



Audit The Vote PA

Report – County Based Recommendations for Election Integrity

August 4th , 2022

To All Pennsylvania County Commissioners:

The following report is based on our investigative research and [canvassing endeavors](#) that we performed following the 2020 election. We are making these recommendations to ensure that our election process is free, fair, and transparent so that every legal vote counts and every illegal vote does not disenfranchise the citizens of the Commonwealth who cast their ballot according to the law.

As County Commissioners, you have [full authority to administer and run your county's election](#) and can make any necessary process or procedure changes you deem necessary, as long as those changes are not in violation of the PA election code, such as skipping the reconciliation process. Pennsylvania election code establishes that precincts and then counties [must first reconcile the votes cast to voters](#) before proceeding to certify their election. While this process was not followed by certain counties in the past, such as in the 2020 election where over 100,000 votes remain unreconciled, please know that Audit The Vote PA plans to challenge counties that move forward with certifying numbers they are unable to reconcile.

Feel free to reach out to us with any questions or comments. We look forward to collaborating with you to help implement the necessary changes.

Regards,

Toni Shuppe

CEO

Audit The Vote PA

www.AuditTheVotePA.com

Ban Ballot Drop Boxes

- True The Vote has uncovered substantial evidence with the [widely used geo-spatial tracking technology](#), combined with surveillance video from the drop boxes themselves, showing that ballot harvesting is occurring and perpetrators are using the drop boxes to submit their harvested ballots. True The Vote showed evidence that this method was abused and the outcome of the 2020 election in Pennsylvania should be called into question, because the illegally submitted ballots in Philadelphia alone span nearly three times Biden's margin of victory.
- Lancaster County chose not to use drop boxes in the May 17th primary [despite being sued by the ACLU](#). We recommend that all counties follow Lancaster's lead in banning ballot drop boxes.
 - [Commissioner Parsons put out a statement that can be used as a template for this initiative](#).

Machine Issues

ATVPA is making a recommendation to not use the electronic voting tabulators or machines for the upcoming November general election. It is well within your scope of authority to make this decision as a County Commissioner.

We will be providing separate guidance on a process to hand count paper ballots at the precinct level. [The recent CISA report details serious vulnerabilities in electronic voting machines](#), specifically Dominion. The simplest way to ensure a free and fair election is with no internet capable equipment, and with a hand count, which prevents hacking and foreign interference.

- For counties not willing to take this step, we recommend the following:
 - Ensure the machines do not have internet connectivity by inspecting the internal infrastructure to make sure there is no modem present or any other device that would allow remote access to the tabulators and machines.
 - Allow concerned citizens with credentials in the tech sector to inspect the machines internet capabilities without accessing any internal or sensitive components.
 - If the machine manufacturer will not allow any such inspections, then we must consider the machines are vulnerable and cease using them.

Handling of Mail-in Ballots

- Mail-in ballots need to go back to the precincts for counting to ensure that as every Judge of Elections signs off on the tally sheets, they are accurately representing an election that they witnessed.
 - As it stands now, the Judge of Elections signs off on a tally that is then updated to reflect the mail-in ballot count AFTER election day. The given Judge is not able to oversee the counting of those ballots which belong in his/her given precinct.

- This is an area of vulnerability and needs addressed before the November election to ensure transparency and accountability.
- Ensure that all “F” type voters (FWAB, FVAP, UOCAVA, etc.) are also simultaneously registered, [as required by PA law](#).
- Mail-in ballots should have to be requested for each election, not automatically sent out.
 - The automated process trades a minor convenience for a potential vector for abuse. Those seeking to harvest ballots in their neighborhood, will seek out those ballots being sent to the addresses of deceased or moved voters.
- Signature verification must occur on all mail-in ballots. Requiring a signature will help to ensure that the registrant is the one requesting their ballot, not some random person online. Reference Section 1302 of the PA Election Code for the statutory requirements on this matter.
 - Without signature verification, every legal voter is disenfranchised by a potential illegal ballot that cannot be proven to have come from a legitimate registered voter.
- Counties should publish a report after each election to include a summary of how many ballots were sent in with valid signatures, invalid signatures, no signatures, and scribble signatures.
- Research mail-in ballot destination addresses to ensure the following:
 - Nobody is stock piling ballots. The 2000 Mules that True the Vote has revealed, show that there are NGO-connected ballot stash houses where ballots are being amassed.
 - Additionally, it was uncovered in the 2022 primary that there was [a scheme being orchestrated in Philadelphia to harvest ballots](#) by getting residents to unknowingly request their mail ballot arrive at a South Philly Ward Leader’s PO Box.
 - The canvassing effort in Allegheny County, specifically Monroeville area, resulted in one resident signing an affidavit indicating that he did not vote in the 2020 election, but according to the SURE system, there was a mail-in ballot cast under his name. This also happened in a long-term care facility in Lancaster County where we surveyed a resident who said she had not voted in at least three years, but there was also a mail-in ballot cast under her name.
 - Ballots must be sent to legal locations so that they cannot be harvested by others.
- More oversight regarding Nursing Home mail-in ballot requests to minimize ballot harvesting.
- Track the mail-in ballot arrival date separate from the scanned date.
 - It is imperative to track the arrival date so that concerned citizens can determine and account for how many mail ballots can be considered to be counted in accordance with the law.

- Some counties are already tracking these fields correctly, however some counties are entering in a date other than the ballots' arrival date, causing computational discrepancies when analyzing expected legal mail ballots.

Process Recommendations

- All ballots must be reconciled prior to the certification of the vote.
 - This is required by law in the PA Election codes, [25 Pa. Stat. § 3031.13](#).
 - There were well over 100,000 unreconciled votes statewide in the 2020 election that were certified, a direct violation of the above law.
 - Any future violations of this law will result in lawsuits.

Voter Roll Maintenance

- Utilize the NCOA (National Change of Address) service, as mandated by the law.
 - [Title 25 § 1901\(b\)\(1\)\(i\)](#) requires counties to use the NCOA database once a year at minimum.
 - Counties should be running their voter rolls against the NCOA database prior to every election and making an effort to reconcile any moves.
 - Programs like ERIC, while helpful, do not remove the requirement for counties to be leveraging the NCOA database at least once a year.
- Implement follow up canvassing to ensure accuracy/cleaning of voter rolls upon an alert of a move.
 - [Title 25 § 1901\(b\)\(2\)](#) grants counties the ability to implement a canvassing program to investigate potential voter moves, and upon confirming, allows the county to immediately cancel the registration.
 - Not performing this canvassing exercise means that in many cases, the registration is left as “inactive” and it takes two+ federal election cycles for it to be removed.
- Ensure that addresses being entered into the system are valid and legal residential addresses.
 - Bad or illegal addresses should be corrected in the system, and efforts should be made to verify upon entry to ensure data integrity.
- Run checks for duplicates against statewide voter rolls to identify and clean up duplicate registrations.
- Reconcile missing information such as DOB or gender.

Automatic Recounts

A risk limiting audit (RLA) does not yield confidence in our electoral process. After the 2020 election, the Department of State stated that of their RLA that, “The results of the sample mirrored the reported presidential election results across the participating counties **within a fraction of a percentage point**, providing confirmation of the accuracy of the vote count.

- The Department of State is openly admitting that their audit results **did not mirror** the certified results but seem to think it is a **fraction of a percentage point** (such as 0.999999 or 0.1) and therefore it is acceptable.
 - Source: <https://www.media.pa.gov/pages/State-details.aspx?newsid=453>
- The inventor of the RLA states that a RLA does not prove the accuracy of the count.
 - “At best, this pilot provided evidence that [President Joe] Biden got more votes than [Donald] Trump in total in the counties that participated in the pilot,” said **Philip Stark, a professor at the University of California at Berkeley who invented risk-limiting audits. “That’s different from showing that any equipment worked properly, that the count was accurate, or that Biden won [Pennsylvania].”**
 - Source: <https://whyy.org/articles/pa-audit-confirms-biden-got-more-votes-than-trump-but-cant-tell-us-much-else/>
- Perform a hand recount of 3+ precincts each election cycle, either chosen at random or in coordination with citizen petitions.
- Allow petitioners access to hand recounts as outlined by [25 Pa § 3261](#) “Cause the entire vote of the election district to be correctly counted **by persons** designated by the court.”