

2024-010278

**IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY, PENNSYLVANIA**

**John Proctor Child, Joy Schwartz, Kathryn Buckley, Alfeia Goodwin, Paul Rumley, et al.,  
Petitioners,**

**v.**

**Delaware County, Delaware County Board of Elections, Delaware County Council, and  
James Allen, in his official capacity as Director of Elections, Respondents.**

**PETITION FOR EMERGENCY INJUNCTIVE RELIEF PURSUANT TO 42 Pa. C.S. §  
1531**

**I. INTRODUCTION**

Petitioners, as qualified electors, candidates, and/or authorized representatives, request an immediate injunction to delay the certification of Delaware County's November 5, 2024, election results. This request seeks a comprehensive audit of all mail-in ballots, absentee ballots, and machine-counted votes to address potential violations of Pennsylvania election law and relevant federal statutes. Immediate attention is required due to the imminent certification deadline and potential harm to the lawful electoral process.

**II. PARTIES**

Petitioners:

- John Proctor Child  
Elected Republican Committeeman, Radnor 7-2  
John Mancinelli, Authorized Representative, PA Representative, 161st District  
Minority Inspector, Radnor 6-1  
[Contact: JohnBuysProperty@gmail.com]
- Euphrosyne (Joy) Schwartz  
Elected Republican Committeewoman, Upper Darby 3-3  
Jeff Jones, Authorized Representative, PA Representative, 163rd District  
[Contact: jschwartzpro@gmail.com]
- Paul Rumley  
Elected Republican Committeeman, Springfield 2-2  
Mike Woodin, Authorized Representative, PA Senate, 9th District  
[Contact: perumley@gmail.com]
- Kathryn Buckley  
Candidate for Pennsylvania State Representative, 168th Legislative District  
Elected Republican Committeewoman, Edgmont 2-5  
[Contact: kathy1070@comcast.net]

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OFFICE OF JUDICIAL SUPPORT  
DELAWARE CO, PA.

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- Dr. Alfeia DeVaughn-Goodwin, PhD.  
Candidate for United States Representative for Pennsylvania, 5th Congressional District  
[Contact: alfeia@mail.com]

Respondents:

- Delaware County
- Delaware County Board of Elections
- Delaware County Council
- James Allen, in his official capacity as Director of Elections

### III. JURISDICTION AND VENUE

This Court has jurisdiction under 42 Pa. C.S. § 1531, authorizing intervention to prevent the unlawful certification of election results. Venue is proper in the Court of Common Pleas of Delaware County, Pennsylvania, as the actions at issue occurred in Delaware County, PA.

### IV. FACTUAL BACKGROUND AND ALLEGATIONS

#### 1. Machine Testing and Certification Irregularities

- **Incomplete Hash Testing:** On September 23, 2024, Delaware County conducted hash testing on less than 3% of voting machines, violating 25 P.S. § 3031.7, which mandates full pre-election testing under the Election Assistance Commission (EAC) standards, 52 U.S.C. § 21081(a)(5).  
*(Exhibit A - Mancini et al. v. Delaware County et al.)*
- **Unauthorized Software:** The EAC standards, 52 U.S.C. § 21081(a)(5), require comprehensive "trusted build" validation for all voting machines to prevent unauthorized software usage. During the incomplete testing of the voting machines, unauthorized software capable of generating numerical algorithms and not part of the "trusted build," was detected, contradicting 25 P.S. § 3031.14 and 52 U.S.C. § 21081 by permitting uncertified software in voting systems.  
*(Exhibit A - Mancini et al. v. Delaware County et al.)*

#### 2. Mail-In Ballot Distribution and Processing Irregularities

- **Duplicate and Unauthorized Ballots:** Delaware County issued duplicate ballots to certain addresses and distributed ballots to ineligible voters. These actions violated 25 P.S. § 3146.2, which allows only verified eligible voters to receive mail-in ballots, and 25 P.S. § 3146.6, which requires verification of returned ballots against voter registration records. The issuance of duplicate ballots also contravenes 52 U.S.C. § 21081(a)(1), which demands accurate ballot tabulation and prohibits improper counting.  
*(Exhibit B - Duplicate MIB Delivery, Exhibit C - Delivery of MIBs to Ineligible Voters)*

### 3. Observer Restrictions

- **Restricted Access for Observers:** Delaware County imposed access restrictions on observers, preventing them from observing critical canvassing and machine testing stages. These actions violate 25 P.S. § 2687, which guarantees observer access and oversight rights, and 25 P.S. § 2650, which permits up to three watchers per group during canvassing. Further, the county's unreasonable restrictions on visibility and documentation tools breach 25 P.S. § 2642(f), while its failure to provide adequate notice of observer procedures contravenes 25 P.S. § 3514(d). Additionally, restricted access undermines federal audit requirements under 52 U.S.C. § 21081(a)(2), which demand transparency and verifiability.  
*(Exhibit D - 10.7.24 Letter to Delaware County)*

### 4. Discrepancies in Mail-In Ballot (MIB) Counts

- **Unaccounted Ballot Processing Discrepancies:** On November 5, 2024, observers documented a 29% discrepancy between the processing of approximately 67,150 Mail-In Ballots (MIBs) and the official record of 87,248 MIBs. This variance violates: 25 P.S. § 2687, which grants observers the right to challenge irregularities, ensuring transparency and accuracy in vote processing; 25 P.S. § 3154, which requires reconciliation of ballots received with votes cast; 52 U.S.C. § 21081(a)(2), mandating an auditable trail to identify and correct such discrepancies; and 25 P.S. § 3031.7, requiring voting systems to function as certified.  
*(Exhibit F - Estimated MIB Tabulation)*

## V. LEGAL CLAIMS

- **Violations of the Pennsylvania Election Code**  
Respondents failed to ensure full machine accuracy audits, lawful observation rights, and prevented ballot issuance to ineligible voters, violating 25 P.S. §§ 2642, 2650, 2687, 3031, 3146, and 3154.
- **Violations of Federal Election Law**  
Respondents' incomplete machine testing and unqualified ballot issuance breached federal standards for machine integrity and voter eligibility as outlined in 52 U.S.C. § 21081(a)(1), (a)(2), and (a)(5), which mandate accurate tabulation, audit capacity, and system integrity, and 52 U.S.C. § 20511, which prohibits unlawful ballot distribution.

## VI. REQUEST FOR RELIEF

Petitioners respectfully request the following relief under Rule 1531:

1. **Temporary Restraining Order and Preliminary Injunction**  
Immediately enjoin Delaware County from certifying the November 5, 2024, election

results until a comprehensive, neutral, third-party-supervised audit of mail-in ballots, absentee ballots, and machine counts is conducted to verify compliance with Pennsylvania and federal election laws.

**2. Comprehensive Audit**

Order a neutral, supervised audit of all ballots and voting machines used in the election. This audit should include:

- Verification of absentee and mail-in ballot counts.
- Voter eligibility assessment.
- Comprehensive testing of all voting machines.

**3. Access for Authorized Representatives**

Provide unrestricted observation access for observers during all phases of the election process.

**4. Declaratory Judgment**

Issue a declaratory judgment stating that Delaware County's actions in the 2024 general election violated the Pennsylvania Election Code and applicable federal statutes by failing to ensure transparent, accurate, and lawful election processes.

**VII. VERIFICATION AND SIGNATURE**

The undersigned Petitioners verify under penalty of perjury that the facts and allegations stated are true to the best of their knowledge and belief.

DocuSigned by:

*Kathryn Buckley*

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Signed by:

*Alfeia DeVaughn-Goodwin*

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11/21/2024

**John Proctor Child**  
**Euphrosyne (Joy) Schwartz**  
**Paul Rumley**  
**Kathryn Buckley**  
**Dr. Alfeia DeVaughn-Goodwin, Phd**


Signed by:

*Euphrosyne Schwartz*

43521FB575474DE...

11/21/2024

Signed by:

*John Child* 

FCB79ACA2483420...

11/21/2024

Signed by:

*Paul Rumley*

8F438BFED354414...

11/21/2024

# EXHIBIT

“A”

Robert Mancini  
4 Guernsey Lane  
Media PA 19063  
Phone 610-506-9827

Alfeia Goodwin  
117 Abbey Ter.  
Drexel Hill, PA 19026  
267-977-0757

Fax- None

None

Email Delcocyber@gmail.com

Alfeia@mail.com

Representing Self

Representing Self as Candidate

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**IN THE CIVIL COURT OF DELAWARE COUNTY OF PENNSYLVANIA**

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Alfeia Goodwin, Candidate 5<sup>th</sup> District, : Preliminary Injunction  
Of the United States House of Representatives  
Robert Mancini, Delaware County resident :  
Registered Voter of Pennsylvania  
Individually :  
Petitioners Pro Se, : CV-2024-  
v. :  
Delaware County, PA :  
Respondent :

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**APPLICATION FOR EMERGENCY RELIEF AND SEEKING A  
PRELIMINARY INJUNCTION**

Petitioner, Pro Se, pursuant to PA. R.A.P. 123, PA R.A.P. 1532(a) and PA R.C.P. submits the following Application for Emergency Relief Seeking a Preliminary Injunction and avers as follows:

## Introduction

1. Petitioner Alfeia Goodwin is a resident and Candidate for the 5<sup>th</sup> District of Pennsylvania for the United States House of Representatives, with the address of 117 Abbey Terrace; Drexel Hill, PA 19026.
2. Petitioner Robert Mancini is a resident, taxpayer, and registered voter with the address of 4 Guernsey Lane, Media PA 19063
3. Respondent is Delaware County (the “County”) is a jurisdiction and government agency with a business address of 201 West Front Street, Media, PA 19063.
4. The Election Assistance Commission (EAC) is a federal agency located at 633 Third Street, NW, Suite 200; Washington, DC 20001.
5. The Election Assistance Commission is a federal agency responsible for overseeing all Electronic Voting Systems approval in the United States of America.
6. The Department of State of Pennsylvania is a government agency with a business address of 401 North Street; Harrisburg, PA 17120.
7. The Department of State of Pennsylvania is responsible for certifying all Electronic Voting Systems for use in Pennsylvania, having adopted EAC certification standards and given the EAC has also certified the voting system.
8. The November 5, 2024 election is a federal election and all votes in Pennsylvania count equally toward the determination of the Pennsylvania Electoral College and the determination of the Pennsylvanian Senatorial race.
9. On January 12, 2023, the acting Secretary of the Commonwealth certified the use of the Hart Verity Voting 2.7 version of its proprietary election software.
10. Delaware County uses Hart Verity Voting 2.7 as an electronic voting system.
11. The Pennsylvania Department of State Voting Machine Certification, attachment A page 11, lists the proprietary software used in the Hart Verity Voting system, and states as follows:

## Proprietary Software

System Component	Software or Firmware Version	Comments
Verity Data	2.7.1	Data management software
Verity Build	2.7.1	Election definition software
Verity Central	2.7.1	High speed digital scanning software
Verity Count	2.7.1	Tabulation and reporting software
Verity Relay Receiving Station	2.7.1	Data transmission software (receiving station)
Verity Transmit	2.7.1	Data transmission software
Verity Transmit Receiving Station	2.7.1	Data transmission software (receiving station)
Verity Print	2.7.1	On-demand ballot printing device firmware
Verity Scan	2.7.1	Digital scanning device firmware
Verity Scan with Relay	2.7.1	Digital scanning device firmware with optional Relay functionality
Verity Touch Writer	2.7.1	Ballot marking device
Verity Touch Writer Duo	2.7.1	Ballot marking device, with internal COTS ballot summary printer and optional audio tactile interface
Verity Touch Writer Duo Standalone	2.7.1	Ballot marking device, with internal COTS ballot summary printer and optional audio tactile interface
Verity Controller	2.7.1	Polling place management device

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Figure 1 Hart Proprietary Software<sup>1</sup>

12. The Pennsylvania Department of State Certification, attachment A page 12, lists the COTS Software and Firmware authorized for use in the Hart Verity 2.7 system, and states:

<sup>1</sup> <https://www.pa.gov/content/dam/copapwp-pagov/en/dos/programs/voting-and-elections/voting-systems/certification/Hart-Verity-Voting-2.7-Final-for-web.pdf> P11



## COTS Software and Firmware

Description	Version
<b>Verity Data, Build, Count, Relay Receiving Station, Transmit Receiving Station</b>	
Microsoft Windows 10 Enterprise 2019 LTSC	10.0.17763
Microsoft SQL Server Standard 2019	15.0.4153.1
McAfee Application Control for Devices (McAfee Solidifier)	8.2.1-143
<b>Verity Central – Central Count Paper Ballot Scanner</b>	
Microsoft Windows 10 Enterprise 2019 LTSC	10.0.17763
Microsoft SQL Server Standard 2019	15.0.4153.1
McAfee Application Control for Devices (McAfee Solidifier)	8.2.1-143
Nuance Western OCR, Desktop, OEM	V20
<b>Verity Print, Touch Writer – Electronic BMD Device, Touch Writer Duo – Electronic BMD Device, Touch Writer Duo Standalone – Electronic BMD Device, Controller, Transmit</b>	
Microsoft Windows 10 Enterprise 2019 LTSC	10.0.17763
Microsoft SQLite	3.36.0
McAfee Application Control for Devices (McAfee Solidifier)	8.2.1-143
<b>Verity Scan – Precinct Paper Ballot Scanner</b>	
Microsoft Windows 10 Enterprise 2019 LTSC	10.0.17763
Microsoft SQLite	3.36.0
McAfee Application Control for Devices (McAfee Solidifier)	8.2.1-143
Nuance Western OCR, Desktop, OEM	V20

## Hardware

Figure 2 Figure 1 COTS Software and Firmware<sup>2</sup>

13. The Election Assistance Commission (EAC) sets national standards for the testing and certification of election machines and software. The EAC standards call for the testing of all software used in elections, before and after an election. The EAC defines software testing, sometimes known as “hash testing”, as a “trusted build”. (Exhibit A).

“Trusted Build – A software build is the process whereby a source code is converted to machine readable binary instructions (executable code) for the computer. A trusted build is a build performed with adequate security measures implemented to give confidence that the executable code is a verifiable and faithful representation of the source code. The primary function of a trusted build is to create a chain of evidence that allows stakeholders to have an approved model to use for verification of a voting system.”

<sup>2</sup> <https://www.pa.gov/content/dam/copapwp-pagov/en/dos/programs/voting-and-elections/voting-systems/certification/Hart-Verity-Voting-2.7-Final-for-web.pdf> P12

14. On Monday, September 23, Delaware County Bureau of Elections performed a “trusted build” on a small sample, less than 3%, of the Hart Verity 2.7 voting machines the county intends to use in the November 5, 2024 general election. Despite the requirement for all software on all machines to be tested with a trusted build validation, only 9 out of 428 voting precincts, or 18 out of 856 machines were tested in Delaware County. (There are two machines per precinct.) Listed below are the URLs published by the county, claiming to show the results of that testing.

15. [https://delcopa.gov/vote/hash\\_test\\_results.html](https://delcopa.gov/vote/hash_test_results.html)

16. The results for Marple 3-1 is on the next page



Figure 3 Marple 3-1

17. Below is the list of URLs for the remaining results

<https://delcopa.gov/vote/pdf/2024/Hash Results/Aldan West S190322110.pdf>

<https://delcopa.gov/vote/pdf/2024/Hash Results/Aldan West W1913451711.pdf>

[https://delcopa.gov/vote/pdf/2024/Hash Results/Marple 3 1 S1903182210.pdf](https://delcopa.gov/vote/pdf/2024/Hash%20Results/Marple%203%201%20S1903182210.pdf)  
[https://delcopa.gov/vote/pdf/2024/Hash Results/Marple 3 1 W1913440511.pdf](https://delcopa.gov/vote/pdf/2024/Hash%20Results/Marple%203%201%20W1913440511.pdf)  
[https://delcopa.gov/vote/pdf/2024/Hash Results/Upper Darby 3 5S1903215910.pdf](https://delcopa.gov/vote/pdf/2024/Hash%20Results/Upper%20Darby%203%205S1903215910.pdf)  
[https://delcopa.gov/vote/pdf/2024/Hash Results/Upper Darby 3 5W1913442711.pdf](https://delcopa.gov/vote/pdf/2024/Hash%20Results/Upper%20Darby%203%205W1913442711.pdf)  
[https://delcopa.gov/vote/pdf/2024/Hash Results/Upper Darby 7 7S1903176810.pdf](https://delcopa.gov/vote/pdf/2024/Hash%20Results/Upper%20Darby%207%207S1903176810.pdf)  
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[https://delcopa.gov/vote/pdf/2024/Hash Results/WharfD1700190406.pdf](https://delcopa.gov/vote/pdf/2024/Hash%20Results/WharfD1700190406.pdf)  
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[https://delcopa.gov/vote/pdf/2024/Hash Results/WharfD1900217007.pdf](https://delcopa.gov/vote/pdf/2024/Hash%20Results/WharfD1900217007.pdf)  
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[https://delcopa.gov/vote/pdf/2024/Hash Results/WharfD1900247912.pdf](https://delcopa.gov/vote/pdf/2024/Hash%20Results/WharfD1900247912.pdf)  
[https://delcopa.gov/vote/pdf/2024/Hash Results/Haverford 7 4S1903185710.pdf](https://delcopa.gov/vote/pdf/2024/Hash%20Results/Haverford%207%204S1903185710.pdf)  
[https://delcopa.gov/vote/pdf/2024/Hash Results/Haverford 7 4W1913438711.pdf](https://delcopa.gov/vote/pdf/2024/Hash%20Results/Haverford%207%204W1913438711.pdf)  
[https://delcopa.gov/vote/pdf/2024/Hash Results/Radnor 6 2S1903219010.pdf](https://delcopa.gov/vote/pdf/2024/Hash%20Results/Radnor%206%202S1903219010.pdf)  
[https://delcopa.gov/vote/pdf/2024/Hash Results/Radnor 6 2W2013635001.pdf](https://delcopa.gov/vote/pdf/2024/Hash%20Results/Radnor%206%202W2013635001.pdf)  
[https://delcopa.gov/vote/pdf/2024/Hash Results/Upper Darby 4 5S1913562312.pdf](https://delcopa.gov/vote/pdf/2024/Hash%20Results/Upper%20Darby%204%205S1913562312.pdf)  
[https://delcopa.gov/vote/pdf/2024/Hash Results/Upper Darby 4 5W1913427311.pdf](https://delcopa.gov/vote/pdf/2024/Hash%20Results/Upper%20Darby%204%205W1913427311.pdf)  
[https://delcopa.gov/vote/pdf/2024/Hash Results/Upper Darby 7 8S1903204310.pdf](https://delcopa.gov/vote/pdf/2024/Hash%20Results/Upper%20Darby%207%208S1903204310.pdf)

[https://delcopa.gov/vote/pdf/2024/Hash\\_Results/Upper\\_Darby\\_7\\_8W2013621301.pdf](https://delcopa.gov/vote/pdf/2024/Hash_Results/Upper_Darby_7_8W2013621301.pdf)

[https://delcopa.gov/vote/pdf/2024/Hash\\_Results/Yeadon\\_1S1913579012.pdf](https://delcopa.gov/vote/pdf/2024/Hash_Results/Yeadon_1S1913579012.pdf)

[https://delcopa.gov/vote/pdf/2024/Hash\\_Results/Yeadon\\_1W2013638401.pdf](https://delcopa.gov/vote/pdf/2024/Hash_Results/Yeadon_1W2013638401.pdf)

18. The test results of all the 18 voting machines tested, reveal a comprehensive list of software present on each of the 18 machines, including a software known as MathNet.Numerics, not authorized for installation on the Hart Verity 2.7 version of the voting system, and referred heretofore as “unauthorized software.”

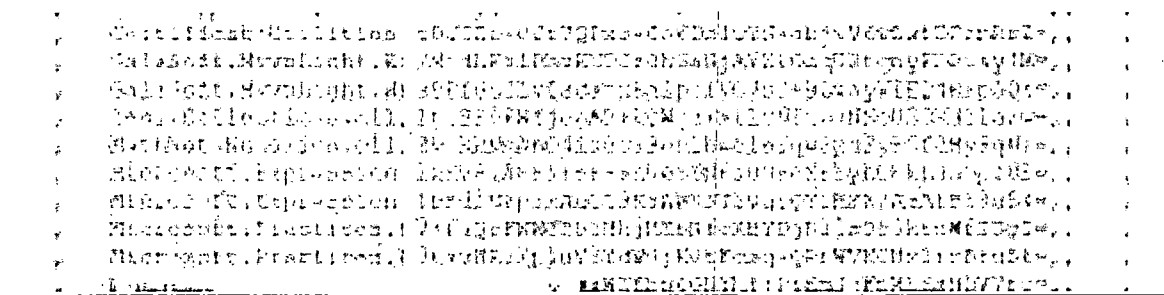


Figure 4 [https://delcopa.gov/vote/pdf/2024/Hash\\_Results/Marple\\_3\\_1\\_S1903182210.pdf](https://delcopa.gov/vote/pdf/2024/Hash_Results/Marple_3_1_S1903182210.pdf)

## **ARGUMENT**

19. MathNet.Numerics<sup>3</sup> is a type of software used specifically for applying algorithms in numerical computation and for the manipulation of data, which should never occur in the tabulation of votes, and for which there is no conceivable use or application in the administration of elections.

20. MathNet.Numerics is not authorized for use in elections by the EAC on the Hart Verity 2.7. Since the Pennsylvania Department of State has adopted the EAC standards for certification of voting machine systems used throughout the Commonwealth, it is a violation of the law for any jurisdiction in Pennsylvania to use voting machines on which unauthorized software has been installed.<sup>4</sup> Software not authorized by the EAC installed

<sup>3</sup> <https://numerics.mathdotnet.com/>

<sup>4</sup> <https://www.pa.gov/content/dam/copapwp-pagov/en/dos/programs/voting-and-elections/voting-systems/certification/Hart-Verity-Voting-2.7-Final-for-web.pdf>

on Delaware County's voting machines invalidates the certification of those machines granted by the Pennsylvania Department of State,

21. It is a violation of for Delaware County to run an election using machines. that are not identical to the ones the PA Department of State Certified<sup>5</sup>. It is illegal for Delaware County to proceed with the use of the Hart Verity 2.7 voting system in the November 5, 2024 general election. (Emphasis added).

### **Potential Harms**

22. Moreover, and more importantly, the use of machines containing MathNet.Numerics puts at risk the security and accuracy of the election. The potential harm in the use of uncertified machines, loaded with software that has the capability to use algorithms to manipulate election data, is self-evident, as candidates and the general public will be unable to trust the results of the election, or be sure that their vote was not diluted or that election data was not corrupted, altered, or even fabricated.
23. The questions we have to ask is why MathNet.Numerics has been installed in Delaware County's voting machines, and by whom? The why is obvious...to manipulate voter data. The "who" question is unclear, but there are only 3 possibilities as to who would have the means, motive, and opportunity to do so: 1 - The manufacturer, Hart Verity. 2 - A malignant insider with access. 3. An outsider with remote access to Delaware County's voting machines. Whoever did this, the fact remains that Delaware County cannot legally use the Hart Verity 2.7 machines in the upcoming election on November 5, and therefore the county must prepare for a hand counted tabulation.

### **Pre-requisites for a Preliminary Injunction**

24. In Pennsylvania, a party must establish the following six prerequisites to obtain a preliminary injunction.

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<sup>5</sup> <https://www.pa.gov/content/dam/copapwp-pagov/en/dos/programs/voting-and-elections/voting-systems/certification/Hart-Verity-Voting-2.7-Final-for-web.pdf> P28

- a. [The] injunction is necessary to prevent immediate and irreparable harm that cannot be adequately compensated by damages;
- b. [G]reater injury would result from refusing an injunction than from granting it, and concomitantly, that issuance of an injunction will not substantially harm other interested parties in the proceeding;
- c. [A] preliminary injunction will properly restore the parties to their status as it existed immediately prior to alleged wrongful conduct;
- d. [The] activity it seeks to restrain is actionable, that its right to relief is clear, and that the wrong is manifest or, in other words, must show that it is likely to prevail on its merits;
- e. [The] injunction it seeks is reasonably suited to abate the offending activity; and
- f. [A] preliminary injunction will not adversely affect the public interest.

Warehime v. Warehime, 860 A.2d 41, 46-47) (Pa. 2004) (internal quotations and citations omitted); see also ALL-PAK, Inc v. Johnston, 694, A.2d 347,350 (Pa Super Ct. 1997) (the purpose of a preliminary injunction is “the avoidance of irreparable injury or gross injustice until the legality of the challenged action can be determined.”)

25. Here, Petitioner can ably meet all six prerequisites.

The Injunction is Necessary to Prevent Immediate and Irreparable Harm

26. In the absence of a preliminary injunction, Delaware County will conduct a Federal Election with Hart Verity Voting 2.7 that has **Unauthorized Software** (emphasis added) on its system. Delaware County will conduct and complete a Federal Election on a system that is not compliant with the PA Department of State’s Certification. There will **NOT** be [emphasis added] confidence in the results of the election if Delaware County uses the system as is.

27. A preliminary injunction is necessary to avoid immediate and irreparable injury that cannot be remedied. All candidates, residents, taxpayers of Delaware County, residents of PA, citizens and candidates of the United States of America deserve to have a fair election.

Greater Injury Would Result from Refusing Injunction

28. Greater injury will result to the Petitioner, Voters of Delaware County, Taxpayers of Delaware County, Residents of Delaware County, Residents of PA, and Citizens of the USA will be injured by Respondent if the requested injunctive relief is not granted.
29. Specifically, if an injunction is not granted, a foreign entity or malicious insider (emphasis added) will have manipulated the results in a swing county, in a swing state and can probably determine the winner of the 2024 Presidential race.
30. By Contrast, Respondent will suffer no harm by the granting of the injunction and will ensure that the votes cast in the Federal Election will be **ACCURATELY** (emphasis added) tabulated as an error in any one county can swing the results of the state and of the country. Furthermore, the results of the state, and the 19 Electoral votes to either candidate for the Office of the President, which could mean the Office of Presidency for the next four years.

The Preliminary Injunction will Maintain the Parties in their Original Places

31. Granting the injunction will restore the status quo with respect to the Petitioner's constitutional and statutory rights as they existed prior the discovery of the illegal software.
32. If the injunction is granted, all Respondent would have to do is conduct the election results by a hand count, a tried and true method which was used for over 200 years.

Petitioner's are Likely to Prevail on the Merits

33. Petitioner's right to relief is clear, and there is a reasonable likelihood of success on the merit, as set forth in more detail in the Petition.

Injunction is Reasonably Suited to the Offending Activity

34. As the offending activity here, the existence of **unauthorized software** ( emphasis added) is evidence of illegal activity to influence the results of the 2024 Election.

The Public Will Not Be Adversely Affected by the Injunction

35. Respondent has control over all election activities in Delaware County. In execution of every election, respondent is required to follow federal law, state law, and Pennsylvania Department of State requirements. There is no adverse effect of hand-counting the ballots

36. Moreover, the requested relief enables the Respondent to comply with the Pennsylvania Election Law. **WHEREFORE**, Petitioner respectfully asks this Honorable Court to grant a Preliminary Injunction;

37. We ask this honorable court to stay the use of the Hart Intercivic Electronic Voting Systems until the issues raised herein have been adjudicated.

38. We ask this honorable court to stay the use of the Electronic Voting Systems that have been tested, quarantining them until the evidence can be analyzed by the FBI and DHS because it is apparent that a either a foreign agent or a malicious insider has violated the Chain of Custody of the Electronic Voting System in accordance with Exhibit A.

39. We ask this honorable court for the Performing of a proper Trusted Build validation on the remaining Electronic Voting machines and if that program is present.

40. We ask this honorable court to Direct the Respondent to take all reasonable steps possible to notify the public, candidates, voters, taxpayers, residents, and the Pennsylvania Department of State of the existence of this litigation, and the deficiency of the Respondent in the Election Process.

41. Entering such other relief as this Court deems just and proper.

Date: \_\_\_/\_\_\_/2024

\_\_\_\_\_  
**Alfeia Goodwin, Pro Se**

**117 Abbey Terrace**

**Drexel Hill, PA 19026**

**Alfeia@mail.com**

**267-977-0757**



)  

---

**Robert Mancini, Pro Se**

**4 Guernsey Lane**

**Media PA 19063**

**Delcocyber@gmail.com**

**610-506-9827**

**CERTIFICATE OF COMPLIANCE**

I certify that this filing conforms with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania case records of the Appellate and Trial Courts that require the filing of confidential information and documents differently than non-confidential information and documents.

---

Alfeia Goodwin

---

Robert Mancini

VERIFICATION

Robert Mancini states is making this verification. I verify that the statements are true and correct to the best of my knowledge, information, and belief. I understand that false statements made herein are subject to the penalties of 18 PA. C.S,Subsection 4904, relating to unsworn falsification to authorities

Date : 09 September 2024

---

Robert Mancini

Alfeia Goodwin states is making this verification. I verify that the statements are true and correct to the best of my knowledge, information, and belief. I understand that false statements made herein are subject to the penalties of 18 PA. C.S,Subsection 4904, relating to unsworn falsification to authorities

Date : 9 September 2024

---

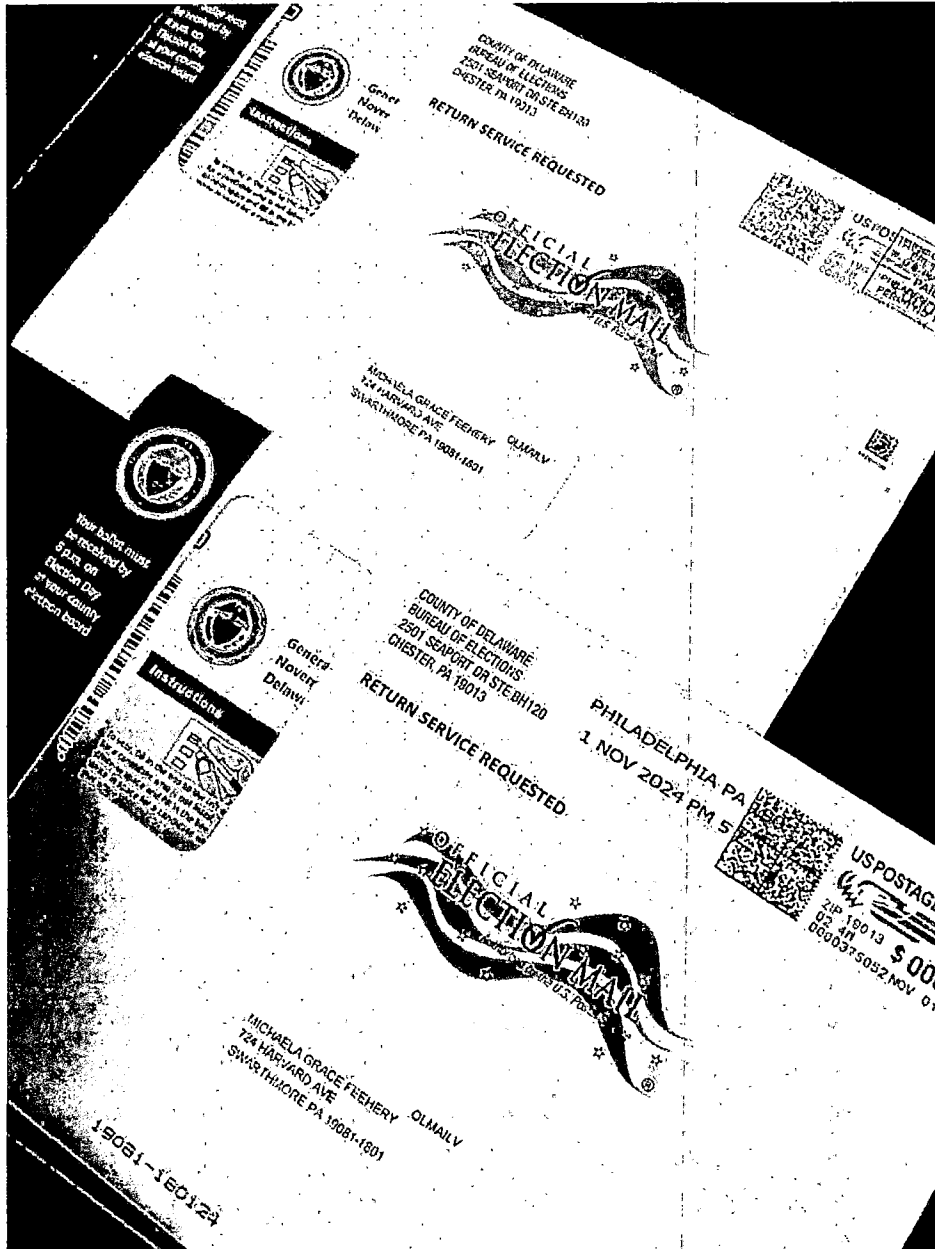
Alfeia Goodwin

# EXHIBIT

“B”

EXHIBIT Duplicate Ballot Delivery

1. Image of two ballots sent to Michaela Feehery  
(Can produce others if required, but dual receipt of ballots was not uncommon)



# EXHIBIT

“C”

1. Current records confirming votes received and counted by ineligible MIB recipients whose names and ineligible status were given to the Respondents in September of 2024:

FVE 11/11/24	ID Number	Last Name	First Name	Middle Name	Date Of Birth	address	City	Last Date Voted
	009960445-23	SPATA	JOHN	C	1955-07-16	133 HAMPDEN RD	UPPER DARB	2024-11-05
	010152492-23	MAZZOLA	JASMINE	TENAE	1979-03-17	119 E TURNBULL AVE	HAVERTOWN	2024-11-05
	102491695-23	NILSSON	NINA	LOUISE	1951-04-23	135 TROUT RUN MEWS W	MEDIA	2024-11-05
	103813640-23	SUMMERS	JOSEPH	EDWARD	1978-04-19	96 CHEW LN	WAYNE	2024-11-05
	103934164-23	TRAUOGOTT	ERIC	M	1983-11-15	5 JAMES GETTY LN	GLEN MILLS	2024-11-05
	103947075-23	LIN	CHARLIE	SHENG	1937-05-11	801 YALE AVE	SWARTHMORE	2024-11-05
	108746925-23	COLLINS	DANIEL	RAYMOND	1992-11-10	407 VIRGINIA LN	ASTON	2024-11-05
	108907781-23	MCDORMAN	GLENNDON	LUCAS	1978-01-12	1602 ROBINSON AVE	HAVERTOWN	2022-11-08
	110236213-23	CARDOSO	MIQUEL	CLAUDIO	1978-03-04	444 HAMPSHIRE RD	DREXEL HILL	2024-04-23
	110518303-23	BRUDY	MITCHELL	E	1993-01-25	100 BLACK HORSE LN	MEDIA	2024-11-05

MIB - 11/15/24 - 4pm	IDNumber	LastName	FirstName	Addr1	CSZ	ElectionName	MailApplication	ID verification sta	Ballot App	Dispositio	Perm Indicat	BallotSentDa	BallotReturn	Ballot stat	Ballot status reason
	009960445-23	SPATA	JOHN	651 N HARRIS	ATLANTIC CI	2024 GENERAL ELECTION	MAILIN	1	Approved	APPR - ID 1		2024-10-02	2024-10-14	Vote Recd	RECORD - BALLOT RETURN
	016152492-23	MAZZOLA	JASMINE	119 E TURNB	HAVERTOWN	2024 GENERAL ELECTION	OLMAILNV	1	Approved	APPR - ID 1		2024-10-02	2024-10-10	Vote Recd	RECORD - BALLOT RETURN
	102491695-23	NILSSON	NINA	135 TROUT R	MEDIA, PA 1	2024 GENERAL ELECTION	MAILIN	1	Approved	APPR - ID 1		2024-10-02	2024-10-07	Vote Recd	RECORD - BALLOT RETURN
	103813640-23	SUMMERS	JOSEPH	96 CHEW LN	WAYNE PA 1	2024 GENERAL ELECTION	OLMAILV	1	Approved	APPR - ID 1		2024-10-02	2024-10-09	Vote Recd	RECORD - BALLOT RETURN
	103934164-23	TRAUOGOTT	ERIC	5 JAMES GET	GLEN MILLS	2024 GENERAL ELECTION	OLMAILNV	1	Approved	APPR - ID 1		2024-10-02	2024-10-14	Vote Recd	RECORD - BALLOT RETURN
	103947075-23	LIN	CHARLIE	801 YALE AV	SWARTHMOR	2024 GENERAL ELECTION	MAILIN	1	Approved	APPR - ID 1		2024-10-02	2024-10-09	Vote Recd	RECORD - BALLOT RETURN
	108746925-23	COLLINS	DANIEL	407 VIRGINIA	ASTON PA 19	2024 GENERAL ELECTION	OLMAILNV	1	Approved	APPR - ID 1		2024-10-02	2024-10-18	Vote Recd	RECORD - BALLOT RETURN
	108907781-23	MCDORMAN	GLENNDON	1602 ROBIN	HAVERTOWN	2024 GENERAL ELECTION	MAILIN	1	Approved	APPR - ID 1		2024-10-02		Pending	PEND - NOT YET RETURN
	110236213-23	CARDOSO	MIQUEL	444 HAMPSH	DREXEL HILL	2024 GENERAL ELECTION	OLMAILNV	1	Approved	APPR - ID 1		2024-10-02		Cancelled	CANC - UNDELIVERABLE
	110519303-23	BRUDY	MITCHELL	100 BLACKH	MEDIA PA 19	2024 GENERAL ELECTION	OLMAILNV	1	Approved	APPR - ID 1		2024-10-02	2024-10-09	Vote Recd	RECORD - BALLOT RETURN

2. Email sent to Respondents on 9.11.2024 regarding ineligible MIB recipients:

John Proctor Child  
 308 Rockingham Road  
 Bryn Mawr PA 19010  
 610-203-6458  
 JohnBuysProperty@Gmail.com

September 11, 2024

Dr. Monica Taylor, Chair  
 Delaware County Council  
 Government Center Building  
 201 W Front Street  
 Media PA 19063-2728

Re: Request for Investigation into Possible Election Law Violations in Delaware County, Pennsylvania –

September 11th- First Batch... attached are 13 Delco Registrants who are also Registered to vote in other states who have also been approved for Penna Mail In Ballots.

Dear Ms. Taylor,

I am writing to bring to your attention a matter of significant concern regarding potential violations of election laws in Delaware County, Pennsylvania. As a concerned resident and registered voter, I believe that certain actions taken by the County Board of Elections may constitute a breach of fiduciary duty and a violation of the Pennsylvania Election Code, specifically Section 1300 (25 P.S. § 3146.1).

### **Details of the Concern**

In reviewing public records available on official government websites, I have discovered that the Delaware County Board of Elections has approved mailing absentee or mail-in ballots to individuals who reside and are currently registered to vote in other states. This appears to be in direct violation of Section 1300 of the Pennsylvania Election Code, which regulates the issuance of absentee and mail-in ballots.

### **Relevant Section:**

Section 1300 (25 P.S. § 3146.1): This section outlines the eligibility criteria for absentee and mail-in ballots, specifically stating that they must be issued only to qualified electors who are residents of the county where the ballot is requested.

The following evidence supports my concern:

**Change of Address:** Public records indicate that specific individuals who are slated to receive ballots by the Delaware County Board of Elections have officially changed their address and are no longer residents of Delaware County. These individuals have established residency in other states.

**Out-of-State Voter Registration:** Public records also confirm that these individuals are registered to vote in states other than Pennsylvania. (See Attached Evidence from the State Voter Sites).

**Approval to Receive Mail-In Ballots:** Records from the Harrisburg Bureau of Elections, Division of Election Security and Technology demonstrate that these individuals were approved to receive mail-in ballots despite their out-of-state registration.

### **Request for Action**

In light of these concerns, I respectfully request that Delaware County initiate an investigation into the practices of the Delaware County Board of Elections. Specifically, I ask that you:

- Investigate the issuance of absentee and mail-in ballots to individuals who are not qualified electors of Delaware County, as defined by Section 1300 (25 P.S. § 3146.1) of the Pennsylvania Election Code.



- Determine whether these actions constitute a violation of Pennsylvania Election Code or any other relevant election laws.
- Take appropriate legal action to prevent further violations and ensure that all election processes adhere to the laws and standards set forth by the Commonwealth of Pennsylvania.

I believe that protecting the integrity of our electoral process is of utmost importance. I trust that your office will take these concerns seriously and will act swiftly to address any potential violations of the law. I am available to provide further information or clarification regarding this matter, and I would be grateful for your prompt attention to this issue.

Thank you for your time and consideration.

Sincerely,

John Proctor Child  
Delaware County Election Deep Divers  
& Elected Precinct Committeeman Radnor 7-2

Cc:

Richard Womack (Vice Chair): [WomackR@co.delaware.pa.us](mailto:WomackR@co.delaware.pa.us)

Kevin Madden: [MaddenK@co.delaware.pa.us](mailto:MaddenK@co.delaware.pa.us)

Elaine Paul Schaefer: [SchaeferE@co.delaware.pa.us](mailto:SchaeferE@co.delaware.pa.us)

Christine A. Reuther: [ReutherC@co.delaware.pa.us](mailto:ReutherC@co.delaware.pa.us)

James Allen, Director of Elections, [AllenJ@co.delaware.pa.us](mailto:AllenJ@co.delaware.pa.us)

Ashley Lunkenheimer (Chair): [DelcoElection@co.delaware.pa.us](mailto:DelcoElection@co.delaware.pa.us)

John McBlain: [DelcoElection@co.delaware.pa.us](mailto:DelcoElection@co.delaware.pa.us)

Scott Alberts: [DelcoElection@co.delaware.pa.us](mailto:DelcoElection@co.delaware.pa.us)

Jonathan Lichtenstein, Delaware County Solicitor, [LichtensteinJ@co.delaware.pa.us](mailto:LichtensteinJ@co.delaware.pa.us)

John Proctor Child  
Delaware County Election Deep Diver  
& Elected Precinct Committeeman, Radnor Twp 7-2  
308 Rockingham Road; Garrett Hill PA. 19010  
JohnBuysProperty@Gmail.com \* 610-203-6458

3. Registration of these applicants as active voters in other states before and after the election:

John Spata  
Pre-election  
NJ Registration  
Active

DATE: 5/17/15 10:08 AM

RD DOE - Division of Elections - New Jersey Results

← Voter Search | My Voter Information

### Search Results

If you're having trouble finding your voter record, your current status is inactive, or you have any questions, please contact your County Commissioner of Registration here.

<b>JOHN C SPATA</b>	City
Date of Birth 07/1955	Atlantic City
Registration Effective Date 05/07/2015	County Atlantic
Current Registration Status Active	Voter ID B0448353565

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John Spata  
Post Election  
NJ Registration  
Active

Department of State  
**New Jersey Division of Elections**  
The Hon. Tahesha Way, Secretary of State

DOS	DOE	Register to Vote!	Am I Registered?	Voting Information	Candidate Information	County Information	Election Information	Publications
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← Voter Search | My Voter Information

### Search Results

If you're having trouble finding your voter record, your current status is inactive, or you have any questions, please contact your County Commissioner of Registration here.

<b>JOHN C SPATA</b>	City
Date of Birth 07/1955	Atlantic City
Registration Effective Date 05/07/2015	County Atlantic
Current Registration Status Active	Voter ID B0448353565

Jasmine Mazzola  
Pre-election  
MD Registration  
Active

**My Voter Registration Record**

NOTE: This is not an official proof of registration. This is for informational purposes only.

**Do you need to show ID when you vote?** No

**Voter Name:** Jasmine Tenae Mazzola

**Residential Address:** 505 Fleetwood St  
Silver Spring, MD 20910

**Mailing Address:** SAME AS RESIDENTIAL

**Party Affiliation:** Unaffiliated

**Registration Date:** 5/30/1997

---

**Voting Center Information**

**Polling Place:** Sligo Creek Elementary School

**Address:** 500 Schuyler Road  
Silver Spring, MD 20910

**Election Day Hours:** 2024 PRESIDENTIAL GENERAL ELECTION  
11/5/2024 - 7 am to 8 pm

**Directions:** [Get Directions](#)

**Accessibility Issues:**

**Early Voting:** [Learn more about early voting](#)

Early voting: Oct 24 - Oct 31 from 7 am to 8 pm  
Early voting locations map:

http://voterservices.elections.maryland.gov/VoterResults 1/4

Jasmine Mazzola  
Post Election  
MD Registration  
Active



### Voter Lookup

▼ My Voter Registration Record

**Do you need to show ID when you vote?** No

**Voter Name:** Jasmine Tenae Mazzola

**Residential Address:** 505 Fleetwood St  
Silver Spring, MD 20910

**Mailing Address:** SAME AS RESIDENTIAL

**Party Affiliation:** Unaffiliated

**Registration Date:** 5/30/1997

If you want to update or change any of this information, you can do it [online](#) or [by mail](#). You must submit your changes at least 3 weeks before an election.

Nina Nilsson  
Pre-election  
KY Registration  
Active



### Voter Information Center

**Voter Information**  
The following is your current voter registration information on file.  
You may update your registration using the [Online Voter Registration portal](#).

Full name:	NINA LOUISE NILSSON	
Address:	3257 BRIGHTON PLACE DR LEXINGTON, KY 40509-2314	
Political Party:	DEMOCRATIC	

**Your Precinct and Districts**

Precinct:	SHEFFIELD PLACE (C193)	
City Code:		
School District:		
County:	Fayette	<a href="#">County Clerk Website</a>
House District:	088	<a href="#">View Members</a>
Senate District:	34	<a href="#">View Members</a>
Congressional District:	6	<a href="#">View Members</a>
US Senators:	<a href="#">View Members</a>	

**Mail-In Absentee Ballot Status**  
To request a mail-in absentee ballot [Click Here](#).  
The Absentee Ballot Portal Opens September 21, 2024.

**Polling Places**  
You can vote at any one of the following locations on Election Day.

THE BAPTIST CHURCH AT ANDOVER 3330 TODD'S RD, LEXINGTON, KY 40508
BEAUMONT BRANCH LIBRARY 3007 FIELDSTONE WAY, LEXINGTON, KY 40513
CENTRAL LIBRARY 140 E MAIN ST, LEXINGTON, KY 40507
EASTSIDE BRANCH LIBRARY 3000 BLU-E JAMES DR, LEXINGTON, KY 40503
MARYCELIA BRANCH LIBRARY 2197 VERSAILLES RD, LEXINGTON, KY 40504
NORTH-SIDE BRANCH LIBRARY

Logo/Screen shot by gary947687@gmail.com

Nina Nilsson  
Post Election  
KY Registration  
Active



### Voter Information Center

### Voter Information Center

**Voter Information**  
The following is your current voter registration information on file.  
You may update your registration using the [Online Voter Registration portal](#).

Full name:	NINA LOUISE NILSSON	
Address:	3257 BRIGHTON PLACE DR LEXINGTON, KY 40509-2314	
Political Party:	DEMOCRATIC	

**Your Precinct and Districts**

Precinct:	SHEFFIELD PLACE (C193)	
City Code:		
School District:		
County:	Fayette	<a href="#">County Clerk Website</a>
House District:	088	<a href="#">View Members</a>
Senate District:	34	<a href="#">View Members</a>
Congressional District:	6	<a href="#">View Members</a>
US Senators:	<a href="#">View Members</a>	

**Mail-In Absentee Ballot Status**  
To request a mail-in absentee ballot [Click Here](#).

Election:	2024 General Election [11/5/2024]	
Status:	You have not yet requested a ballot.	

**Primary Election Eligibility**  
If NO, you are still eligible to vote in non-partisan races if any exist.

Am I eligible to vote in my party's Primary Election?	Yes
---	-----



Joseph Summers  
Pre-election  
TX Registration  
Active

<p><b>Voter Information</b></p> <p>Name: JOSEPH EDWARD SUMMERS          Address: 4213 WREN COURT          GRAND PRAIRIE TX 75052          Gender: MALE          Valid From: 01/01/2024          Effective Date of Registration: 06/22/2005          Voter Status: ACTIVE          County: DALLAS          Precinct: 4519          VUID: 1688385014</p> <p><a href="#">Change your Address</a></p>	<p><b>Upcoming Elections (Select Election for available polling information)</b></p> <p>11/05/2024-2024 NOVEMBER 5TH GENERAL ELECTION</p>
---	---

\*\*Eligibility is determined by Effective Date of Registration (Must be on or before Election Day)

Please Note: Polling places are subject to change. Always check your designated polling place location via this website or by contacting your county prior to going to vote.

**ADDITIONAL QUESTIONS and FAQ**

Note: Any questions now that you see your voter registration status? On Suspense? Don't live at that address anymore? Not sure what to do next? Check out our FAQ

[Back](#)

<https://teamrv.mvp.sos.texas.gov/MV/VoterDetails.do>

Joseph Summers  
Post Election  
TX Registration  
Active



<p><b>Voter Information</b></p> <p>Name: JOSEPH EDWARD SUMMERS          Address: 4213 WREN COURT          GRAND PRAIRIE TX 75052          Gender: MALE          Valid From: 01/01/2024          Effective Date of Registration: 06/22/2005          Voter Status: ACTIVE          County: DALLAS          Precinct: 4519          VUID: 1688385014</p> <p><a href="#">Change your Address</a></p>	<p><b>Upcoming Elections (Select Election for available polling information)</b></p>
---	--

\*\*Eligibility is determined by Effective Date of Registration (Must be on or before Election Day)

Please Note: Polling places are subject to change. Always check your designated polling place location via this website or by contacting your county prior to going to vote.

**ADDITIONAL QUESTIONS and FAQ**

Note: Any questions now that you see your voter registration status? On Suspense? Don't live at that address anymore? Not sure what to do next? Check out our FAQ

[Back](#)

SKIP TO MAIN CONTENT

### Poll Site, Registration, and Absentee Ballot Information

Eric Traugott  
Pre-election  
NY Registration  
Active

**Polling Place Information**

**Early Voting Poll Site**

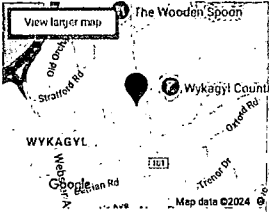
You can vote at any of the following polling places. Please select a polling place from the list below for the complete details. If you have any questions, follow this link through to your [County Board of Elections \(https://publicreporting.elections.ny.gov/CountyBoardRoster/CountyBoardRoster?county\\_in=Westchester\)](https://publicreporting.elections.ny.gov/CountyBoardRoster/CountyBoardRoster?county_in=Westchester) website.

Select early voting polling place

**Election Day Poll Site**

This is the current polling place assigned to "120 WYKAGYL TER, NEW ROCHELLE 10804" by your County Board of Elections as of 08/27/2020

**NEW ROCHELLE UNITED METHODIST CHURCH**  
 1200 NORTH AVE  
 NEW ROCHELLE, 10804 [Get Directions \(https://www.google.com/maps/place/1200+NORTH+AVE,NEW+ROCHELLE,+10804\)](https://www.google.com/maps/place/1200+NORTH+AVE,NEW+ROCHELLE,+10804)



**Voter Information**

Name : TRAU GOTT, ERIC M  
 Address : 120 WYKAGYL TER, NEW ROCHELLE 10804

https://voterlookup.elections.ny.gov

1/2

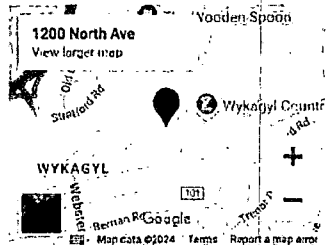
Eroc Traugott  
Post Election  
NY Registration  
Active

**Early Voting Poll Site**

**Election Day Poll Site**

This is the current polling place assigned to "120 WYKAGYL TER, NEW ROCHELLE 10804" by County Board of Elections as of 08/27/2020

**NEW ROCHELLE UNITED METHODIST CHURCH**  
 1200 NORTH AVE  
 NEW ROCHELLE, 10804 [Get Directions](#)



**Voter Information**

Name : TRAU GOTT, ERIC M  
 Address : 120 WYKAGYL TER, NEW ROCHELLE 10804  
 Mailing Address (if any) :  
 Political Party : Not enrolled in a party  
 Voter Status : Active

**Voter District Information**

Election District : 36  
 County Legislative District : 10  
 Senate District : 37  
 Assembly District : 88  
 Congressional District : 16  
 Town : NEWR  
 Ward :

New Search

000027

Charlie Lin  
Pre-election  
KY Registration  
Active



Voter Information Center

**Voter Information**

The following is your current voter registration information on file.  
You may update your registration using the [Online Voter Registration portal](#).

Full name:	CHARLIE SHENG LIN
Address:	3354 PIMLICO PKWY LEXINGTON, KY 40517-2841
Political Party:	REPUBLICAN

**Your Precinct and Districts**

Precinct:	FAIRWAY (B110)
City Code:	
School District:	
County:	Fayette <a href="#">County Clerk Website</a>
House District:	093 <a href="#">View Members</a>
Senate District:	13 <a href="#">View Members</a>
Congressional District:	6 <a href="#">View Members</a>
US Senators:	<a href="#">View Members</a>

**Mail-In Absentee Ballot Status**

To request a mail-in absentee ballot [Click Here](#).

The Absentee Ballot Portal Opens September 21, 2021.
--

**Polling Places**

You can vote at any one of the following locations on Election Day.

TATES CREEK ELEMENTARY SCHOOL 1113 CENTRE PKWY, LEXINGTON, KY 40517
BEALMORIT BRANCH LIBRARY 3080 FIELDSTONE WAY, LEXINGTON, KY 40513
CENTRAL LIBRARY 140 E MAIN ST, LEXINGTON, KY 40507
EASTSIDE BRANCH LIBRARY 3000 BLAKE JAMES DR, LEXINGTON, KY 40509
MARKSBURY BRANCH LIBRARY 2197 VERSAILLES RD, LEXINGTON, KY 40504
NORTHSIDE BRANCH LIBRARY

Charlie Lin  
Post Election  
KY Registration  
Active



Voter Information Center

**Voter Information**

The following is your current voter registration information on file.  
You may update your registration using the [Online Voter Registration portal](#).

Full name:	CHARLIE SHENG LIN
Address:	3354 PIMLICO PKWY LEXINGTON, KY 40517-2841
Political Party:	REPUBLICAN

**Your Precinct and Districts**

Precinct:	FAIRWAY (B110)
City Code:	
School District:	
County:	Fayette <a href="#">County Clerk Website</a>
House District:	093 <a href="#">View Members</a>
Senate District:	13 <a href="#">View Members</a>
Congressional District:	6 <a href="#">View Members</a>
US Senators:	<a href="#">View Members</a>

**Mail-In Absentee Ballot Status**

To request a mail-in absentee ballot [Click Here](#).

Election:	2024 General Election [11/5/2024]
Status:	You have not yet requested a ballot.

**Primary Election Eligibility**

If NO, you are still eligible to vote in non-partisan races if any exist.

Am I eligible to vote in my party's Primary Election?	Yes
---	-----

Daniel Collins  
Pre-election  
NJ Registration  
Active

02/20/2012 4:43 PM

NJ DOE - Division of Elections - Voter Search Results

OFFICIAL SITE OF THE STATE OF NEW JERSEY

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### Search Results

If you're having trouble finding your voter record, your current status is inactive, or you have any questions, please contact your County Commissioner of Registration [here](#).

**DANIEL RAYMOND COLLINS**

**Date of Birth**  
11/1992  
**Registration Effective Date**  
02/14/2012  
**Current Registration Status**  
Active

**City**  
Berkeley Township  
**County**  
Ocean  
**Voter ID**  
F577355312

http://www.state.nj.gov/elections/choice/register/active-doe.html#additional-information-0000-115110517092

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Daniel Collins  
Post Election  
NJ Registration  
Active



OFFICIAL SITE OF THE STATE OF NEW JERSEY

Governor Phil Murphy • Lt. Governor Tahesha Way  
[NJ.gov](#) | [Services](#) | [Agencies](#) | [FAQs](#) | [Transparency](#) | [Search](#)

Department of State  
**New Jersey Division of Elections**  
The Hon. Tahesha Way, Secretary of State

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[County  
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### Search Results

If you're having trouble finding your voter record, your current status is inactive, or you have any questions, please contact your County Commissioner of Registration [here](#).

**MITCHELL E BRUDY**

**Date of Birth**  
01/1993  
**Registration Effective Date**  
03/10/2011  
**Current Registration Status**  
Active

**City**  
Stafford Township  
**County**  
Ocean  
**Voter ID**  
02451953258

000029



Mitchel Brudy  
Pre-election  
NJ Registration  
Active

[← Voter Search](#) | [My Voter Information](#)

### Search Results

If you're having trouble finding your voter record, your current status is inactive, or you have any questions, please [contact your County Commissioner of Registration here.](#)

**MITCHELL E BRUDY**  
Date of Birth  
01/1993  
Registration Effective Date  
03/10/2011  
Current Registration Status  
Active

City  
Stafford Township  
County  
Ocean  
Voter ID  
D2451953258

<https://voter.nj.gov/voteresults/lookup?firstName=MITCHELL&lastName=Brudy&city=Stafford&county=Ocean>

1/2

Mitchell Brudy  
Post Election  
NJ Registration  
Active

Department of State  
**New Jersey Division of Elections**  
The Hon. Tahesha Way, Secretary of State

<a href="#">DOS</a>	<a href="#">DOE</a>	<a href="#">Register to Vote!</a>	<a href="#">Am I Registered?</a>	<a href="#">Voting Information</a>	<a href="#">Candidate Information</a>	<a href="#">County Information</a>	<a href="#">Election Information</a>	<a href="#">Publications</a>
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[← Voter Search](#) | [My Voter Information](#)

### Search Results

If you're having trouble finding your voter record, your current status is inactive, or you have any questions, please [contact your County Commissioner of Registration here.](#)

**DANIEL RAYMOND COLLINS**  
Date of Birth  
11/1992  
Registration Effective Date  
02/14/2012  
Current Registration Status  
Active

City  
Berkeley Township  
County  
Ocean  
Voter ID  
F5773553312

# EXHIBIT

“D”

**John Proctor Child**

Elected Republican Committeeman, Radnor 7-2  
308 Rockingham Road  
Bryn Mawr, PA 19010  
610-203-6458  
JohnBuysProperty@gmail.com

**Euphrosyne (Joy) Schwartz**

Elected Republican Committeewoman, Upper Darby 3-3  
[jschwartzpro@gmail.com]

**Paul Rumley**

Elected Republican Committeeman, Springfield 2-2  
[perumley@gmail.com]

**Kathryn Buckley**

Candidate for Pennsylvania State Representative, 168th Legislative District  
Elected Republican Committeewoman, Edgmont 2-5  
[kathy1070@comcast.net]

**Dr. Alfeia DeVaughn-Goodwin, PhD.**

Candidate for United States Representative for Pennsylvania, 5th Congressional District  
[alfeia@mail.com]

**October 7, 2024**

**Dr. Monica Taylor**, Chair, Delaware County Council  
Government Center Building  
201 W Front Street  
Media, PA 19063-2728

**Ashley Lunkenheimer**, Chair, Delaware County Board of Elections  
**Scott Alberts**, Member, Delaware County Board of Elections  
**John M. McBlain**, Member, Delaware County Board of Elections  
**James P. Allen**, Director of Elections, Delaware County Bureau of Elections  
**Elaine Paul Schaefer**, Vice Chair, Delaware County Council  
**Christine A. Reuther**, Member, Delaware County Council  
**Richard Womack**, Member, Delaware County Council  
**Kevin Madden**, Member, Delaware County Council

**Re: Legal Notice – Failure to Comply with Pennsylvania Election Law and Unlawful Observer Restrictions for Logic and Accuracy Testing**

Dear Dr. Taylor, Mr. Allen, and Members of the Delaware County Council and Board of Elections,

We are writing to express significant concerns regarding the restrictions and inconsistencies in public observation during the Logic and Accuracy (L&A) testing of election machines. These practices, as currently enforced, not only limit public access but fail to comply with Pennsylvania Election Law. Our concerns, outlined below, include arbitrary restrictions on observers, inconsistent enforcement of rules, limitations on visibility and documentation tools, inconsistencies across different testing phases and failure to provide adequate public notice of rules and deadlines. We believe these issues must be addressed promptly to ensure transparency and public confidence in the election process.

Below, we detail the relevant laws that govern these processes, alongside specific concerns with the current practices.

**Pennsylvania Election Code, Section 310, 25 P.S. § 2650**

*Any party or political body or body of citizens which now is, or hereafter may be, entitled to have watchers at any registration, primary, or election, shall also be entitled to appoint watchers who are qualified electors of the county or attorneys to represent such party or political body or body of citizens at any public session or sessions of the county board of elections, and at any computation and canvassing of returns of any primary or election and recount of ballots or recanvass of voting machines under the provisions of this act. Such watchers or attorneys may exercise the same rights as watchers at registration and polling places, but the number who may be present at any one time may be limited by the county board to not more than three for each party, political body, or body of citizens.*

**Pennsylvania Election Code, 25 P.S. § 2642(f)**

*The county board of elections may make regulations, not inconsistent with law, as it may deem necessary for the guidance of voting machine custodians, elections officers, and electors. The county board of elections shall make and issue such rules and regulations, not inconsistent with law, as will be necessary for the conduct of elections and primaries and for the preparation and counting of ballots and the tabulation of votes, and for the use of voting machines in districts in which they are used. The county board may also make reasonable rules and regulations concerning the conduct of those members of the public who desire to attend such computation of returns as are required to be made public by the provisions of this act, but such rules shall not deny to any member of the public the right to be present.*

**2024 PA Directive on Logic & Accuracy Testing (Excerpts)**

*Under Section 1110-A(d) of the Election Code, 25 P.S. § 3031.10(d), no later than forty (40) days before an election, the county election board must mail a written notice stating the date, time, and location when L&A testing will begin to:*

*The chairman of each political party recognized to participate in a primary election within the county; and*

*The chair or presiding officer of any citizens' organization which has registered its name and address at least fifty (50) days before such election.*

*Further, county boards should provide at least forty-eight (48) hours 'notice to the public of the time and place of the test to provide the public an opportunity to attend. The public notice:*

*May be placed in a newspaper or legal publication that has a countywide distribution;  
Should outline the starting time and location of the testing; and  
Need not include an ending time for the testing.*

*The preparation and testing of voting equipment must be open to the public to observe; however, such members of the public shall not in any manner interfere with the preparation and testing of the voting equipment units. To prevent any interference by the public when observing, the county may make reasonable rules and regulations concerning the conduct of those members of the public who wish to observe. These rules shall not prevent members of the public from fairly observing and should be published after public approval by the elections board subject to 25 P.S. § 2642(f).*

*As described above in section 3.1, the county board of elections may establish reasonable rules and regulations for public observation of L&A testing. The board must also be available during the first day of preparation, at the beginning of the day or for the first hour of public observation, to explain the process and respond to questions. The following practices must be observed:*

*Administer an oath to those persons conducting the L&A tests who are not permanent elections staff.*

*Establish an area where the public can observe the process.*

*Allow only election officials and those conducting tests into the testing area.*

*Prohibit the photo copying of any testing reports or other materials.*

*Prohibit photographic and audio equipment, including cellphone cameras, from being used to record security seals or serial numbers. While the news media may report on the testing process, counties must ensure that security seals, serial numbers, locks, and other details concerning security measures are not recorded or displayed.*

## **Concerns Regarding Current Practices and Legal Violations**

### **1. Restrictions on Public Access and the One-Observer Rule**

The current restriction limiting watchers to only one per party or group during L&A testing directly contradicts Pennsylvania law. **25 P.S. § 2650**, which clearly permits up to three watchers per group at public election sessions, including L&A testing. The arbitrary limitation to one watcher undermines public transparency and restricts meaningful oversight, especially for smaller groups or unaffiliated individuals. These citizens, without group affiliation, are effectively excluded from observing the process.

The intent of the law is clear: public access must be equitable and inclusive of both groups and individuals. Restricting access to one watcher violates the very principles of transparency that Pennsylvania Election Law seeks to uphold.

**2. Inconsistent Enforcement of Watcher Rules and Deadlines:** The selective enforcement of rules and deadlines for watcher access is a serious concern. We understand that some groups were permitted to make last-minute changes to their

watcher lists after the 50-day deadline, while others were denied this leniency. Moreover, there is no legal basis in the Pennsylvania Election Code for prohibiting individuals from representing more than one group. Such arbitrary and inconsistent enforcement violates the principles of fairness and transparency established by **25 P.S. § 2642(f)**. Furthermore, the selective application of rules prohibiting individuals from representing more than one group—without any legal basis—creates further inequity. This discrepancy in enforcement undermines the fairness of the process, particularly when these rules were not publicized on the official county website, as required for public transparency. Such selective enforcement erodes trust in the process and undermines the credibility of election procedures.

**3. Restrictions on Visibility and Documentation Tools:** The prohibition of phones, binoculars, and personal belongings such as pocket books during L&A testing prevents observers from fully documenting or effectively viewing the process, directly undermining the purpose of public observation as required by **25 P.S. § 2642(f)**. In addition, critical information displayed on computer screens is not visible to observers, preventing them from verifying that the machines are being tested correctly. This includes confirming that optical scanners are not left in "test mode," which would invalidate the testing. Pennsylvania Election Law requires transparency in the testing process, and **25 P.S. § 2642(f)** mandates that any rules must not prevent observers from fairly monitoring the procedure. The current restrictions on visibility and documentation fail to meet this legal standard. Moreover, the directive's prohibition against accessing serial numbers while still requiring observers to log these numbers creates an inconsistency that could further limit meaningful observation.

If these restrictions prevent effective observation, they undermine the very purpose of public access. In such cases, Pennsylvania Election Law, which prioritizes transparency and public oversight, must take precedence. While the **2024 PA Directive** allows counties to set "reasonable rules" to prevent interference, such rules must not impede fair observation. By prohibiting tools that aid visibility and documentation, the directive risks contradicting the law's core intent to ensure transparency in testing. Security measures must strike a balance that upholds the right to open observation without hindering election integrity or public confidence.

**4. Inconsistency in Watcher Rules Between Testing Phases:** The observation rules for L&A testing should align with those applied to other phases, such as hash testing. **25 P.S. § 2642(f)** mandates public transparency across all election procedures, yet the recently observed rules for L&A testing were significantly more restrictive than those for hash testing. This disparity creates confusion and undermines the Election Code's intent to ensure transparency throughout the election process. Such arbitrary limitations during L&A testing compromise public trust and are inconsistent with the law's provisions for open observation.

**5. Public Notice of Rules and Deadlines:** The failure to provide adequate public notice, particularly on the Delaware County government website, constitutes a violation of **25 P.S. § 3514(d)** of the Election Code, which requires that election-related notices, especially those regarding public sessions such as L&A testing, be made publicly

available. Sole reliance on newspaper notices, in an age where most citizens depend on online sources for information, does not fulfill this legal requirement. The **2024 PA Directive** further emphasizes the necessity for counties to provide notice, including online publication, to ensure transparency and enable public participation. Without easily accessible information regarding observer deadlines and rules, the public is deprived of their right to meaningfully engage in the oversight process, further eroding confidence in the election's transparency.

## Legal Consequences for Continued Noncompliance

The current restrictions fail to meet the legal standard of reasonableness and violate Pennsylvania Election Law by limiting public access, enforcing rules arbitrarily, and restricting visibility during the testing process. These actions not only violate the law but also erode public trust in the integrity of the elections.

We are prepared to pursue legal action should these unreasonable restrictions persist. These actions may include:

- **Filing a Writ of Mandamus** to compel the Delaware County Board of Elections to adhere to Pennsylvania Election Law and provide appropriate access to observers during L&A testing.
- **Seeking Civil and Criminal Investigations** into breaches of fiduciary duty and violations of election law by those responsible for these restrictions.
- **Pursuing Civil Rights Litigation** for disenfranchisement and violations of the Equal Protection Clause of the 14th Amendment if the continued restrictions result in unequal access to the election process.
- **Filing a Bill of Complaint** to address systemic issues and fiduciary breaches by Jim Allen, the members of Board of Elections and the members of the County Council, seeking accountability and legal remedies for long-term noncompliance.

## Requested Corrective Actions

To avoid these legal outcomes and ensure compliance with the law, we request the following corrective actions:

**Remove Arbitrary Restrictions on Public Access:** Ensure that both individual citizens and groups are granted fair and reasonable access to observe L&A testing, in compliance with **25 P.S. § 2650**. No group or individual should be unfairly restricted from fulfilling their role as watchers.

**Standardize Observation Rules Across Testing Types:** Ensure uniformity in observation rules across all forms of election testing, so that all watchers have consistent opportunities to observe and document the process.

**Revisit Restrictions on Phones, Binoculars, and Personal Belongings:** Allow watchers to use necessary tools to aid in observation and documentation, while maintaining reasonable safeguards for security under **25 P.S. § 2642(f)**.

**Provide Clear Public Notice of Rules and Deadlines:** Ensure all rules, deadlines, and observer procedures are made publicly available on the Delaware County government website, as required by **25 P.S. § 3514(d)**, to guarantee fair and open participation.

We look forward to your prompt resolution of these issues and trust that you will take the necessary actions to protect public confidence in the integrity of Delaware County's election process.

Sincerely,

**John Proctor Child**  
**Euphrosyne (Joy) Schwartz**  
**Paul Rumley**  
**Kathryn Buckley**  
**Dr. Alfeia DeVaughn-Goodwin, PhD**

Signed by:  
*Alfeia DeVaughn-Goodwin, PhD*  
3C64191E32054E8...  
10/10/2024

DocuSigned by:  
*Kathryn Buckley*  
4C6E7A7F11E0450...  
10/10/2024

Signed by:  
*[Signature]*  
43521FB575474DE...  
10/9/2024

Signed by:  
*Paul Rumley*  
6F438BFED354414...  
10/10/2024

DocuSigned by:  
*John Child*  
FCB76ACA2483420...  
10/9/2024

**CC:**

- Delaware Valley Journal
- Broad and Liberty
- John I. Kane, State Senator for the 9th Senatorial District of Pennsylvania
- Amanda Cappelletti, State Senator for the 17th Senatorial District of Pennsylvania
- Timothy Kearney, State Senator for the 26th Senatorial District of Pennsylvania
- Craig Williams, State Representative for the 160th Legislative District of Pennsylvania
- Mike Zabel, State Representative for the 163rd Legislative District of Pennsylvania
- Lisa Borowski, State Representative for the 168th Legislative District of Pennsylvania
- Jennifer O'Mara, State Representative for the 165th Legislative District of Pennsylvania
- Michelle Henry, Attorney General of Pennsylvania



Al Schmidt, Secretary of the Commonwealth of Pennsylvania  
Jack Stollsteimer, Delaware County District Attorney

# EXHIBIT

“E”

## Election Day Observed MIB Processing Total

$2,763 + 34,518 + 18,653 + 11,216 = 67,150$  ballots\*

\* This total used the larger of two numbers if two individuals were observing at the same time and their estimates varied. This total also assumed that all of the trays were at maximum capacity even though visual observation indicated the longer dark green trays were on average 86% full and the shorter light green trays were on average 66% full.

**Total MIBs registered** by the machines as of end of day 11.5.24: **87,248 MIBs**  
**Total max observed estimated MIBs** sorted at the tabulation center: **67,150 MIBs**  
**Delco's official MIB count is over 29% more than the observed estimated count.**

Additionally, it is important to remember that the 67,150 MIB total does not account for the observed fractional totals of many of the trays, which would bring the number down to **less than 57,000 MIBs, making the registered MIBs 55% more than the observed estimated count.**

### Data: November 5, 2024

#### Laura Lewis (using video footage) 7:00 AM

##### Aqua Trays

Rack#9            3,3,3            9

Total: 9 trays x 307 ballots/tray = 2,763

Original Unsorted Ballots: **2,763 MIBs**

#### Erik Kocher 7:00 AM

##### Dark Green Trays

Rack#1            8,8,10            26  
Rack#2            4,8,11            25  
Rack#3            3,3,1              7  
Rack#4            3,1,1              5  
Rack#5            4,2,1              7

Total: 70 trays x 307 ballots/tray = 21,490 ballots

**Light Green Trays**

Rack#1	9,6	15
Rack#2	19,11,8	38
Rack#3	6,3,13	22
Rack#4	4,10,6	20
Rack#5	5,2,2	9

Total: 104 trays x 118 ballots/tray = 12,272 ballots

Original Ballot Racks Contain: **33,762 MIBs**

**Kathleen McGuigan 7:00 AM**

**Dark Green Trays**

Racks #1 through #5	10,7,6,11,7,4,7,2,2,2,1	59
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(Noted there were additional trays not fully visible)

Total: 59 trays x 307 ballots/tray = 18,113

**Light Green Trays**

Racks #1 through #5	5,7,3,9,14,1,2,5,10,10,3,2	71
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(Noted there were at least 2 more not fully visible)

Total: 73 trays x 118 ballots/tray = 8,614

Original Ballots Racks Contain: **26,727 MIBs**

**Laura Lewis (using video footage) 7:30 AM**

**Dark Green Trays**

Rack#1	14,9,8	31
Rack#2	10,5,4	19
Rack#3	2,5,2	9
Rack#4	1,3,2	6
Rack#5	2,2,5	9

Total: 74 trays x 307 ballots/tray = 22,718

**Light Green Trays**

Rack#1	2,2,6	10
Rack#2	4,8,19	31
Rack#3	20,0,5	25
Rack#4	7,8,4	19
Rack#5	5,8,2	15

Total: 100 trays x 118 ballots/tray = 11,800

Original Ballots Racks Contain: **34,518 MIBs**

**Laura Lewis 9:30 AM**

**Aqua Trays**

Rack#9        3,3,3        9

Total: 9 trays x 307 ballots/tray = 2,763

Original Unsorted Ballots: **2,763 MIBs**

**Laura Lewis 10:10 AM**

**Dark Green Trays**

Rack#6        13,16        29

Rack#7        2,14        16

Total: 45 trays x 307 ballots/tray = 13,815

**Light Green Trays**

Rack#6        6,4        10

Rack#7        29,2        31

Total: 41 trays x 118 ballots/tray = 4,838

First Additional Ballots: **18,653 MIBs**

**Laura Lewis (using video footage) 10:10 AM**

**Dark Green Trays**

Rack#6        6,8,9        23

Rack#7        5,5,5        15

(Rack #6 lower trays were not fully visible)

Total: 38 trays x 307 ballots/tray = 11,666

**Light Green Trays**

Rack#6        4,3,1        8

Rack#7        8,5,5        18

(Rack #6 lower trays were not fully visible)

Total: 26 trays x 118 ballots/tray = 3,068

First Additional Ballots: **14,734 MIBs**

**Carris Kocher 10:45 AM**

**Dark Green Trays**

Half full tray 198 ballots  
Full tray 307 ballots  
Average tray appears to be 3/4 full

**Light Green Trays**

Half full trays 101, 91, 74, 45 ballots  
Full tray 118 ballots  
Average tray appears to be 2/3 full

**Laura Lewis 11:00 AM**

**Dark Green Trays**

Full tray 209 ballots  
Average tray appears to be  $(11*.5+6*.75+34)/51 = 86\%$  full

**Light Green Trays**

Average tray appears to be  $(25*.25+14*.5+7*.75+18)/64 = 57\%$  full

**Laura Lewis 12:10 PM**

**Dark Green Trays**

Rack #8      7,5,1      13 trays x 307 ballots/tray = 3,991

**Light Green Trays**

Rack #8      1,3,9      13 x 118 ballots/tray = 1,534  
Second Additional Ballots: 5,525

**Laura Lewis (using video footage) Remaining Racks**

**Dark Green Trays**

Rack#8      7,6,2      15  
Rack#9      6,5,5      15

Total: 30 trays x 307 ballots/tray = 9,210

**Light Green Trays**

Rack#8	2,8,10	16
Rack#9	0,1,0	1

Total: 17 trays x 118 ballots/tray = 2,006

Remaining Additional Ballots: **11,216 MIBs**

**Laura Lewis 2:05 PM**

**Aqua Trays**

Began Processing on Sorter 9 trays x 307 ballots/tray = 2,763

Processed Unsorted Ballots: **2,763 MIBs**

**David Clark 5:20 PM**

**Aqua Trays**

10 Empty

Video footage revealed these were the result of the 9 trays first sorted earlier

Election Day Arrival Ballots: **3,070 MIBs**

**Laura Lewis (evening/video footage)**

**Aqua Trays**

7 trays

Video footage revealed these were the result of the 9 trays first sorted earlier

I did not see any MIBs delivered or processed on 11.5.2024

Additional Unsorted Ballots: **2,149 MIBs**

**Affidavit of Laura Alane Lewis**

I, Laura Alane Lewis, residing at 308 Rockingham Road, Bryn Mawr, PA 19010, do hereby affirm under penalty of perjury that the information contained in this affidavit is true to the best of my knowledge and belief.

1. I am providing this affidavit solely to affirm the accuracy of my own observations as recorded in the document titled *Exhibit E - Estimated MIB Tabulation*, dated November 5, 2024.
2. My observations, which are explicitly identified within the document, were conducted on Election Day and reflect my personal estimations and recordings of the mail-in ballots (MIB) processed at that time.
3. To the best of my knowledge, these observations are accurate as documented, including any estimations related to tray capacities or specific ballot counts. All figures I provided were based on my direct visual assessments or video footage, and I made efforts to document these observations consistently and objectively.
4. I am not affirming any figures or observations within the document that were not personally made or verified by me, nor am I taking responsibility for observations recorded by other individuals.

I affirm under the laws of the Commonwealth of Pennsylvania that the foregoing is true and correct.

**Signature:**



Laura Alane Lewis

Date: November 19, 2024

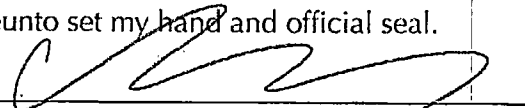
**Notary Acknowledgment**

Commonwealth of Pennsylvania  
County of Philadelphia

On this, the 19 day of November, before me, the undersigned notary, personally appeared Laura Alane Lewis, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

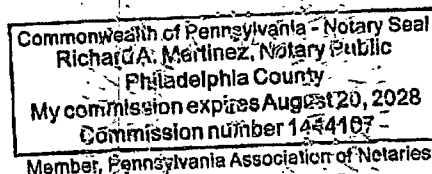
In witness whereof, I hereunto set my hand and official seal.

**Notary Public Signature:**



**Notary Seal:**

My commission expires: 08/20/28





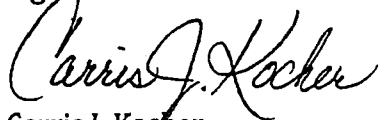
**Affidavit of Carris J. Kocher**

I, Carris J. Kocher, residing at 836 Concord Road, Glen Mills, PA 19342, do hereby affirm under penalty of perjury that the information contained in this affidavit is true to the best of my knowledge and belief.

1. I am providing this affidavit solely to affirm the accuracy of my own observations on November 5, 2024 as recorded in the document titled *Exhibit E - Estimated MIB Tabulation*.
2. My observations, which are explicitly identified within the document, were conducted on Election Day and reflect my personal estimations and recordings of the mail-in ballots (MIB) processed at that time.
3. To the best of my knowledge, these observations are accurate as documented, including any estimations related to tray capacities or specific ballot counts. All figures I provided were based on my direct visual assessments, and I made efforts to document these observations accurately, consistently and objectively.
4. After counting trays with ballots, I carefully watched and counted the number of ballots per tray being processed in the first slicing machine. I counted multiple trays of both sizes, the long trays and the short trays, making sure to include one of each that was packed full.
5. I am not affirming any figures or observations within the document that were not personally made or verified by me, nor am I taking responsibility for observations recorded by other individuals.

I affirm under the laws of the Commonwealth of Pennsylvania that the foregoing is true and correct.

**Signature:**



Carris J. Kocher

Date: November 19, 2024

**Printed Name:**

Carris J. Kocher

**Notary Acknowledgment**

Commonwealth of Pennsylvania  
County of ~~Delaware~~ CHESTER

On this, the 19<sup>th</sup> day of November 2024, before me, the undersigned notary, personally appeared Carris J. Kocher, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that she executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.

**Notary Public Signature:**



Sworn to and subscribed before me

this 19<sup>th</sup> day of NOV, 2024

**Notary Seal:**

My commission expires: NOV 16 2025

Commonwealth of Pennsylvania - Notary Seal
Joseph Johnson, Notary Public
Chester County
My commission expires November 16, 2025
Commission number 1219801

**Affidavit of J. Erik Kocher**

I, J. Erik Kocher, residing at 836 Concord Road, Apt 2, Glen Mills, PA 19342, do hereby affirm under penalty of perjury that the information contained in this affidavit is true to the best of my knowledge and belief.

1. I am providing this affidavit solely to affirm the accuracy of my own observations on November 5, 2024, recorded in the document titled *Exhibit E - Estimated MIB Tabulation*.
2. My observations, which are explicitly identified within the document, were conducted on Election Day and reflect my personal estimations and recordings of the mail-in ballots (MIB) processed at that time.
3. To the best of my knowledge, these observations are accurate as documented, including any estimations related to tray capacities or specific ballot counts. Trays were stacked and hidden behind other trays so the number of trays were estimates only. Also, the trays were not all filled with envelopes. All figures I provided were based on my direct visual assessments and I made efforts to document these observations consistently and objectively.
4. These observations were made under restrictions imposed by the Director of Elections, James Allen. Observers were restricted to certain observation areas only, were not allowed to have cell phones, cameras or binoculars to help in observing.
5. I am not affirming any figures or observations within the document that were not personally made or verified by me, nor am I taking responsibility for observations recorded by other individuals.

I affirm under the laws of the Commonwealth of Pennsylvania that the foregoing is true and correct.

**Signature:**

(Jon) *J Erik Kocher*  
 J. Erik Kocher  
 Date: November 19, 2024

*J. Erik Kocher*

**Notary Acknowledgment**

Commonwealth of Pennsylvania  
County of ~~Delaware~~ *CHESTER*

On this, the 19<sup>th</sup> day of November, 2024, before me, the undersigned notary, personally appeared Jon Erik Kocher, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.

(Stamp) 

Commonwealth of Pennsylvania - Notary Seal
Joseph Johnson, Notary Public
Chester County
My commission expires November 16, 2025
Commission number 1219801
Member, Pennsylvania Association of Notaries

*Joseph Johnson*  
Signature

Sworn to and subscribed before me  
this 19<sup>th</sup> day of NOV, 2024


**Affidavit of Kathleen Anne McGuigan**

I, Kathleen Anne McGuigan, residing at 41 Schuyler Road, Springfield, PA 19064, do hereby affirm under penalty of perjury that the information contained in this affidavit is true to the best of my knowledge and belief.

1. I am providing this affidavit solely to affirm the accuracy of my own observations as recorded in the document titled *Exhibit E - Estimated MIB Tabulation*, dated November 5, 2024.
2. My observations, which are explicitly identified within the document, were conducted on Election Day and reflect my personal estimations and recordings of the mail-in ballots (MIB) processed at that time.
3. To the best of my knowledge, these observations are accurate as documented, including any estimations related to tray capacities or specific ballot counts. All figures I provided were based on my direct visual assessments or video footage, and I made efforts to document these observations consistently and objectively.
4. I am not affirming any figures or observations within the document that were not personally made or verified by me, nor am I taking responsibility for observations recorded by other individuals.

I affirm under the laws of the Commonwealth of Pennsylvania that the foregoing is true and correct.

**Signature:**



Kathleen Anne McGuigan

Date: November 19, 2024

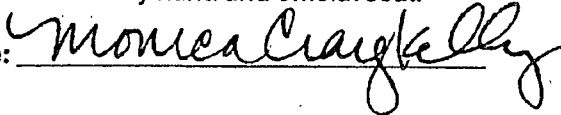
**Notary Acknowledgment**

Commonwealth of Pennsylvania

County of Delaware

On this, the 19<sup>th</sup> day of November, before me, the undersigned notary, personally appeared Kathleen Anne McGuigan, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.

**Notary Public Signature:** 

**Notary Seal:**

My commission expires: 04/01/2026

