capacity as Supervisor of Elections for Duval County.
87. Robert D. Bender, in his official capacity as Supervisor of Elections for Escambia County.
88. Kaiti Lenhart, in her official capacity as Supervisor of Elections for Flagler County.
89. Heather Riley, in her official capacity as Supervisor of Elections for Franklin County.
90. Shirley Green Knight, in her official capacity as Supervisor of Elections for Gadsen County.

91. Connie D. Sanchez, in her official capacity as Supervisor of Elections for Gilchrist County.

92. Aletris Farnam, in her official capacity as Supervisor of Elections for Glades County.

93. John M. Hanlon, in his official capacity as Supervisor of Elections for Gulf County.

94. Laura Hutto, in her official capacity as Supervisor of Elections for Hamilton County.

95. Diane Smith, in her official capacity as Supervisor of Elections for Hardee County.

96. Sherry Taylor, in her official capacity as Supervisor of Elections for Hendry County.

97. Shirley Anderson, in her official capacity as Supervisor of Elections for Hernando County.

98. Karen Healy, in her official capacity as Supervisor of Elections for Highlands County.

99. Craig Latimer, in his official capacity as Supervisor of Elections for Hillsborough County.

100. H. Russell "Rusty" Williams, in his official capacity as Supervisor of Elections for Holmes County.

101. Leslie Rossway Swan, in her official capacity as Supervisor of Elections for Indian River County.

102. Carol A Dunaway, in her official capacity as Supervisor of Elections for Jackson County.

103. Michelle Milligan, in her official capacity as Supervisor of Elections for Jefferson County.

104. Travis Hart, in his official capacity as Supervisor of Elections for Lafayette County.
105. Alan Hays, in his official capacity as Supervisor of Elections for Lake County.
106. Tommy Doyle, in his official capacity as Supervisor of Elections for Lee County.
107. Mark S. Earley, in his official capacity as Supervisor of Elections for Leon County.
108. Tammy Jones, in her official capacity as Supervisor of Elections for Levy County.
109. Grant Conyers, in his official capacity as Supervisor of Elections for Liberty County.
110. Heath Driggers, in his official capacity as Supervisor of Elections for Madison County.
111. James Satcher, in his official capacity as Supervisor of Elections for Manatee County.
112. Wesley Wilcox in his official capacity as Supervisor of Elections for Marion County.
113. Vicki Davis, in her official capacity as Supervisor of Elections for Martin County.
114. Christina White, in her official capacity as Supervisor of Elections for Miami-Dade County.
115. R. Joyce Griffin, in her official capacity as Supervisor of Elections for Monroe County.
116. Janet T. Adkins, in her official capacity as Supervisor of Elections for Nassau County.
117. Paul Lex, in his official capacity as Supervisor of Elections for Okaloosa County.
118. Glen Gilzean, in his official capacity as Supervisor of Elections for Orange County.
119. Mary Jane Arrington, in her official capacity as Supervisor of elections for Osceola County.

120. Wendy Sartory Link, in her official capacity as Supervisor of Elections for Palm Beach County.

121. Brian E. Corley, in his official capacity as Supervisor of Elections for Pasco County.

122. Julie Marcus, in her official capacity as Supervisor of Elections for Pinellas County.

123. Lori Edwards, in her official capacity as Supervisor of Elections for Polk County.

124. Charles L. Overturf, III, in his official capacity as Supervisor of Elections for Putnam County.

125. Tappie Villane, in her official capacity as Supervisor of Elections for Santa Rose County.

126. Ron Turner, in his official capacity as Supervisor of Elections for Sarasota County.

127. Chris Anderson, in his official capacity as Supervisor of Elections for Seminole County.

128. Vicky Oakes, in her official capacity as Supervisor of Elections for Johns County.

129. Gertrude Walker, in her official capacity as Supervisor of Elections for St. Lucie County.

130. William "Bill" Keen, in his official capacity as Supervisor of Elections for Sumter County.

131. Jennifer Kinsey, in her official capacity as Supervisor of Elections for Suwanee County.

132. Dana Southerland, in her official capacity as Supervisor of Elections for Taylor County.

133. Deborah Osborne, in her official capacity as Supervisor of Elections for Union County.

- 134. Lisa Lewis, in her official capacity as Supervisor of Elections for Volusia County.
- 135. Joe Morgan, in his official capacity as Supervisor of Elections for Wakulla County.
- 136. Ryan Messer, in his official capacity as Supervisor of Elections for Walton County.
- 137. Deidra Malloy Pettis, in her official capacity as Supervisor of Elections for Washington County.

Jurisdiction and Venue

- 138. This Court has jurisdiction pursuant to 28 U.S.C. § 1651.
- 139. This Court has jurisdiction pursuant to 28 U.S.C. § 1361.
- 140. This Court additionally has subject matter jurisdiction over this complaint because the case presents substantial questions of federal law, and the state claims are so related to the federal claims that they form part of the same case or controversy. 28 U.S.C. §§ 1331 and 1367.
- 141. This Court has personal jurisdiction as the Respondents are a collection of Florida agencies and actors, and Florida is within the jurisdiction of the United States.
- 142. "When a state exercises power wholly within the domain of state interest, it is insulated from federal judicial review. But such insulation is not carried over when state power is used as an instrument for circumventing a federally protected right." *Gray v. Sanders*, 372 U.S. 368, 372(1963) (citing *Gomillion v. Lightfoot*, 364 U.S. 339, 347 (1960)).
- 143. Venue is proper in this district under 28 U.S.C. § 1391(e)(1).

Standing

- 144. Petitioners Jeffrey Buongiorno, Cathi Chamberlain, Gabrielle Fox, Christopher Gleason, Gerry James, Judith Jensen, Jane Justice, Michael Peters, and David Schaffel (hereinafter, collectively, "Voter Petitioners") are all registered voters within the State of Florida.
- 145. It is well-settled that any person whose right to vote has been impaired has standing

to sue. *Gray v. Sanders*, 372 U.S. 368, 375 (1963).

146. Florida Division of Elections reported that 7,796,916 votes were cast by Florida residents in the 2022 election. However, based on the raw data produced by Florida election officials, there were only 7,651,607 voters who voted in the 2022 election.

147. As such, Florida's election data presented a "voter-to-vote discrepancy" wherein the Florida Division of Elections certified that 145,309 more votes were cast than voters who participated in the 2022 election.

148. Voter Petitioners believe and therefore aver that this data demonstrates that the weight of each of their respective votes was unjustly diluted by the 145,309 votes of unknown origin.

149. Petitioners Jeffrey Buongiorno, Gabrielle Fox, Christopher Gleason, Gerry James, Judith Jensen, Jane Justice, Michael Peters, and David Schaffel (hereinafter, collectively, "Candidate Petitioners") are all Florida residents actively running for an elected position in the 2024 election.

150. Candidate Petitioners believe and therefore aver that they have invested considerable resources into pursuing their candidacy in the recent 2024 election, and that the voter-to-vote discrepancy creates a reasonable probability that there will be discrepancies in the certification of the 2024 election.

151. The injury to Petitioners and all Florida voters would cease to exist or be greatly relieved should this Court grant Petitioners' requested relief.

152. The Supreme Court has indicated that if one party to a lawsuit has standing, other entities can join as parties without having to independently satisfy the demands of Article III, provided those parties do not seek a distinct form of relief from the party with standing. *See*,

Horne v. Flores, 557 U.S. 433, 446-47 (2009).

153. As such, Petitioners United Sovereign Americans and Citizens Defending Freedom are not required to establish independent standing or organizational standing as they are not seeking distinct relief.

Background

THE CONSTITUTIONALLY PROTECTED RIGHT TO VOTE

154. The United States Constitution grants the people the right to choose representatives to the people of several states, according to the voting eligibility requirements of the state. U.S. Const. art. 1, § 2.

155. The 14th Amendment of the United States Constitution, Section 1, defines a “citizen” as all people born or naturalized in the United States and subject to the jurisdiction thereof.

156. The 14th Amendment of the United States Constitution, Section 2, protects eligible citizen voters against denial or abridgment of their vote.

157. “The very essence of civil liberty certainly consists in the right of every individual to claim the protection of the laws, whenever he receives an injury.” *Marbury v. Madison*, 1 Cranch 137, 5 U. S., 137, 163 (1803).

158. Federal courts regard the right to vote in a fairly conducted election as a constitutionally protected feature of United States citizenship. *Reynolds v. Sims*, 377 U.S. 533, 554-55 (1964).

159. After the 2020 Presidential Election, pervasive discussion reported on by the media focused on the validity of the presidential election results within Florida

160. Discussions and/or litigation in Florida, as well as in other states around the Nation,

centered on whether raw vote totals were accurate, with particular attention focused on the question: if all ballots in dispute were decided, hypothetically, in the favor of one candidate for president over the other, would that have changed the *outcome* of the election in that state?

161. The question concerned whether the recorded vote totals, viewed in the light most favorable to the losing candidate in any given state, could have affected the awarding of electoral votes from said state, which, in turn, might have affected the determination of the “winner” of the elections for president and vice-president in the Electoral College.

162. The media widely reported that no court ruled that, even if all disputed ballots were assumed to have been found to be favorable to the Republican Candidate during the 2020 presidential election, the outcome in any disputed state would not have been affected. Furthermore, there was insufficient evidence produced such that a court could find that the outcome of the election in any disputed state was unreliable.

163. Petitioners do not seek to revisit the results of the 2020 presidential election, nor to re-examine the conclusions drawn by the various courts and media outlets as summarized at averment 159 above.

164. Petitioners posit a different question: ***How many disputed ballots found to be improperly cast in any given federal election may occur before the reliability and integrity of the entire election becomes suspect?*** Petitioners respectfully represent that Congress has answered this very question as outlined further below and Congress’ answer to this question forms much of the basis of the instant Petition.

165. In *In re: Coy*, 127 U.S. 731 (1888), the United States Supreme Court held that Congress had authority under the Constitution’s Necessary and Proper Clause to regulate any activity during a mixed federal/state election that exposed the federal election to potential harm,

whether that harm materialized or not. Coy is still good law. *See, United States v. Slone*, 411 F.3d 643, 647 (6th Cir. 2005); *United States v. Mason*, 673 F.2d 737, 739 (4th Cir. 1982); *United States v. Malmay*, 671 F.2d 869, 874–75 (5th Cir. 1982); *Ex parte Yarborough*, 110 U.S. 651 (1884); *Ex parte Siebold*, 100 U.S. 371 (1880).

166. In *Oregon v. Mitchell*, The Supreme Court stated:

The right to vote is, of course, different in one respect from the other rights in the economic, social, or political field which, as indicated in the Appendix to this opinion, are under the Equal Protection Clause. The right to vote is a civil right deeply embedded in the Constitution. Article I, s 2, provides that the House is composed of members ‘chosen...by the People’ and the electors ‘shall have the Qualifications requisite for Electors of the most numerous Branch of the State Legislature.’ The Seventeenth Amendment states that Senators shall be ‘elected by the people.’ The Fifteenth Amendment speaks of the ‘right of citizens of the United States to vote’—not only in federal but in state elections.

* * *

[T]he right to vote freely for the candidate of one’s choice is of the essence of a democratic society, and any restrictions on that right strike at the heart of representative government. This ‘right to choose, secured by the Constitution,’ *United States v. Classic*, 313 U.S. 299, is a civil right of the highest order. Voting concerns ‘political’ matters; but the right is not ‘political’ in the constitutional sense. Interference with it has given rise to a long and consistent line of decisions by the Court; and the claim has always

been upheld as justiciable.

400 U.S. 112, 138-39 (1970).

167. Justice Harlan also stated the following in his concurring opinion:

[A]s the right in the people of each State to a republican government and to choose their Representatives in Congress is of the guarantees of the Constitution, by this amendment a remedy might be given directly for a case supposed by *Madison*, where treason might change a State government from a republican to a despotic government, and thereby deny suffrage to the people.

Mitchell, 400 U.S. at 185 (Harlan, J., concurring in part).

168. The Supreme Court of the United States further stated: “we are cautioned about the dangers of entering into political thickets and mathematical quagmires. Our answer is this: a denial of constitutionally protected rights demands judicial protection; our oath and our office require no less of us.” *Reynolds v Sims*, 377 U.S. 533, 566 (1964).

169. “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) (emphasis added).

NATIONAL VOTER REGISTRATION ACT (“NVRA”)

170. The National Voter Registration Act (“NVRA”) was passed for the purpose of ensuring accurate and current voter registration rolls to enhance the integrity of elections.

171. In so doing, Congress found that: “(1) the right of citizens of the United States to vote is a fundamental right; (2) it is the duty of the Federal, State, and local governments to promote

the exercise of that right; and (3) discriminatory and unfair registration laws and procedures can have a direct and damaging effect on voter participation in elections for Federal office and disproportionately harm voter participation by various groups, including racial minorities.” 52 U.S.C. § 20501(a).

172. The NVRA exists in part to “protect the integrity of the electoral process” and “to ensure that accurate and current voter registration rolls are maintained.” 52 U.S.C.A. § 20501(b).

173. The NVRA *requires* States to “conduct a general program that makes a reasonable effort to remove the names of ineligible voters from the official lists of eligible voters” by reason of death or change of address. 52 U.S.C. § 20507(a)(4).

174. Federal regulations require states to provide data to the EAC for use in their reports, including the numbers of active voters, and the numbers of registered voters removed from the rolls for any reason. 11 C.F.R. § 9428.7(b)(1), (2), (5).

175. The NVRA requires the States to complete any program the purpose of which is to remove ineligible voters from the official lists of eligible voters not later than ninety (90) days prior to an election. 52 U.S.C. §20507(b)(2)(A).

176. NVRA has two (2) methods of enforcement. First, the Attorney General can petition the court for declaratory and injunctive relief. 52 U.S.C. §20510(a). Second, a private citizen can pursue a cause of action with certain requirements as follows. 52 U.S.C. §20510(b).

177. In a private action, notice is required, in that a person must notify the chief election official of the State involved. 52 U.S.C. §20510(b)(1). If the violation is not corrected within 90 days of receipt of the notice or within 20 days after receipt of the notice, if the violation occurred within 120 days before the date of an election for office, the aggrieved person may bring a civil action in an appropriate district court seeking relief. 52 U.S.C. §20510(b)(2). In the alternative, if

the violation occurs 30 days before the date of an election for federal office, no notice is required. 52 U.S.C. §20510(b)(3).

178. Although the NVRA authorizes a private cause of action in the form of declaratory or injunctive relief, this “remedy” is largely toothless. Any Court in the United States would have great reluctance to formally order election officials to correct the NVRA error and/or decertify an election so close in time to an actual election or just after certification, and Petitioners do not seek that here for 2022 or 2024.

179. Additionally, to what extent the NVRA requires a hypothetical plaintiff to have suffered injury is not clear – standing could be a troublesome burden to prove particularly if the harm, such as voter fraud and dilution, has been committed on a class people, the electors as a whole, rather than on an individual person.

180. Furthermore, respondents might be tempted to try and convince the Court could apply the doctrine of laches to avoid the distasteful task of questioning election officials, inquiring into potentially fraudulent elections, and inaccurate voting rolls, despite a hypothetical plaintiff being in full compliance with the private NVRA notice requirements.

181. Congress’s power to pass the NVRA comes from Article I, Section 8, Clause 18 of the United States Constitution, the Necessary and Proper Clause, making accurate voter rolls a requirement to uphold the right of the people to choose their representatives.

HELP AMERICANS VOTE ACT (“HAVA”)

182. The Help America Vote Act (“HAVA”) exists in part to “establish minimum election administration standards for States and units of local government with responsibility for the administration of Federal elections, and other purposes.” HELP AMERICA VOTE ACT OF 2002, PL 107–252, Oct. 9, 2002, 116 Stat 1666.

183. HAVA requires that voter roll databases contain only the registrations of legally registered voters residing in that state. 52 US.C.A. § 21083(a).

184. HAVA defines a voting system as “the total combination of mechanical, electromechanical, or electronic equipment (including software, firmware, and documentation required to program, control, and support the equipment) that is used to define ballots; to cast and count votes; to report or display election results; and to maintain and produce any audit trail information.” 52 US.C.A. § 21081(b)(1).

185. The purpose of any voting system is to accurately record, store, consolidate, and report the specific selections, and absence of selections, made by the voter as well as to accurately measure the intent of the total body of eligible voters that voted.

186. HAVA furthermore requires that federal elections adhere to an accuracy standard, “...set at a sufficiently stringent level such that the likelihood of voting system errors affecting the outcome of an election is exceptionally remote even in the closest of elections.” United States (2002) *U.S. Federal Election Commission FEC*. United States [Web Archive] Retrieved from the Election Assistance Commission, https://www.eac.gov/sites/default/files/eac_assets/1/28/Voting_System_Standards_Volume_I.pdf (emphasis added).

187. Accuracy in a voting system is defined as the ability of the system to capture the intent of voters without error. United States. (2002) *U.S. Federal Election Commission FEC*. United States [Web Archive] Retrieved from the Election Assistance Commission, https://www.eac.gov/sites/default/files/eac_assets/1/28/Voting_System_Standards_Volume_I.pdf

188. Petitioners ask this Court to recall that the maximum acceptable error rate established by HAVA for these voting systems of 1 in 125,000 ballots, which Petitioners contend

demonstrates the stringent standards with which Congress intended to hold the accuracy of our elections. 52 U.S.C. §21081(a)(5).

189. Per HAVA, in any given state, each qualified voter is granted a unique statewide identifier in a database, which averts the risk of double-voting or extra ballots being cast in the name of one individual voter.

190. HAVA also requires that states who receive payments for the administration of elections must use the funds “in a manner consistent with each of the laws described in Section 21145 . . . and the proposed uses are not inconsistent with the requirements of Title III.” 52 U.S.C. § 20971(c).

191. A *private cause of action*, as sought here, may exist for HAVA through 42 U.S.C. § 1983. *Colon-Marreror v. Velez*, 813 F.3d 1, 22 (1st Cir. 2016) (finding a private action under 1983 for HAVA violations because the provision provided enforceable voting rights and imposes binding obligations on state officials).

192. §1983 provides a mechanism for enforcing individual rights secured elsewhere as in rights independently secured by the Constitution and laws of the United States. *Gonzaga University v. Doe*, 536 U.S. 273 (2002). Importantly, a §1983 plaintiff must assert a violation of a federal right, not just a law. *Blessing v. Freestone*, 520 U.S. 329 (1997).

193. Petitioners believe and therefore aver voting and having that vote counted equally to all other properly cast votes by only correctly registered voters is a federal right under *Blessing*.

194. The private cause of action pursuant to §1983, and sought here, can be found for violations of HAVA Section 301, which requires voting systems to provide the voter with the opportunity to change the ballot or correct any apparent error before the ballot is cast and

counted. 52 USC 21081(a)(1)(A)(ii). Improper configuration of the voting machines by state election officials would constitute the violation.

195. §1983 is currently the only mechanism where HAVA violations will receive any meaningful privately initiated judicial review, yet it has proven thus far to be ineffectual at providing any real remedy for such violations.

196. Congress's power to pass the HAVA comes from Article I, Section 8, Clause 18 of the United States Constitution, the Necessary and Proper Clause, making accurate voting systems a requirement to uphold the right of the people to choose their representatives.

ELECTION FRUAD CONGRESS SOUGHT TO GUARD AGAINST

197. Petitioners do not accuse any person or entity of engaging in election fraud in 2022, or 2024 nor in subsequent federal elections in Florida. Petitioners' purpose in describing types of voter fraud is to set forth the harms Congress sought to avoid by implementation of HAVA and NVRA.

198. Petitioners believe and therefore aver election fraud can occur in multiple diverse ways, not all of which are individualized to a specific actor.

199. Petitioners believe and therefore aver over the past fifty years, Congress has enacted criminal laws with broad jurisdictional basis to combat false voter registrations, vote-buying, multiple-voting, and fraudulent voting in elections in which a federal candidate is on the ballot. See, 52 U.S.C. §§ 10307(c), 10307(e), 20511.

200. The federal jurisdictional predicate underlying these statutes is satisfied as long as either the name of a federal candidate is on the ballot, or the fraud involves corruption of the voter registration process in a state where one registers to vote simultaneously for federal as well as other offices. *Slone*, 411 F.3d at 647–48; *United States v. McCranie*, 169 F.3d 723, 727 (11th Cir.

1999).

201. Voting in federal elections for individuals who do not personally participate in, and assent to, the voting act attributed to them, or impersonating voters, or casting ballots in the names of voters who do not vote in federal elections, can constitute prosecutable election fraud. *See*, 52 U.S.C. §§ 10307(c); 10307(e); 20511(2).

202. It is *possible* for election officials acting “under color of law” to commit election fraud by performing acts such as diluting ballots with invalid ones (ballot stuffing), rendering false tabulations of votes, or preventing valid voter registrations or votes from being given effect in any election, federal or non-federal (18 U.S.C. §§ 241, 242), as well as in elections in which federal candidates are on the ballot. *See* 52 U.S.C. §§ 10307(c), 10307(e), 20511(2).⁴

203. An individual commits election fraud by submitting fictitious names to election officers for inclusion on voter registration rolls, thereby qualifying the fictitious name to vote in federal elections. 52 U.S.C. §§ 10307(c), 20511(2).

204. An individual commits election fraud by knowingly procuring eligibility to vote for federal office by people who are not entitled to vote under applicable state law and/or people who are not United States Citizens. 52 U.S.C. §§ 10307(c), 20511(2); 18 U.S.C. § 1015(f).

205. An individual who makes a false claim of United States Citizenship to register to vote commits election fraud. 18 U.S.C. § 1015(f); 18 U.S.C. § 911.

206. A person who provides false information concerning a person’s name, address, or period of residence in a voting district to establish voting eligibility commits election fraud. 52

⁴ For purposes of the present Petition, Petitioners do not suggest any Florida election officials engaged in election fraud in 2022 and 2024. Rather, Petitioners’ point out the *possibility* of improper conduct by election officials as a harm against which Congress and the General Assembly have sought to guard by enacting the various statutes cited here. A reason Congress, especially in HAVA, set forth standards that must be met before an election is considered reliable is to counter potential election fraud and to thus produce presumptively reliable election results.

U.S.C. §§ 10307(c), 20511(2).

207. Fraud can occur where an individual causes the production of voter registrations that qualify alleged voters to vote for federal candidates, where that individual knows the registrations are materially defective under applicable state law. 52 U.S.C. § 20511(2)

208. However, election fraud need not involve the participation of individual voters.

209. Election fraud can occur where an individual or organization places fictitious names on voter rolls (allowing for fraudulent ballots which can later be used to stuff the ballot box, *supra.*), casting fake ballots in the names of people who did not vote, obtaining and marking absentee ballots without the input of the voter involved, and falsifying vote tallies.

210. When the federal government seeks to maintain the integrity of elections, it does so for specific federal interests *inter alia*: (1) the protection of the voting rights of racial, ethnic, or language minorities, a specific constitutional right; (2) the registration of voters to vote in federal elections; (3) the standardization and procurement of voting equipment purchased with federal funds; (4) the protection of the federal election process against corruption; (5) the protection of the voting process from corruption accomplished under color of law; and (6) the oversight of non-citizen and other voting by persons ineligible to vote under applicable state law. Richard C. Pilger, *Federal Prosecution of Election Offenses*, p. 30, 8th Edition (2017).

211. Congress has enacted a litany of specific crimes that can be prosecuted under a general definition as “election fraud”:

- a) Conspiracy Against Rights: 18 U.S.C. § 241. *See United States v. Saylor*, 322 U.S. 385 (1944) (stuffing a ballot box with forged ballots); *United States v. Classic*, 313 U.S. 299 (1941) (preventing the official count of ballots in primary elections); *United States v. Townsley*, 843 F.2d 1070, 1073–75 (8th Cir. 1988)

(destroying ballots); *United States v. Morado*, 454 F.2d 167, 171 (5th Cir. 1972) (casting absentee ballots in elderly or handicapped peoples' names); *Crolich v. United States*, 196 F.2d 879, 879 (5th Cir. 1952) (impersonating qualified voters); *United States v. Colvin*, 353 F.3d 569, 576 (7th Cir. 2003) (conspiracy need not be successful nor need there be an overt act).

- b) Deprivation of Rights under Color of Law: 18 U.S.C. § 242. *See United States v. Price*, 383 U.S. 787 (1966) (acted jointly with state agents); *Williams v. United States*, 341 U.S. 97 (1951) (actions clothed under Color of State Law).
- c) False Information in, and Payments for, Registering and Voting: 52 U.S.C. § 10307(c).⁵
- d) Voting More than Once: 52 U.S.C. § 10307(e).
- e) Fraudulent Registration or Voting: 52 U.S.C. § 20511(2).
- f) False claims to Register or Vote: 18 U.S.C. § 1015(f).
- g) "Cost-of-Election" theory: 18 U.S.C. § 1341.
- h) Improper Retention of Federal Election Returns: 52 U.S.C. § 20701.

212. In short, election fraud can constitute numerous different actions or inactions, and federal and state governments of the United States have an interest in guarding the integrity of elections, and ensuring election fraud is stopped, then prosecuted appropriately.

Facts and Summary of the Issues

213. Petitioner United Sovereign Americans received Florida's voter registration data from the 2022 general election – the data contained millions of entries of voter registration data.

214. Thereafter, expert data analysts acting on behalf of Petitioner United Sovereign

⁵ "Section 10307(c) protects two distinct aspects of a federal election: the actual results of the election, and the integrity of the process of electing federal officials." *United States v. Cole*, 41 F.3d 303, 307 (7th Cir. 1994).

Americans performed a series of SQL database queries on the data to extrapolate and refine information about voter registrations in the Commonwealth. See Exhibit “A” for a copy of the SQL Database Queries.

215. Thereafter, Petitioner United Sovereign Americans thoroughly reviewed the results and expert opinions.

216. United Sovereign Americans’ SQL database queries revealed hundreds of thousands of apparent voter registration errors in the State of Florida.

217. The results from the SQL database queries allowed Petitioners’ experts to produce a “Scorecard” reflecting Florida’s voter registration data detailing *the hundreds of thousands* of apparent errors contained within that registration data. See Exhibit “B” for a copy of United Sovereign American’s Florida 2022 General Election Validity Scorecard.

218. In addition, the results from the SQL Database Queries of Florida’s voter registration data allowed Petitioners’ experts to compile a General Election Validity Reconciliation. See Exhibit “C” for a copy of United Sovereign American’s Florida 2022 General Election Validity Reconciliation.

219. The results from the SQL Database Queries of Florida’s voter registration data also revealed that apparent errors were not uniform across Florida – some counties had far more registration apparent errors than others. See Exhibit “D” for a copy of United Sovereign American’s Florida 2022 General Election county-by-county breakdown.

220. According to the data provided to Petitioners United Sovereign Americans for the 2022 election, Florida had 15,742,645 voter registrations.

VOTER REGISTRATION ROLL INACCURACY

221. Expert analysis by Petitioner of the official Florida State Voter Registration Data

for the 2022 election revealed that, out of 15,742,645 voter registrations, there was a total of **564,732** voter registration violations including:

- a. 270,804 registrations had invalid addresses;
- b. 11,819 registrations were from a single family home with 10-15 people registered to it;
- c. 10,988 registrations were from a single apartment or lot with 6-89 people registered to it;
- d. 17,096 registrations were illegal duplicates;
- e. 157,960 registrations were inactive with 8 or more years without voting;
- f. 41,336 registrations were registered while voter rolls were closed for the 2022 General Election;
- g. 439 registrations were backdated;
- h. 887 registrations were for individuals older than 110 (the age of Florida's oldest known person);
- i. 507 individuals were registered to vote before the age of 16;
- j. 19,771 individuals were registered to vote on a Sunday;
- k. 20,213 individuals were registered to vote on a federal holiday;
- l. 12,912 voter registrations contained an invalid name.

See, Exhibit "B."

222. This data shows that in 2022 the voter rolls in Florida were not accurate and current as required by NVRA and HAVA, nor in conformity with specific Florida laws pertaining to voter registration. 52 U.S.C.A. § 20501(b)(4); 52 U.S.C.A. § 21081; and Fla. Stat. § 97.012.

223. Petitioners sought to have, in advance of the 2024 general election, these issues

corrected. Petitioners continued into 2024 to seek redress and repair for these egregious violations through normal democratic means and seek court assistance in addressing these concerns for the next federal election in 2026.

224. Respondents have dismissed, and continue to dismiss, Petitioners' concerns and, based on information and belief, did so without any meaningful review, action, or response.

225. Petitioners expect Respondents to administer and ultimately certify Florida's 2024 general election. However, subsequent federal elections (involving both state and federal contests) using the same inaccurate and flawed data and conditions are likely to occur.

VOTES FROM INELIGIBLE VOTERS

226. Expert analysis on behalf of Petitioners of the official Florida State Voter Registration Data for the 2022 election revealed that, out of the votes cast in the 2022 general election, there were a total of **208,204** evident voting violations, and **205,750** *unique* votes impacted by apparent voting violations.⁶ These violations were in the form of:

- a) 77,063 voters had an invalid or incomplete address on their voter registrations;
- b) 3,042 voters had 10-15 voters registered at a single family home;
- c) 2,470 voters had 6-89 voters registered in a single apartment or lot;
- d) 6,867 voters had illegal duplicate registrations;
- e) 1,724 voters with double or more votes had illegal duplicate registrations;
- f) 51 voters registered after the 2022 General Election cutoff date – but still voted;
- g) 208 voters had backdated registrations;
- h) 3 voters were registered as being older than 110 (the age of Florida's oldest known person);

⁶ Some registered voters have more than one violation. The number of unique voters indicates how many individual registrations have apparent errors – whether it be one or multiple apparent errors.

- i) 10,132 voters were registered on a Sunday;
- j) 12,207 voters were registered on a federal holiday;
- k) 7,844 voters had registrations with invalid names;
- l) 88,635 voters reported blank ballots;
- m) 42 voters voted twice.

See, Exhibit “B.”

227. Petitioners believe and therefore aver this data shows that in 2022, the voter rolls in Florida were not accurate and current as required by the NVRA and HAVA. 52 U.S.C.A. § 20501(b)(4); 52 U.S.C.A. § 21081.

228. Petitioners sought in advance of the 2024 general election to have these issues, and all issues raised herein, addressed and remedied. Petitioners continued in 2024 to seek redress and repair for these egregious violations through democratic means and seek court assistance for subsequently occurring federal elections.

ERROR RATES IN 2022 COMPARED TO RATES PERMITTED BY FEDERAL LAW

229. Florida’s voting systems are subject to the permissible error rates set forth by Congress in HAVA and further elucidated by the FEC Voting System Standards 3.2.1 and explained in the VVSG. *Supra*.

230. The *maximum* number of apparent voting system errors permissible in the electronic counting votes in the 2022 Florida General Election using the calculations set forth by the Federal Election Commission upon mandate by Congress was sixty-three (63) errors at most allowed.

231. The official canvas for the 2022 Florida Election was 7,651,607 ballots cast, yet the data shows there exist 7,796,916 total votes cast – a discrepancy of 145,309 votes. *See* Exhibit

“B.”

232. This discrepancy can best be defined as a Voter-to-Vote deficit.

233. Additionally, the official canvas for the 2022 Florida Election was 7,796,916 votes (ballots counted) yet there exist only 7,651,607 *voters who actually voted* according to the data provided – a discrepancy of 145,309 votes that Florida election officials cannot explain or account for—a number far in excess of sixty-three (63) and indisputably each constitutes an “error.”

234. Petitioners believe and therefore aver that the **145,309 more votes counted than voters who voted** means that either tabulators overcounted votes statewide, the voting machines malfunctioned (or a combination of both), or there is an alternative source of the data discrepancy.⁷

FLORIDA’S 2022 GENERAL ELECTION VALIDITY

235. For Florida’s 2022 General Election, out of the 15,742,645 total registrations, of which Petitioners believe and therefore aver, there were 15,176,814 *valid* registrations, 114,266 uncertain/illogical/invalid registrations, 293,605 registrations which violated election laws, and 157,960 “Deadwood” registrations.⁸ See Exhibit “C.”

236. Petitioners believe and therefore aver that of the people holding the 15,176,814 valid registrations, 7,573,512 votes were counted in the 2022 General Election.

237. Petitioners believe and therefore aver that of the identified 114,266 uncertain/illogical/invalid registrations, **39,946 people voted** and had their votes *counted* in the

⁷ Petitioners accuse no one of engaging in fraud or deceit. Petitioners merely point out the discrepancy, which could be due to unintentional tabulator error, fraud of unknown origin, a combination of both, or even fraud by the tabulators themselves. The discrepancy occurred in 2022 for an unknown reason. It is the deficit *itself*, **regardless of the cause**, demonstrates an error rate in excess of that permitted by HAVA calling into question the integrity of the election. Petitioners propose to ask this Court to order Respondents to ascertain why the deficit occurred in 2022, ensure that a similar deficit does not re-occur in 2026 (as it is now too late for 2024), and in all federal elections thereafter in the future.

⁸ “Deadwood” is a concept dealing with election fraud and is defined as a fake voter registration record. These registrations could include a voter who is deceased, ineligible, moved, etc.

2022 General Election, each of which Florida election officials should have confirmed eligibility to vote before counting that vote and Petitioners avers such officials did not, nor did any law enforcement agency conduct an investigation to determine the cause for said irregularities.

238. Petitioners believe and therefore aver that of the total of 293,605 registrations that violated election laws in one way or another, **38,149** people holding such registrations *cast votes that were counted* in the 2022 General Election, each of which Florida election officials should have confirmed eligibility to vote before counting that vote and Petitioners aver such officials did not, nor did any law enforcement agency conduct an investigation to determine the cause for said irregularities .

239. Petitioners believe and therefore aver that while none of the 157,960 “Deadwood” registrations, or fake name registrations, are listed as having voted in the 2022 General Election, those registrations exist, and thus unscrupulous persons *could* utilize them to fraudulently cast votes in future elections.

240. Petitioners believe and therefore aver that the *registration* error rate in Florida for the 2022 General Election was **two-and-eighty-six-hundredths (2.86%)** of the total registrations on the state’s voter rolls. This figure is arrived at by taking 114,266 uncertain/illogical/invalid registrations, plus 293,605 registrations which violated election laws, as a percentage of 15,742,645 total registrations.

241. Petitioners believe and therefore aver that the *voter* system error rate in Florida for the 2022 General Election was **three-and-forty-nine-hundredths (3.49%)**, arrived at by taking 39,946 votes counted from uncertain/illogical/invalid registrations, plus 38,149 votes counted from illegal registrations, as a percentage of 7,651,607 votes cast.

Requested Relief

ALL WRITS ACT RELIEF – 28 U.S.C. § 1651

242. Petitioners incorporate the previous paragraphs by reference as if set forth at length here.

243. Petitioners are not seeking to undermine official elections results previously certified, nor those about to be certified in 2024. Petitioners have cited issues in prior Florida federal elections to add weight to Petitioners' belief that absent intervention by this Honorable Court, Respondents will permit the same apparent errors to occur in the 2026 General Election(s) in Florida, and in all following federal elections in the State.

244. Petitioners seek redress from the constitutional harm brought upon them, and the Florida electorate at large, by Respondents' failure to comply with federal election law.

245. Petitioners believe and therefore aver that Respondents have done nothing, or an inadequate job, addressing the issues presented in this Petition – particularly to address the inaccurate and likely fraudulent voter rolls and voter systems used in federal elections conducted by state authorities.

246. Respondents' inaction and/or failure to act compels Petitioner to ask the Court to issue a Writ of *Mandamus* requiring Respondents to comply with the two federal statutes at issue (the NVRA and the HAVA), while giving Respondents a reasonable time within which to bring Florida into compliance in time for the 2026 General Election and all federal elections conducted by the state going forward, while providing interim relief to 2026 voters if, upon showing by Respondents, that bringing the state into compliance in time is impossible.

247. Specifically, Petitioners respectfully seek the Court to order Respondents take steps, both short term and long term, to ensure the apparent errors made during the 2022 elections do not recur, and to bring the State into compliance with HAVA's specific mandate of no greater

than 1 voting error out of 125,000 votes in 2024 and subsequent federal general elections in Florida.

248. Petitioners further request this Honorable Court order the state, and any subdivision thereof responsible for voter registrations, submit voter registration requests (and any existing registrations reasonably in question) to the Department of Homeland Security to verify the citizenship or immigration status of persons seeking registration to vote or who are presently on the state's voter rolls whenever there exist any reliable indicators that an applicant or registered voter may not be a U.S. citizen. (see: 8 U.S.C. secs.1644 & 1373(c))

249. This Honorable Court is authorized to issue a writ of *mandamus* under “The All-Writs Act,” 28 U.S.C. § 1651 granting the power to United States Federal Courts to “issue all writs necessary or appropriate in the aid of their respective jurisdictions and agreeable to the usages and principles of law.”

250. A writ of *mandamus* under 28 USC § 1651 is typically used to fill gaps in the law, and the Supreme Court has stated that The All-Writs Act is a “legislatively approved source of procedural instruments designed to achieve ‘the rational ends of the law.’” *Harris v. Nelson*, 394 U.S. 286 (1969) (All Writs Act *mandamus* properly used to conduct factual inquiries).

251. A writ of *mandamus* is warranted where “(1) no other adequate means exist to attain the relief, (2) the party's right to issuance of the writ is clear and indisputable, and (3) the writ is appropriate under the circumstances.” *Hollingsworth v. Perry*, 558 U.S. 183, 190 (2010) (quoting *Cheney v. United States Dist. Ct.*, 542 U.S. 367, 380–81 (2004) (stay granted where district court likely did not follow federal law)).

252. A writ of *mandamus* is appropriate and necessary to vindicate the rights of citizens when a governmental agency or official has refused to perform a ministerial duty that Petitioners

have established has a clear legal right to have the governmental agency or officials, in this case Respondents, perform.

253. A federal court may use all auxiliary writs as aids when it is “calculated in [the court’s] sound judgment to achieve the ends of justice entrusted to it.” *Adams v. United States*, 317 U.S. 269, 273 (1942) (writ of *habeas corpus* is available to the circuit courts of appeals).

254. A “ministerial action” is a duty in a particular situation so plainly prescribed as to be free from doubt and equivalent to a positive command. *Wilbur v. United States*, 281 U.S. 206, 218 (1930); *see also Will v. United States*, 389 U.S. 90 (1967).

255. “Mandamus is employed to compel the performance, when refused, of a ministerial duty . . . [i]t also is employed to compel action, when refused, in matters involving judgment and discretion, but not to direct the exercise of judgment or discretion in a particular way nor to direct the retraction or reversal of action already taken in the exercise of either.” *Wilbur v. United States*, 281 U.S. 206, 218 (1930). *See also Decatur v. Paulding*, 39 U.S. 497, 514-17 (1840) (Secretary of the Navy’s duty to approve of pensions was discretionary, and therefore, not ministerial); *Kendall v. United States*, 37 U.S. 524 (1838) (Postmaster General had a ministerial duty to make entries); *Work v. Rives*, 267 U.S. 175, 177 (1925).

256. Instantly, Petitioners have no other remedy apart from a writ of *mandamus*.

257. Petitioners argue that injunctive and/or declaratory relief is inapplicable or appropriate in this matter because the harm from the 2024 election is not yet realized and Petitioners are seeking prospectively beginning in 2026 to have Florida election officials and/or federal officials bring the State into compliance with federal and state law, specifically HAVA and NVRA, absent a specific existing private cause of action Petitioners could assert that affords Petitioners relief.

258. Petitioners believe and therefore aver and assert private causes of action to enforce federal and state law where Respondents have allowed, and continue to allow, violations of federal election laws, the United States Constitution, and federal civil rights laws pertaining to voter rights, which include mandating accurate registration rolls, transparency, compliance, and proper certification of the voting systems. 52 U.S.C. § 20501; 52 U.S.C. § 21083.

259. Petitioners believe and therefore aver that the voter rolls within the State of Florida are inaccurate, in violation of NVRA and HAVA. These are not list maintenance failures. The inaccuracies represent a failure to control the process of validating and registering only qualified citizen voters. Persons possessing apparently invalid and/or illegal registrations voted in large numbers in Florida's 2022 General Election.

260. Petitioners believe and therefore aver the Respondents have lost control of voter registration, leading to the distribution of ballots to what appear to be false registrants which results in a diluted vote to all voters including Petitioners, harming the electorate at large. The voter-to-vote deficit is illustrative here in that the official canvas for the 2022 Florida Election was 7,796,916 votes counted when there exist 7,651,607 total ballots cast in the data – a discrepancy of 145,309 votes and the State has no idea whether this discrepancy resulted from machine error not attributable to the voter, errors by human beings responsible for the tabulation, a combination of both, or by some other explanation including fraud.

261. *Petitioners believe and therefore aver that HAVA allowed just 63 errors in the 2022 electronic voting systems not attributable to the voter and it defies logic that of the 145,309 “extra” vote counted beyond the number of ballots cast, at least 63 were not the product of electronic voting systems not attributable to the voter and thus in direct violation of HAVA even using the strictest interpretation of the errors allowed under Act before at the very least*

Respondents should have initiated an investigation into the cause to insure such error do not recur in future federal elections supervised by the State.

262. Petitioners believe and therefore aver that upholding HAVA includes risk assessments and proper certification of all voting system elements individually, and the voting system as a whole.

263. Petitioners believe and therefore aver an election official's job is fidelity to the law in administering the electoral process, thereby protecting the integrity of an election, and the citizens from corruption in the election process, and that upon a realization of the errors pointed out in the within Petition, said election officials should investigate and take remedial measures for future federal elections.

264. Petitioners believe and therefore aver that State officials' failure to follow the law has resulted in election outcomes that are untrustworthy. The voting system in its present form cannot be used going forward into 2026 to produce trustworthy and reliable results without the requested judicial intervention.

265. Petitioners believe and therefore aver that a writ of *mandamus* is appropriate in this case. Respondents have failed, and continue to fail, in complying with federal laws regarding voting – including voting accuracy and accountability. It is clear from the Respondents conduct before, during, and after, the 2022 elections that, absent judicial action, despite notice, Respondents will do nothing to repair the deficiencies noted above to ensure the integrity of Florida elections are conducted in compliance with the law.

266. The scope of Petitioners' *mandamus* request is narrow: Petitioners seek this Court order Respondents to follow existing federal law designed by Congress and (if applicable) the Florida legislature to ensure that Florida's 2026 and subsequent combined federal and state general

elections produce reliable results within the margin of error rate allowed.

267. Petitioners hold up the mathematically unreliable analysis (according to, *inter alia*, HAVA) of the 2022 Florida combined federal and state General Election as evidence that, should the writ not issue, the apparent error rate in the 2026 (as the 2024 election has passed and petitioners seek a prospective remedy only) and subsequent combined general elections will continue to exceed the law's mandated maximum error rate permitted and continue to produce election results that are unreliable that should not warrant certification.

268. Petitioners seek that the requested writ direct Respondents to investigate and remedy the issues exposed in the 2022 elections to avoid repeating the same mistakes in future, not-yet-held combined federal and state general elections which are constitutionally administered by Florida pursuant to Article I, Section 4 of the Constitution (delegating to the state legislatures the power to regulate federal elections for members of the House of Representatives, with Congress reserving the power to "...alter such Regulations [made by the various state legislatures]..."),⁹ and, generally, Article II, Section 1 (granting state legislatures the power to determine how presidential electors are chosen) of the United States Constitution.¹⁰

269. Petitioners believe and therefore aver that since the Constitution reserves to Congress the *ultimate* (as opposed to the *presumptive*) power to regulate the means by which

⁹ Petitioners aver that NVRA and HAVA are examples of Congress' exercising its power under Article I, Section 4 to "alter" Florida's (and all other state's) otherwise absolute constitutional authority to regulate federal elections to the House of Representatives and, by application of the 17th Amendment to the U.S. Constitution providing for the direct election of two senators from each state, Congress may exercise its authority "...from time to time by Law to make or alter such Regulations..." [of the various states...] to regulate the election of United States Senators as well the election of members of the House of Representatives.

¹⁰ Petitioners include citation to Article II and the choosing of electors for president and vice-president, (later modified by the 12th Amendment), to again demonstrate the Framers' intent that the various states shall have presumptive authority to regulate and administer the election of all federal officers on the ballot for consideration in a federal election. Article I, Section 4 (as later amended) and Article II, Section 1 (as later amended) are examples of where the Framers *intentionally* intertwined the powers of the various states with those of Congress, while making certain Congress maintained the *ultimate* power to regulate the election of its members, the then-as-now-prevailing concepts of *Federalism* and *Dual Sovereignty* notwithstanding.

Congress' own members are chosen, while the Constitution simultaneously delegates the presumptive power to regulate such elections to, in this case, the legislature of the State of Florida to further delegate as it sees fit to do so by law, Respondents here, who are not federal officers *per se*, become federal officers by agency requiring them to carry out federal election statutes passed by Congress and duly signed into law by the President under Congress' ultimate authority laid out in Article I, Section 4 of the Constitution.

270. Petitioners believe and therefore aver that delegations of authority by the General Assembly of powers to supervise federal elections to any Respondent State officials pursuant to the General Assembly's power to regulate federal elections granted by Article I, Section 4, makes said State Respondents into federal officers by agency or quasi-federal officials in the conducting of their duties to regulate federal elections and subject to the jurisdiction of this Court.

271. Petitioners believe and therefore aver that ordinary principles of federalism and dual sovereignty, where a federal district court judge would be reluctant to issue an order to a state official pertaining to how that state official may perform his/her official functions, are inapplicable because the Respondent State official is acting in his/her hybrid role as a quasi-federal officer as required by Article I, Section 4.

272. Petitioners believe and therefore aver, then, that this Honorable Court has authority to issue the requested writ of *mandamus* to compel, not just the Respondent federal or quasi-federal officers to ensure that federal election law is carried out in Florida's 2026 and subsequent general elections, this Court also has the authority to compel Respondent State officials because said officials are charged by the U.S. Constitution in the carrying out of federal law where Congress has asserted its power to "alter" existing Florida federal election procedures as it did in enacting NVRA and HAVA.

**ACTION TO COMPEL AN OFFICER OF THE UNITED STATES TO PERFORM HIS
DUTY – 28 U.S.C. § 1361**

273. Petitioners incorporate the previous paragraphs as if set forth at length here.

274. District Courts are empowered with the ability to compel an officer or employee of the United States or any agency thereof to perform a duty owed to a plaintiff. 28 U.S.C. § 1361.

275. Respondent Merrick Garland, in his Official Capacity as Attorney General of the United States, is responsible for the enforcement of federal election laws, including HAVA and NVRA.

276. Respondent Merrick Garland, in his Official Capacity as Attorney General of the United States, is an employee of the United States.

277. Petitioners believe and therefore aver that Respondent Merrick Garland, in his Official Capacity as Attorney General of the United States and, by extension, the United States Department of Justice, have done nothing, or, at best, an inadequate job of addressing the issues presented above – namely, the inaccurate and likely fraudulent voter rolls and systems within Florida.

278. The inaction and/or failure to act is harming Petitioners, and the Florida electorate at large, warranting that the Court issue a Writ of *Mandamus* compelling Respondent Merrick Garland, in his Official Capacity as Attorney General of the United States, and the United States Department of Justice to enforce and police the two federal statutes at issue (NVRA and HAVA) for implementation in the Florida 2026 General Election and subsequent combined federal and state elections administered by State officials while giving Respondents a reasonable period of time in which to do so.

279. Specifically, the Court should order Respondents to take preventative measures to see the apparent errors evident the 2022 elections are not repeated in the 2026 and subsequent

elections and bring the State into compliance with HAVA's specific mandate of no greater than 1 voting error out of 125,000 votes to ensure reliable election results as HAVA intended.

280. A writ of *mandamus* is warranted where “(1) no other adequate means exist to attain the relief, (2) the party's right to issuance of the writ is clear and indisputable, and (3) the writ is appropriate under the circumstances.” *Hollingsworth v. Perry*, 558 U.S. 183, 190 (2010) (quoting *Cheney v. United States Dist. Ct.*, 542 U.S. 367, 380–81 (2004) (stay granted where district court likely did not follow federal law)).

281. A writ of *mandamus* is appropriate and necessary to vindicate the rights of citizens when a governmental agency or official has refused to perform a ministerial duty that the Petitioners has established has a clear legal right to have the governmental agency or official, in this case Respondent, perform.

282. A “ministerial action” is a duty in a particular situation so plainly prescribed as to be free from doubt and equivalent to a positive command. *Wilbur v. United States*, 281 U.S. 206, 218 (1930); *see also Will v. United States*, 389 U.S. 90 (1967).

283. Relief contemplated under statute providing that federal district courts shall have original jurisdiction of any action in nature of mandamus to compel an officer or employee of United States or any agency thereof to perform a duty owed to plaintiff is at least as broad as under common-law writ of *mandamus*. *Carey v. Local Bd. No. 2, Hartford, Conn.*, 297 F.Supp. 252 (D. Conn. 1969), *aff'd*, 412 F.2d 71 (2d Cir. 1969).

284. Petitioners believe and therefore aver they have no other remedy than a writ of *mandamus* to compel an officer or employee of the United States or any agency thereof to perform a duty owed to plaintiff/Petitioners.

285. Petitioners argue that injunctive and/or declaratory relief is inapplicable or

inappropriate to its issues because the harm from the 2026 election is not yet realized and Petitioners are seeking to have Florida election officials and/or federal officials bring the state into compliance with federal and state law using private causes of action, specifically under HAVA, NVRA, and the Florida Election Code, absent other specific private causes of action that afford Petitioners relief.

286. Petitioners believe and therefore aver Respondent Merrick Garland, in his Official Capacity as Attorney General of the United States, has allowed, and will continue to allow, violations of federal election laws, the United States Constitution, and federal civil rights laws pertaining to voter rights, which include mandating accurate registration rolls, transparency, compliance, and proper certification of the voting systems.

287. Petitioners believe and therefore aver the voter rolls of the State of Florida are inaccurate, in violation of NVRA and HAVA, and that these errors are not list maintenance failures. Instead, the inaccuracies represent a failure to control the process of validating and registering only qualified citizen voters. Persons voted in the Florida 2022 General Election in significant numbers who held apparently invalid and/or illegal registrations that Florida election officials, on information and belief, did nothing to verify.

288. Petitioners believe and therefore aver that Respondent's failure to follow the law, or enforce the law, has resulted in election outcomes that risk them being untrustworthy and unreliable. The state's voting system in its present form cannot be trusted to produce reliable results under HAVA, because Respondents will not follow the dictates of the Act necessitating this judicial intervention.

289. A writ of *mandamus* against Respondent Merrick Garland, in his Official Capacity as Attorney General of the United States, is appropriate in this case. Respondent Merrick Garland,

in his Official Capacity as Attorney General of the United States and by extension, the United States Department of Justice, has failed, and continue to fail, in requiring the State of Florida to comply with federal laws regarding voting – including voting accuracy and accountability as is clear from how Florida Respondents conducted the 2022 Florida General Election.

290. Petitioners believe and therefore aver that without judicial action, Respondents will do nothing to comply with HAVA and other federal and state statutes to ensure the integrity of Florida's elections and the same issues that are evident from the 2022 General Election will call into question the validity of Florida's 2026 and subsequent General Election results.

291. The scope of this request for a writ of *mandamus* is narrow: Petitioners seek a judicial order requiring Respondents, both federal and state, to follow the laws cited herein in conducting the 2026 and subsequent federal elections, by adequately investigating and remedying the problems exposed in 2022 elections and detailed above.

CONCLUSION

WHEREFORE, Petitioners respectfully request Your Honorable Court formally recognize Florida's voter registration rolls contained hundreds of thousands of apparent errors in the 2022 General Election. Further, that these apparent errors took the form of illegal duplicate registrations, incomplete or unknown addresses, registrations on or before the registrant's date of birth, age discrepant registrants, registrations on a federal holiday, registrations on Sunday, registrations with modified dates of birth, registrants whose voter history inexplicably changed, registrants with registration dates altered back in time, and registrants with altered supposed "unique" state voter identification numbers. Petitioners ask this Court to enter an order in *mandamus* compelling Respondents to ministerially correct the apparent errors evident from the 2022 elections data, ascertain to the Court's satisfaction the reasons why the 2022 errors occurred,

and prevent those same or similar ministerial errors from recurring during the Florida 2026 General Election and all subsequent federal general elections to ensure the integrity of Florida's combined federal and state elections going forward for years to come. Petitioners, additionally, seek pursuant to permissible causes of action under NVRA and HAVA, this Court order that the State of Florida shall remedy these errors to the Court's satisfaction before the next federal election currently scheduled in 2026 demonstrating, again to this Court's satisfaction that the 2026 General Election and subsequent elections will be conducted in conformity with federal and state law and with fewer than the maximum errors permissible. **Petitioners further request this Honorable Court order the state, and any subdivision thereof responsible for voter registrations, submit voter registration requests (and any existing registrations reasonably in question) to the Department of Homeland Security to verify the citizenship or immigration status of persons seeking registration to vote or who are presently on the state's voter rolls whenever there exist any reliable indicators that an applicant or registered voter may not be a U.S. citizen. (see: 8 U.S.C. secs .1644 & 1373(c)).** Lastly, Petitioners seek an order in *mandamus* requiring all public officials named as Respondents ministerially perform their duties as the law intended, whether it be conducting federal elections in conformity with the law, or investigating, correcting, and where warranted in their discretion, prosecuting persons or entities for failing to perform their duties in conformity with the law after being given timely notice to do so.

Respectfully Submitted,

van der Veen, Hartshorn, Levin, & Lindheim

Date: November 6, 2024

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EXHIBIT A

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Scorecard Claims with Query Key

1. Were the voter rolls accurate, as required by the National Voter Registration Act		
1	Invalid Addresses Found	270,804
	USA-FL1-04-02-ADR-ResAddrMissingUnitNumber	251,704
	USA-FL1-04-03-ADR-MailingAddrMissingUnit	4,117
	USA-FL1-08-03-ADR-Government	11,554
	USA-FL1-08-05-ADR-Marinas	3,319
	USA-FL1-08-04-ADR-InvalidAddr	110
2	10-15 People Registered at a Single Family Home	11,819
	USA-FL1-08-02-10to15atSFH	
3	6-89 Voters Registered at a Single Apartment or Lot	10,988
	USA-FL1-07-01-ADR-Over6VotersSameUnit	
4	Illegal Duplicates (after removal of multiple occurrences of same voter)	17,290
	USA-FL1-03-01-DUP-FMILDOB	
	USA-FL1-03-02-DUP-FLAddr1DOBYR	
	USA-FL1-03-03-DUP-FDOByrAddr1	
	USA-FL1-03-04-DUP-FLPhone	
	USA-FL1-03-05-DUP-FDOByrPh	
	USA-FL1-03-06-DUP-FEmailDOByr	
	USA-FL1-03-07-DUP-FMILPh	
	USA-FL1-03-08-DUP-AdrDOBPhone	
	USA-FL1-03-09-DUP-AdrDOBEmail	
	USA-FL1_03-10-DUP-LDOBPhone	
	USA-FL1_03-11-DUP-LDOBEmail	
	USA-FL1_03-12-DUP-FLEmail	
5	Inactive and 8+ years without voting	157,960
	USA-FL1-18-01-TIM-InactiveNotPurged	
6	Registered while voter rolls were closed for 2022 GE	41,336
	USA-FL1-14-01-TIM-RegdAfterCutoff	
7	Backdated registrations	439
	USA-FL1-13-01-IDT-RegDateChangedEarlier	
8	Age discrepant registrants (older than 110, the oldest person in Florida)	887
	USA-FL1-15-01-DOB-TooOld	
9	Registered before age 16	507
	USA-FL1-15-02-DOB-TooYoung	
10	Sunday registration, 1900 - Sept. 2017	19,771
	USA-FL1-16-01-RDT-SundayorHoliday	
11	Federal Holiday Registrations, 1900 - Sept. 2017	20,213
	USA-FL1-16-01-RDT-SundayorHoliday	
12	Invalid Names	12,912
	USA-FL1-09-01-SUS-InvalidNames	

2. Were the votes counted from eligible voters, as required by the US Constitution?		
13	Blank ballots reported	88,635
	01_2022-gen-aggregateresultsoverunderreport_public.xlsx (live.com)	
	https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Ffiles.floridados.gov%2Fmedia%2F706311%2F01_2022-gen-aggregateresultsoverunderreport_public.xlsx&wdOrigin=BROWSELINK	
14	Voted more than once	42
	USA-FL2-01-01-VOT-VotedMoreThanOnce	

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EXHIBIT B

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Florida's 2022 General Election Validity Scorecard

★ 1. Were the voter rolls accurate, as required by the National Voter Registration Act of 1993?

Ineligible or Uncertain Registration Type as of June 2023	Number of Instances ¹
Invalid addresses found	270,804
10-15 people registered at a single family home	11,819
6 – 89 voters registered in a single apartment or lot	10,988
Illegal duplicates	17,096
Inactive and 8+ years without voting (Statute 98.065 2 a.b. – 5.d.)	157,960
Registered while voter rolls were closed for 2022 GE	41,336
Backdated registrations	439
Age discrepant registrants (older than 110, the oldest known person in Florida)	887
Registered before age 16	507
Sunday registration, 1900 – Sept. 2017	19,771
Federal holiday registration, 1900 – Sept. 2017	20,213
Invalid names	12,912
APPARENT REGISTRATION VIOLATIONS:	564,732

★ 2. Were the votes counted from eligible voters, as required by the US Constitution?

Ineligible or Uncertain Registration Type that Voted in 2022 General Election	Votes cast in 2022 GE ²
Invalid/incomplete address & voted	77,063
10-15 voters registered at a single family home	3,042
6 – 89 voters registered in a single apartment or lot	2,470
Illegal duplicate registrations – All votes	6,867
Illegal duplicate registrations – Double+ votes	1,724*
Registered after 2022 GE cutoff date, yet voted	51
Backdated registration date	208
Age discrepant registrants (older than 110, the oldest known person in Florida)	3
Registered on Sundays 1900 – Sept. 2017	10,132
Federal holiday registration, years 1900 – Sept. 2017	12,207
Invalid names	7,844
Blank ballots reported	88,635 ³
Double voters	42
APPARENT VOTING VIOLATIONS: (*NOT INCLUDED IN TOTAL)	208,024
UNIQUE VOTES IMPACTED BY APPARENT VOTING VIOLATIONS:	205,750

★ 3. Was the number of votes counted equal to the number of voters who voted?

Official Source	per Dec. 2022 Voter History File ²
Florida DOE Official Results of 2022 GE — Votes counted	7,796,916
Florida raw data, official federal document — Voters who voted	7,651,607
DIFFERENCE: More votes counted than voters who voted	145,309

★ 4. Was the number of ballots in error valid according to the Help America Vote Act of 2002?

Apparent voting violations in the 2022 GE according to Florida DOE raw data	205,750
Allowable machine error rate is 1/10,000,000 ballot positions or 1/125,000 ballots	62
Provable accuracy fails to meet any protective legal standard	Unresolved vote errors: 205,688

"Congress seeks. . . to guard the election of members of Congress against any possible unfairness by compelling, under its pains and penalties, everyone concerned in holding the election to a strict and scrupulous observance of every duty devolved upon him while so engaged. . . . The evil intent consists in disobedience to the law." —In re Coy, 127 U.S. 731 (1888)

¹ Source: The official Florida DOE 20221102_VoterDetail file

² Source: The official Florida DOE 20221215_VoterHistory file

³ Source: The official Florida DOE 2022 General Election Report on Overvotes and Undervotes

EXHIBIT C

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Florida's 2022 General Election Validity Reconciliation

GROUP	DESCRIPTION	REGISTRATIONS	2022 GENERAL ELECTION VOTES
Eligible	Records appear valid so voters are presumed eligible to vote. Results can be certified.	15,176,814	7,573,512
Uncertain	Records contain illogical and/or invalid information, so it is uncertain whether voters are eligible to vote. Investigation is required before results can be certified.	114,266	39,946
Ineligible	Records appear to violate black letter election laws, so voters are presumed ineligible to vote. Investigation is required before results can be certified.	293,605	38,149
Deadwood*		157,960	0
TOTAL		15,742,645	7,651,607
Total Database Records / Total Votes Counted per official published tallies		15,742,645	7,796,916
DIFFERENCE		0	145,309 **

Registration Error Rate^ 2.86%
Vote Error Rate (includes blank ballots and votes without voters)^ 3.49%
Margin of Victory in FL Congressional District 22 Primary (11,960/11,827 votes) + 0.38%
Margin of Victory in FL House District 29 Primary (7,450/7,420 votes) ++ 0.20%
Legal Standard of Allowable Error for Federal Elections+++ 0.0008%

Florida's 2022 General Election Validity Reconciliation

The measured error rate of the electoral process in Florida, from registration through certification, makes it impossible to legally certify any election in Florida whether due to ignorance, arrogance or malice.

The registration and voting error rates reported here represent minimums. We have ample reason for concern, after two years of careful study, that the actual error rates are higher.

The error rate in the 2022 General Election was 4,362 times the legal standard for system accuracy (3.49% vs 0.0008 %).

* "Deadwood" allows for fraudulent ballots, which can be used to stuff the ballot box." Federal Prosecution of Election Offenses, Eighth Edition, 2017, US Department of Justice Public Integrity Section, Chapter 2 Corruption of the Election Process (B)(5)(a), Richard C. Pilger, ed., p. 28.

** 145,309 votes counted are completely unaccounted for in the system. They are not associated with any voter as of the date of certification.

^ Ineligible + Deadwood / total registrations in November 2022

^^ Ineligible + Blank Ballots + Votes without Voters / total 2022 GE votes

+ Data taken from Florida Division of Elections, 2022 Primary Results: <https://results.elections.myflorida.com/Index.asp?ElectionDate=8/23/2022&DATAMODE=>

++ Data take from Florida Division of Elections, 2022 Primary Results: <https://results.elections.myflorida.com/Index.asp?ElectionDate=8/23/2022&DATAMODE=>

+++ "This rate is set at a sufficiently stringent level such that the likelihood of voting system errors affecting the outcome of an election is exceptionally remote even in the closest of elections." Voting System Standards, Volume I: Performance Standards, April, 2002, Federal Election Commission, United States of America. The accuracy requirement of the voting system is predicated on the voter rolls being accurate as required by the National Voter Registration Act, 1993.

Source: The official Florida DOE 2022112_VoterDetail file & the official Florida DOE 20221215_VoterHistory file

EXHIBIT D

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Column Labels					
County	A. Invalid Addr		B. Missing Unit		C. Non-SFH
	Sum of Violations	Sum of Votes	Sum of Violations	Sum of Votes	Sum of Violations
Alachua	4573	1093	47	19	6
Baker	86	39	4	2	
Bay	1452	416	22	8	42
Bradford	165	53			1
Brevard	3759	1337	65	24	42
Broward	23655	6453	419	115	11
Calhoun	70	29			
Charlotte	990	424	18	9	48
Citrus	522	194	18	6	9
Clay	1201	436	12	5	12
Collier	552	216	1	1	5
Columbia	334	74	8	3	4
Desoto	199	75			2
Dixie	184	47			2
Duval	10986	2737	110	35	388
Escambia	6653	1641	72	22	16
Flagler	198	80	14	5	3
Franklin	125	55			4
Gadsden	290	47			
Gilchrist	68	25	2		
Glades	265	105			
Gulf	78	28	1		1
Hamilton	89	28			2
Hardee	202	38			8
Hendry	313	93	11	5	2
Hernando	594	209	36	12	8
Highlands	511	98	4	1	8
Hillsborough	13005	3328	353	73	53
Holmes	86	41			1
Indian River	747	263	8	2	2
Jackson	308	100	2	1	3
Jefferson	59	29			
Lafayette	53	27			3
Lake	3079	1165	3	2	40
Lee	5862	2080	9	5	10
Leon	6059	1368	798	197	6
Levy	539	275	1		9
Liberty	32	12			
Madison	78	23			4

Manatee	2353	791	15	8	19
Marion	2145	778	36	14	23
Martin	1646	750	27	12	1
Miami-Dade	36936	10116	802	194	76
Monroe	3636	1289	18	9	156
Nassau	640	248	4	2	6
Okaloosa	9233	3252	8	2	8694
Okeechobee	667	259	1		2
Orange	13030	3955	145	49	15
Osceola	3746	937	28	9	6
Palm Beach	23101	7039	241	82	10
Pasco	2513	919	23	6	244
Pinellas	11807	4215	94	33	20
Polk	6108	1537	40	13	163
Putnam	485	174	3	1	3
Santa Rosa	1617	401	21	5	25
Sarasota	4952	1979	119	40	344
Seminole	2385	594	26	10	3
St. Johns	1650	678	30	16	30
St. Lucie	2245	490	23	2	6
Sumter	973	390	10	2	29
Suwannee	334	130			
Taylor	87	32			3
Union	56	17			1
Volusia	5465	1400	53	20	24
Wakulla	167	77	3	1	1
Walton	341	154	9	6	16
Washington	149	30	2	1	3
(blank)	25217	2615	289	21	876
Grand Total	251,785	70,027	4,117	1,110	11,554

United Sovereign Americans (Florida SCC)

(**Note:** Purged Registrations are in the last row - {blank})

C. Non-SFH	D. Marina	E. 999905 Boat	F. 10-15 SFH
Sum of Votes	Sum of Violations	Sum of Votes	Sum of Violations
1	1		124
			11
19			35
1	2	2	19
21	19	16	209
5	4	2	1490
			12
19	14	11	47
2	2	2	27
8	2845	1751	67
2	5	4	88
4			15
	2	2	
2			
161	7	6	351
8	2	2	130
	4	2	41
4			
			82
	1	1	3
	2	2	
	1		11
2			
4	2	2	1
2	2	2	25
8	6	4	4
3	3	2	3
29	4	4	984
2	13	13	19
2	2	1	20
			1
2			
23	14	10	126
6	20	16	145
3			133
7	6	6	9
4	2	2	6

11	2				65
14	11	10			137
	12	10			48
16	3	3			2298
99	14	11	91	24	29
4	5	4			78
3083	5	4			44
2					7
6	3	3			988
	2				455
2	3	3			741
85	3	2			172
10	12	7			221
59	17	10			370
1	2	2			20
11	4	2			258
162	14	13			109
	2				307
13	13	7			70
2	13	11			148
14	6	6			13
	2	2			10
1					10
11	9	9			247
	1	1			3
10	2				8
2					20
170	174	108	15		705
4,142	3,319	2,093	110	26	11,819

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ORECARD) (By County)**County)**

F. 10-15 SFH	G. 6+ Apt/Lot	H. III Dups	I. Inactive
Sum of Votes	Sum of Violations	Sum of Votes	Sum of Violations
27	180	35	248
5			91
10	83	22	5343
5	18		23
61	186	41	6
423	1588	458	294
5			140
12	45	11	46
8	19	9	38
27	53	20	25
27	302	102	389
	28	12	428
			11585
			2243
			895
			31448
			16
			6
			299
			66
			28
			96
			49
			2546
			280
			162
			5265
			189
			124
			5601
			114
			46
			1688
			19
			5
			36
			21
			8
			275
89	383	89	1158
23	196	25	425
11	98	26	21223
			114
			11656
			64
			37
			3205
			21
			6
			310
13	7		66
1	1		19
			971
			43
			16
			1058
			19
			11
			304
5			36
			21
			515
			11
			2
			342
			43
			6
			11
5	4	1	38
	13		13
	15	2	817
			153
			95
			3464
			81
			30
			1041
260	595	139	752
			333
			37206
			5
			2
			68
6	41	8	137
12	1	1	44
			10815
			34
			15
			1165
			23
			15
			52
			67
56	131	25	165
43	63	16	87
34	481	87	5956
3	11	2	411
			124
			15934
			258
			98
			11894
			48
			33
			900
			11
			4
			120
2			47
			14
			13

12	141	49	333	187	7728
35	390	104	88	39	8547
29	12		60	24	3950
673	1227	422	1440	494	37268
11	2		71	27	2296
29	42	9	147	102	2334
22	98	20	122	60	8423
5	6	2	27	8	555
254	1281	255	495	155	25734
60	219	30	228	113	7998
219	519	138	963	395	51834
37	181	35	297	168	10751
52	20	6	523	242	22815
66	290	35	642	250	37237
6	12	1	91	52	1328
67	49	14	78	34	7437
32	21	9	184	79	8736
92	463	86	123	47	6839
18	54	22	144	75	4848
19	83	18	288	110	5878
3	13	2	87	54	1463
5	6	1	53	21	557
			26	10	292
9			20	7	10
65	210	49	397	161	9501
3	1		35	26	495
8	33	9	47	22	561
2	1		16	5	958
60	1072	38	1863	452	258398
3,066	10,988	2,485	17,096	6,902	734,064

I. Inactive	J. Aft Cutoff	L. Age 110+	M. Age 16-
Sum of Votes	Sum of Violations	Sum of Votes	Sum of Violations
530	128		46
64	15		
565	72		6
40	7	1	1
1607	207		3
2799	518	296	61
9			2
628	100		1
434	63		1
465	42	3	
1239	175		2
125	8		1
61	6		
34	4		1
1818	337	19	29
689	29	1	4
458	108		4
27	4		1
45	2	3	4
37	9		1
21	2		
38	3		
20	3	1	
15	2	2	2
50	10	1	1
414	39	4	2
243	20		
3292	507	2	49
34	3		
400	48		2
56	14	3	
12	6		2
5	1		
1065	177	6	
2311	225		26
563	174	13	11
94	13		2
7	2		
7	1	3	2

1281	215	9		7
998	145			1
359	69	9		2
6495	1304	160	1	32
216	28			1
277	69	1		3
641	72			9
58	8			1
2924	408	19		24
965	93	3		5
3524	481	38		71
1585	235	5		4
2423	352	64		6
1831	251	3		6
140	28	1		1
514	78	2		1
1562	245	29		13
923	143	5		13
809	126	2		1
893	63	16		10
652	122			
67	7	4		1
21	6	1		
12	7			
1342	201	1		2
96	21			
312	65			
45	3			4
1120	125	157	1	22
52,406	8,054	887	3	507

M. Age 16-	N. Sun Reg	O. Hol Reg	P. Bad Names
Sum of Votes	Sum of Violations	Sum of Votes	Sum of Violations
15	350	173	342
	28	20	33
1	224	108	216
	40	25	27
2	360	142	604
17	1741	816	1566
2	6	4	48
	84	51	110
	76	51	168
	254	178	201
2	250	146	141
	67	27	75
	30	14	25
	5		20
6	2201	1415	527
1	125	32	258
	55	35	98
	17	12	12
	40	16	72
	38	23	23
	28	22	17
	24	15	18
	22	14	18
	91	23	27
1	69	41	69
	94	54	135
	67	15	104
11	1080	583	1280
	9	6	33
	210	97	220
	32	20	54
1	29	24	21
	8	5	7
	244	139	300
5	486	206	567
4	299	192	746
1	38	25	58
			10
	21	7	33
			16
			45

2	215	142	226	160	281
1	273	130	424	276	219
	120	76	164	110	175
10	3358	1501	1975	1120	578
	46	31	36	25	56
1	105	79	64	50	51
5	148	72	143	101	110
	19	11	48	29	14
6	964	445	1381	837	608
	241	106	325	205	83
26	1371	824	1095	714	943
3	228	130	672	361	296
1	451	277	1009	723	694
2	509	225	498	260	274
	81	45	148	103	46
1	139	90	218	129	314
2	261	157	244	165	534
4	361	220	538	298	196
	206	144	264	214	184
3	362	103	322	128	191
	47	31	116	90	112
	22	18	48	32	60
	42	31	43	29	27
	13	10	16	9	21
	278	150	657	449	286
	33	23	44	29	27
	45	28	44	30	42
1	25	6	28	8	20
3	966	206	1140	335	1159
140	19,771	10,087	20,213	12,152	12,912

P. Bad Names Sum of Votes	Total Sum of Violations	Total Sum of Votes
65	11903	1840
19	565	125
67	8028	893
13	759	145
167	19380	2864
466	68217	11132
13	480	93
289	2747	1029
113	4060	608
62	10756	2831
155	8596	1053
30	2504	226
28	422	148
12	563	85
209	39562	5834
103	20451	2096
21	4271	392
10	533	97
25	1643	153
12	1295	99
9	668	163
5	732	90
8	518	71
4	424	82
10	1418	216
67	5037	565
38	2154	243
405	59251	6461
10	248	80
94	12759	727
19	1706	225
41	246	136
15	162	56
172	11368	2056
373	26395	3455
122	21429	2807
33	1763	438
9	192	34
27	261	96

216	12675	1793
151	13292	1697
134	6585	1214
275	92648	16129
37	6668	1591
38	3757	635
80	27678	6773
7	1405	331
362	47611	6735
50	14304	1603
569	84454	10492
214	16974	2195
492	40159	6410
157	47988	2865
27	2361	440
208	10677	1040
344	17122	3227
139	12184	1633
149	8314	1462
86	10478	1035
84	3521	798
38	1164	254
21	542	129
17	159	77
201	18472	2716
22	906	203
30	1460	362
11	1271	69
362	293173	4496
7,861	1,151,468	128,148