

DECLARATION OF RICHARD HAYES PHILLIPS

I, Richard Hayes Phillips, declare the following:

1. I have personal knowledge of the facts alleged herein.
2. I reside at [redacted], Canton, New York. I hold a Ph.D. in geomorphology from the University of Oregon. Both my graduate and post-graduate work in groundwater hydrology required that I examine reams of statistical evidence in order to spot anomalous data. I have been recognized as an expert witness in Federal District Court in Albuquerque, New Mexico, and at Resource Conservation and Recovery Act (RCRA) hearings in Santa Fe, New Mexico.
3. I also have a long-standing interest in history and politics. I hold a B.A. in politics and geography from the State University of New York at Potsdam, and M.A. degrees in history and geography from the University of Oklahoma. I have worked in five presidential campaigns, including three New Hampshire primaries. I taught American history at three colleges and universities in New Mexico for three years. I have published four books on American history, some of which are standard references in libraries and archives both here and overseas.
4. After the 2004 presidential election, I examined precinct canvass results for the State of Ohio, utilizing the same analytical techniques which have enabled me, in the past, to detect unusually rapid groundwater flow or groundwater contamination. In December 2004 I was retained as an expert witness in the Moss v. Bush lawsuit, for which I submitted 21 research papers to the Ohio Supreme Court, was deposed for 4 hours, and was not even questioned by opposing counsel. In September 2006, in the King Lincoln v. Blackwell lawsuit, I filed in Federal District Court an 18-page Declaration which was instrumental in protecting from destruction the ballots from the 2004 presidential election in Ohio.
5. I subsequently authored and published a book entitled "Witness to a Crime: A Citizens' Audit of an American Election" (Canterbury Press, Rome, New York, 2008), based upon photographs of 126,000 ballots, 127 poll books, 141 voter signature books, ballot accounting charts, and other election records from precincts of my choosing in 18 of 88 counties in Ohio, all of which I analyzed myself.
6. In May 2016 I was retained as an expert witness for the purpose of analyzing and comparing official precinct canvass results for the 2008 and 2016 Democratic presidential primaries in as many states as possible in the limited time available. Precinct results are readily available in some but not all jurisdictions.
7. It quickly became apparent, when comparing the 2016 results to the 2008 results, that Hillary Clinton, against Bernie Sanders, had made tremendous gains among voters in predominantly black wards and precincts that she had lost overwhelmingly

in 2008 to Barack Obama. In any state where this happened, Clinton would be awarded many more delegates than she otherwise would have gotten. In some states, the official results from these communities accounted for her statewide margins of victory. The questions to be answered are whether or not these gains are entirely legitimate, and where the ballots can be examined in order to find out.

8. The final exit polls, adjusted to match the official results, have proved useful in the states where they are available. Simply stated, these numbers display the demographic breakdown of the electorate by which the exit pollsters explain the official results. CNN exit polls are available in 25 of the first 29 states that held Democratic presidential primaries (the exceptions being Arizona, Delaware, Louisiana, and Rhode Island). In each of these 25 states, the exit polls report the racial breakdown of the Democratic electorate, to the nearest percent. In 15 of these 25 states (the exceptions being Indiana, Maryland, Michigan, Mississippi, New Hampshire, North Carolina, Ohio, Vermont, Virginia, and West Virginia), comparable data are available from CNN exit polls conducted and published in 2008. In 12 of these 15 states, according to the CNN exit polls, black voters comprised a larger percentage of the Democratic electorate in 2016 than in 2008. The 12 states were Alabama (54% / 51%), Arkansas (27% / 16%), Connecticut (15% / 9%), Florida (27% / 20%), Illinois (28% / 24%), Missouri (21% / 18%), New York (22% / 16%), Oklahoma (14% / 7%), Pennsylvania (19% / 15%), South Carolina (61% / 54%), Tennessee (32% / 29%), and Wisconsin (10% / 8%). The three exceptions were Georgia (51% / 51%), Massachusetts (4% / 6%), and Texas (19% / 19%).
9. In 21 of the 25 states for which the adjusted exit poll data are available, the exit polls report the presidential preferences of the black portion of the Democratic electorate, to the nearest percent (the exceptions being Massachusetts, New Hampshire, Vermont, and West Virginia, where blacks comprised less than 5% of the Democratic electorate, and the data base may have been considered insufficient for this purpose). In 10 of these 21 states, all in the South, the exit polls reported that Hillary Clinton received 80% to 91% of the black vote, and that Bernie Sanders received 6% to 19% of the black vote. In the other 11 of these states, all outside the South, the exit polls reported that Hillary Clinton received between 67% and 75% of the black vote, and that Bernie Sanders received between 22% and 32% of the black vote.
10. When these two data sets are considered together, simple multiplication reveals that, according to the exit polls, adjusted to match the official results, black voters for Clinton comprised a huge proportion of the Democratic electorate in some states (49% in Alabama, 43% in Georgia, 63% in Mississippi, 52% in South Carolina), and a substantial proportion in others (25% in Arkansas, 22% in Florida, 26% in North Carolina, 28% in Tennessee, 15% in Texas, 22% in Virginia). The highest such numbers outside the South were in Illinois and

New York, where black voters for Clinton comprised 20% and 17% of the Democratic electorate, respectively.

11. The South Carolina primary was held on February 27, 2016. The Alabama, Arkansas, Georgia, Tennessee, Texas, and Virginia primaries were held on March 1, 2016 (as were the primaries in Massachusetts, Oklahoma, and Vermont, and the caucuses in Colorado and Minnesota). The Louisiana primary was held on March 5, 2016, and the Mississippi primary was held on March 8, 2016. In these nine southern states, Clinton won 499 pledged delegates to 212 for Sanders, a lead that has proven insurmountable.
12. The question arises as to whether Bernie Sanders really did receive less than half the support among black voters in the South as he did elsewhere in the country, or whether these or any other vote counts were altered.
13. It is my expert opinion that the raw data for the unadjusted exit polls should be made available to the public, together with a presentation of the mathematical adjustments made to these data. It is a fact, proven by screen shots from the CNN website, that significant adjustments were made in the 2016 exit polls to the racial breakdown of the Democratic electorate, and, more importantly, to the percentages awarded to the presidential candidates among the various racial groups. (We lack the unadjusted CNN exit poll data for South Carolina).
14. The percentage of the Democratic electorate comprised of black voters was adjusted upward in Alabama (from 47% to 54%), Georgia (from 49% to 51%), Illinois (from 27% to 28%), Indiana (from 17% to 19%), Mississippi (from 68% to 71%), Missouri (from 19% to 21%), North Carolina (from 29% to 32%), Pennsylvania (from 17% to 19%), Texas (from 16% to 19%), and Virginia (from 24% to 26%). In Michigan, the percentage was adjusted downward (from 23% to 21%). (There are no data for black voters in the unadjusted exit poll for Wisconsin).
15. The percentage of black voters won by Clinton over Sanders was adjusted upward in Alabama (from 87%-10% to 91%-6%), Arkansas (from 88%-12% to 91%-9%), Florida (from 78%-22% to 81%-18%), Georgia (from 83%-16% to 85%-14%), Illinois (from 69%-30% to 70%-30%), Michigan (from 64%-32% to 68%-28%), New York (from 71%-29% to 75%-25%), Ohio (from 67%-31% to 71%-28%), Tennessee (from 82%-12% to 89%-10%), Texas (from 80%-18% to 83%-15%), and Virginia (from 82%-18% to 84%-16%). In Oklahoma her percentage was adjusted downward (from 75%-24% to 71%-27%).
16. When these two data sets are considered together, the effect is that the percentage of the Democratic electorate comprised of black voters for Clinton was adjusted upward in 15 of 19 states (Alabama, Arkansas, Florida, Georgia, Illinois, Indiana, Mississippi, Missouri, New York, North Carolina, Ohio, Pennsylvania, Tennessee, Texas, and Virginia). The largest adjustment was in Alabama (41% to 49%). The exceptions were Maryland, Michigan, and Oklahoma, where the percentage was adjusted downward, and Connecticut, where the percentage remained the same.

17. This does seem counterintuitive. One would think that the percentage of the Democratic electorate comprised of black voters would have been higher in 2008, when Clinton's opponent was Barack Obama, than in 2016, when Clinton's opponent was Bernie Sanders. A plausible explanation would be that voter turnout decreased more sharply among white voters than among black voters.
18. To test this hypothesis, we return to the states where exit poll data for the racial breakdown of the Democratic electorate are available for 2008 and 2016 (see paragraph 8). In 13 of these 15 states, total voter turnout in the Democratic primary was down in 2016 as compared to 2008. The exceptions were Illinois (up 0.855%) and New York (up 4.93%). And yet, if one multiplies the total ballots cast in the Democratic primaries by the percentages of the Democratic electorate comprised of black voters (according to the final exit polls), turnout among black voters was up in 2016 as compared to 2008 in 7 of these 15 states: Arkansas by 19%, Connecticut by 54%, Florida by 32%, Illinois by 18%, New York by 44%, Oklahoma by 61%, and Wisconsin by 13%. It seems especially difficult to explain how turnout among black voters could have increased by 18% in Illinois, the home state of Barack Obama.
19. There are fifty wards in Chicago. In 2008, Obama won more than 90% of the vote against Clinton in thirteen of them (Wards 3, 4, 5, 6, 7, 8, 9, 17, 20, 21, 24, 28, 34). One may safely assume that these wards have predominantly black populations. According to the official results, total voter turnout in these thirteen wards was 209,436 in 2008, and 220,497 in 2016, up by 5.28%, but not by 18%. Most of the increase occurred in Ward 3 (11,546 in 2008, and 17,641 in 2016).
20. In some urban areas with majority black populations, according to the official results, Clinton got more votes in 2016 than Obama got in 2008. In Montgomery County, Alabama, where the population is 54.7% black, Obama got 25,781 votes in 2008, and Clinton got 28,755 votes in 2016. In Orleans Parish, Louisiana, where the population is 60.2% black, Obama got 34,323 votes in 2008, and Clinton got 40,650 votes in 2016. In Baltimore City, Maryland, where the population is 63.7% black, Obama got 79,760 votes in 2008, and Clinton got 87,762 votes in 2016.
21. It has been widely noted that the unadjusted CNN exit polls for the Democratic presidential primaries, in many states, are at variance with the official results. As stated above, we are in possession of screen shots of unadjusted CNN exit polls in 22 states. Thus I have been able to verify these numbers myself, without having to rely on internet postings of questionable veracity. In each of the 22 exit polls, the Democratic electorate is broken down by gender, and both genders are broken down by choice of candidate. It is an elementary mathematical procedure to calculate the combined percentages for both Clinton and Sanders.

22. When the CNN exit poll percentages for Clinton and Sanders for both genders combined are subtracted from one another, and these margins are compared with the margins between the candidates according to the official results, there are disparities in every state, some much larger than others. In 19 states, the margin favors Clinton in the official results when compared to the unadjusted CNN exit polls: Alabama (14.0%), Georgia (12.1%), New York (11.7%), Mississippi (9.4%), Texas (9.3%), Ohio (9.2%), Tennessee (8.2%), Massachusetts (8.0%), Indiana (5.8%), Michigan (4.8%), Arkansas (4.7%), Virginia (4.4%), Illinois (4.3%), Missouri (3.85%), Florida (3.4%), Pennsylvania (2.7%), Connecticut (2.2%), North Carolina (1.5%), and Vermont (1.1%). In three states, the margin favors Sanders in the official results when compared to the CNN exit poll: Oklahoma (6.2%), Wisconsin (2.0%), and Maryland (1.7%). In three states (Massachusetts, Illinois, and Missouri), the winner and loser were reversed: the unadjusted CNN exit poll showed Sanders winning the primary, but the official results showed Clinton winning the primary.
23. All exit polls have a margin of error, but that is of little concern here. The magnitudes of some of the disparities are evidence enough.
24. My use of the word "unadjusted" comes with a caveat: these are exit polls posted on the CNN website at or near to the time the polls closed, and they may already have been adjusted prior to that.
25. It is my understanding that exit polls conducted in this country, including those posted on CNN, are adjusted to match the official results. The idea is to present an accurate demographic breakdown of the electorate that produced those official results. They are not specifically designed to detect fraud. What the unadjusted exit polls should closely reflect is the vote count at the polls, on Election Day. Some states have early voting, and all states have absentee voting, and these votes are counted in the official results, but early voters and absentee voters do not vote on Election Day, and would not be available for interviews upon exiting the polls.
26. Among the 25 states for which CNN exit polls were conducted, 12 have early voting: Arkansas, Florida, Georgia, Illinois, Indiana, Maryland, North Carolina, Ohio, Tennessee, Texas, Vermont, and West Virginia. Other primary states with early voting, for which no CNN exit polls were conducted, include: Arizona, California, Kentucky, Louisiana, and New Mexico.
27. In 8 of 12 states with early voting (Arkansas, Florida, Georgia, Michigan, North Carolina, Ohio, Tennessee, Texas), the CNN "exit polls" did include telephone surveys of early voters, thus introducing a sampling bias that would not exist in a pure exit poll. Not included would be voters still out of town, or without land lines, or with unlisted numbers, or who use caller ID to screen their calls, or with no telephone at all.

28. It is my expert observation, based upon years of experience, that a disparity between the exit polls and the official results (or, more precisely, between the unadjusted exit polls and the vote count at the polls) is a red flag, a signal that further investigation is warranted, but it does not prove that fraud has occurred (unless adjustments to the exit polls cannot be justified). A disparity between the ballots and the official results does prove that fraud has occurred (unless the disparity is small enough to be attributed to error in counting the votes).
29. Generally speaking, election fraud does not occur across the board, by shifting votes from one candidate to another in every ward and precinct. Such alterations would be discovered by any random audit. Rather, alterations to the vote count vary from precinct to precinct, and are most apparent at the precinct level.
30. My usual methodology is to look at the election results, county by county, compared to another election, and find the general pattern that predominates statewide. The counties that turned out another way are the anomalous counties. Then I look at the anomalous counties, town by town, or ward by ward, to find where this anomalous pattern turned up. These are the highly anomalous towns or wards that caused the entire county to be anomalous. Then I look at the precincts within these highly anomalous towns or wards. The most extreme examples are the precincts to be audited. If the ballots match the official count here, in a targeted audit, in suspect precincts specifically chosen for a fraud investigation, it is more convincing than a random audit. But if the ballots do not match the official count, it is prima facie evidence of fraud or egregious error.
31. At the national level, the most obvious pattern is the low voter turnout. Only in Illinois, Maryland, Michigan, New Mexico, and New York was turnout in the Democratic primary higher in 2016 than in 2008 (in Oregon, turnout was down only slightly, by 0.1%, from 641,499 to 640,854). In Michigan, this is partly because the state was penalized in 2008 for violating party rules by holding its primary too soon, thus forfeiting half its delegates, which, coupled with the fact that Barack Obama and John Edwards were not on the ballot, probably depressed voter turnout. In some states (Indiana, Mississippi, Ohio, South Dakota, and Texas), voter turnout in 2016 was about half what it had been in 2008.
32. At the state level, when Clinton's vote count in 2016 is divided by her vote count in 2008, the highest quotients are 1.93 in South Carolina, 1.82 in Maryland, 1.64 in Georgia, and 1.62 in Louisiana. That is to say, her vote count increased by more than half, or nearly doubled. These are very impressive numbers, especially in the face of lower voter turnout in three of those states.
33. Of these four states, three (Georgia, Louisiana, and South Carolina) have paper ballots marked by voters only for absentee ballots. Voting at the polls, and early voting (in Georgia and Louisiana) is conducted statewide, in every county, on electronic voting machines with no "voter verified paper trail." There are no ballots to audit. Nor is there a questionable "paper trail" to audit. There is no

way to verify the vote count for the candidates, except for the absentee ballots, and even that cannot be done unless election officials make public a separate official count, at the precinct level, for absentee ballots. All that can be verified for voting at the polls, or for early voting, is the voter turnout, that is, the total ballots cast, which is done by comparing the official number of ballots cast in a given precinct with the number of voter signatures in the poll book. That is all. There is no way to verify that the votes were counted as cast.

34. In Louisiana, statewide, Clinton lost to Obama in 2008 by 83,707 votes, 220,632 (57.40%) to 136,925 (35.63%), and Clinton defeated Sanders in 2016 by 149,457 votes, 221,733 (71.12%) to 72,276 (23.18%), a net gain of 233,164 votes. In Louisiana, the precincts are so small that it is better to begin by examining the election results by parish. The candidates' vote totals are available at the parish level for early voting, and at both the parish and precinct levels for the overall vote count, but there is no separate breakdown for absentee ballots. There is also a table, at the parish level, entitled "Statewide Early Voting Statistical Report," giving the total count of early voters (including absentee ballots), broken down by party affiliation. There are 64 parishes in Louisiana. In 32 of 64 parishes, exactly half, the total votes counted for early voting in the official results for the Democratic primary is greater than the total number of Democratic voters, early plus absentee, in the "Statistical Report." That is to say, there were more votes than voters. These include some of the largest parishes in Louisiana, for which the numbers are given here, listing the official vote count first, and the number from the "Statistical Report" secondly: Calcasieu 1848 / 1688, East Baton Rouge 6370 / 6034, Rapides 1368 / 1204, St. Tammany 2110 / 1897. Statewide, in the Democratic presidential primary, there were 53,019 early plus absentee voters according to the "Statistical Report," and 53,589 early votes counted in the official results, which, although incorrect, illustrates perfectly how erroneous or fraudulent numbers at the parish level can be masked at the state level. In the 32 parishes with impossible numbers, there were 19,629 early plus absentee voters according to the "Statistical Report," and 21,721 early votes counted in the official results. There are 315 precincts in East Baton Rouge Parish. Sanders got less than 10% of the vote in 68 of them.
35. In South Carolina, statewide, Clinton lost to Obama in 2008 by 153,908 votes, 294,898 (55.42%) to 140,990 (26.49%), and Clinton defeated Sanders in 2016 by 175,881 votes, 272,379 (73.44%) to 96,498 (26.02%), a net gain of 329,789 votes. An NBC exit poll, still posted online at midnight, had Clinton winning South Carolina by 68.4% to 31.2%, a disparity of 10.2% when compared to the official results. The CNN exit poll, adjusted to match the official results, has the black vote at 86% for Clinton, 14% for Sanders, with black voters comprising 61% of the Democratic electorate. I have been able to obtain the precinct results only for Charleston County, where blacks comprise 29.8% of the population. In Charleston County, Clinton lost to Obama in 2008 by 18,786 votes, 30,073 (62.59%) to 11,287 (23.49%), and Clinton defeated Sanders in 2016 by 13,118

votes, 26,625 (65.97%) to 13,507 (33.47%), a net gain of 31,904 votes. There are 182 precincts in Charleston County. Sanders got less than 20% of the vote in 27 of 182 precincts, ranging as low as 11.92%, 11.46%, 11.11%, and 10.72%, never dropping below 10%. The absentee ballot count was 4,083 (79.58%) for Clinton, 1,015 (19.78%) for Sanders, from which it can be deduced, by simple subtraction, that the vote count at the polls was Clinton 22,542 (63.99%), Sanders 12,492 (35.46%). This is a smaller margin, by 4.0%, than in the overall vote count, but even if a similar differential prevailed statewide, it would not explain the exit poll disparity of 10.2%. Nor can the disparity be explained by early voting, which is not allowed in South Carolina. The absentee ballots should be audited, being paper ballots marked by voters and run through optical scanners. No other vote counts can be verified, as all other voting everywhere in South Carolina is on electronic voting machines with no "voter verified paper trail."

36. In Georgia, statewide, Clinton lost to Obama in 2008 by 374,221 votes, 704,247 (66.39%) to 330,026 (31.11%), and Clinton defeated Sanders in 2016 by 329,877 votes, 545,674 (71.30%) to 215,797 (28.20%), a net gain of 704,098 votes. Georgia is one of only three states for which I have obtained statewide data broken down by type of voting. This enables me to answer the question of whether the disparity between the CNN exit poll and the official results is explained by the Clinton campaign's prowess at getting her supporters to vote early, in which case they would not be among the pool of voters available for exit polling on Election Day. In Georgia, statewide, according to the official results, Clinton won with voters at the polls by 69.57% to 29.93%, among early voters by 78.37% to 21.16%, and with absentee voters by 72.19% to 26.43%. This does not explain the disparity. The unadjusted CNN exit poll had Clinton winning Georgia by 64.8% to 33.8%, far less than her official margin at the polls. (Early voting also would not explain the exit poll disparities in Alabama, Connecticut, Massachusetts, Michigan, Mississippi, Missouri, New York, Oklahoma, Pennsylvania, Virginia, or Wisconsin, where there is no early voting). Moreover, Georgia is one of the eight states where the CNN "exit poll" included telephone polls of early and absentee voters, which makes the disparity all the more unexplainable. The CNN exit poll for Georgia, adjusted to match the official results, has the black vote at 85% for Clinton, 14% for Sanders, statewide. I have obtained precinct results for Fulton County (Atlanta), and DeKalb County (Decatur). Clinton defeated Sanders in Fulton County by 71.00% to 28.75%, and in DeKalb County by 71.47% to 28.30%, very close to the statewide percentages. Sanders got less than 20% of the vote in 90 of 347 precincts in Fulton County (and less than 10% in eleven precincts). Sanders got less than 20% of the vote in 63 of 192 precincts in DeKalb County (and less than 10% in zero precincts). Because the absentee vote count is available only at the state level, and not at the county or precinct level, there is no way to audit the absentee ballots. And because there are no ballots with which to verify the vote count anywhere in Georgia, other than absentee ballots, the raw data from the exit polls is the only available measure of the accuracy of the official results.

37. According to the final CNN exit polls, adjusted to match the official results, Clinton got her highest percentages of the black vote in four states, defeating Sanders among black voters by 91% to 6% in Alabama, 91% to 9% in Arkansas, 89% to 11% in Mississippi, and 89% to 10% in Tennessee. In three of these states, Clinton's percentages had been adjusted upward and Sander's percentages had been adjusted downward (see paragraph 15), the exception being Mississippi, where the candidates' percentages remained the same.
38. In Mississippi, statewide, Clinton lost to Obama in 2008 by 106,281 votes, 265,502 (61.15%) to 159,221 (36.67%), and Clinton defeated Sanders by 149,586 votes, 187,334 (82.47%) to 37,748 (16.62%) in 2016, a net gain of 255,867 votes. The unadjusted CNN exit poll had Clinton winning Mississippi by 77.7% to 21.3%, a disparity of 9.4%. There are 82 counties in Mississippi. Voting at the polls, in 69 of 82 counties, is conducted on electronic voting machines with no "voter verified paper trail." (There is no early voting). There is no way to verify the vote count, except for absentee ballots. Eight counties have electronic voting machines with a "voter verified paper trail." In five counties (DeSoto, Harrison, Hinds, Lee, and Yalobusha), voting at the polls is on paper ballots marked by voters, and these counties can be audited. By far the largest is Hinds County, where Jackson is located, where Clinton defeated Sanders by 32,207 (84.06%) to 5,899 (15.40%). There are 80 precincts in Hinds County, numbered 1 to 96 (with 16 numbers unassigned). Sanders got less than 20% of the vote in 47 of 80 precincts, including 14 consecutive (18 to 31), 14 consecutive (51 to 69), and 15 consecutive (80 to 96). Sanders got less than 10% of the vote in 17 of 80 precincts, including 8 of 13 (18 to 30). These are the ones to be audited. In Harrison County, where Gulfport and Biloxi are located, Clinton defeated Sanders by 6,945 (74.21%) to 2,345 (25.06%). There are 59 precincts in Harrison County. Sanders got less than 10% of the vote in two precincts (Gulfport #16 and West North Gulfport), and less than 20% of the vote in eight others (Delisle, East Biloxi, East North Gulfport, Gulfport #3, #13, #14, Magnolia Grove, and South Bel-Aire). These precincts could be audited also.
39. Voter turnout in the Democratic presidential primary in Mississippi was down drastically. The total vote count in 2016 was 227,164, barely half, 52.32%, of the total vote count of 434,152 in 2008. The reason is that Mississippi has nonpartisan voter registration, and anyone may vote in either primary. The total vote count in the Republican presidential primary was 416,270 in 2016, almost triple, 2.863 times, the total vote count of 145,395 in 2008. The total vote count in the Republican and Democratic primaries combined was 643,434 in 2016, up substantially, by 11.02%, from the total vote count of 579,547 in 2008.
40. In Tennessee, statewide, Clinton lost to Obama in 2008 by 83,371 votes, 336,245 (53.82%) to 252,874 (40.48%), and Clinton defeated Sanders in 2016 by 125,130 votes, 245,930 (66.07%) to 120,800 (32.45%), a net gain of

208,501 votes. Precinct results statewide, listed by county, are readily available in one .pdf file. Almost all of the precincts where Sanders got less than 10% of the vote were in southwestern Tennessee -- 3 of 15 in Fayette County, 3 of 28 in Gibson County, 4 of 13 in Hardeman County, 5 of 11 in Haywood County, 5 of 33 in Madison County, and 42 of 114 in Memphis. (Sanders got less than 20% of the vote in 69 of 114 precincts in Memphis, and 13 of 52 precincts elsewhere in Shelby County). There were only seventeen precincts in all the rest of the state where Sanders got less than 10% of the vote, and eight of these had twenty or fewer voters. There are 95 counties in Tennessee. Voting at the polls, and early voting, in 91 of 95 counties, and in parts of Pickett County, is conducted on electronic voting machines with no "voter verified paper trail." There is no way to verify the vote count, except for absentee ballots. This includes all of southwestern Tennessee. In three counties (Hamilton, Hardin, and Polk), all voting is on paper ballots marked by voters, and only these counties can be audited. By far the largest is Hamilton County, where Clinton defeated Sanders by 15,604 (64.38%) to 8,418 (34.73%). There are 130 precincts in Hamilton County (67 of them in Chattanooga). Seventeen of these precincts were very small, with fewer than ten voters. Among the others, Sanders got less than 10% of the vote in 2 of 113 precincts, and less than 20% of the vote in 14 of 113 precincts, all in Chattanooga. These precincts can be audited, but this will not tell us what happened in Memphis.

41. In Arkansas, statewide, Clinton defeated Obama in 2008 by 137,660 votes, 220,136 (70.05%) to 82,476 (26.25%), and Clinton defeated Sanders in 2016 by 79,821 votes, 146,057 (66.08%) to 66,236 (29.97%), a net loss of 57,839 votes. Arkansas is the only one of eleven southern states where Clinton suffered a net loss of votes. Clinton got more than 80% of the vote in five counties, all of them small, her highest percentage being 89.60% in Lee County, where 55.3% of the population is black. Clinton got more than 70% of the vote in twenty counties, the largest being Pulaski County, where Little Rock is located. This is the only county for which I have been able to obtain precinct results. In Pulaski County, Clinton defeated Sanders by 34,906 (76.39%) to 10,485 (22.95%). There are 137 precincts in Pulaski County. Sanders got less than 10% of the vote in 8 of 137 precincts (47, 52, 53, 122, 130, 133, 134, 135), and less than 20% of the vote in 49 of 137 precincts, including 8 consecutive (79-86), 7 of 10 (98, 100, 102-105, 107), 9 of 11 (115-117, 119-120, 122-125), and 9 consecutive (127-135). Parts of Pulaski County, for voting at the polls, have paper ballots marked by voters and run through an optical scanner, and parts have electronic voting machines with a "voter verified paper trail." Absentee and provisional voting have the paper ballots. Early voting has the "voter verified paper trail." The entire county can be audited, but precincts with paper ballots marked by voters are preferable for this purpose, because there is no way of knowing if voters actually verified the "paper trail" before recording their votes, or whether the "paper trail" on record is the same one that the voters actually saw.

42. In Alabama, statewide, Clinton lost to Obama in 2008 by 77,225 votes, 300,321 (55.96%) to 223,096 (41.57%), and Clinton defeated Sanders in 2016 by 233,012 votes, 309,071 (77.88%) to 76,059 (19.17%), a net gain of 310,237 votes. There are paper ballots marked by voters everywhere in Alabama. Any county can be audited. Precinct results are readily available for Jefferson County (where Birmingham City is located), and Montgomery County (where Montgomery City is located). In Jefferson County, Clinton defeated Sanders by 67,408 (81.64%) to 14,341 (17.37%). There are 173 precincts in Jefferson County. In 58 of 173 precincts, including 54 of the first 84 on the list, Sanders got less than 10% of the vote; and in Bessemer, the absentee ballot count was 478 for Clinton, 14 for Sanders. In 92 of 173 precincts, including 70 of the first 81 on the list, Sanders got less than 20% of the vote; and in Birmingham, the absentee ballot count was 437 for Clinton, 88 for Sanders. In Montgomery County, Clinton defeated Sanders by 28,755 (86.22%) to 4,283 (12.84%). There are 121 precincts in Montgomery County. In 47 of 121 precincts, Sanders got less than 10% of the vote, including 16 consecutive (27 to 42). In 96 of 121 precincts, Sanders got less than 20% of the vote, including 34 consecutive (17 to 50). These are such high proportions of the precincts that random audits should have been sufficient to detect fraud or error in the vote count. But Alabama does not conduct post-election audits. Nor do any of the other seven states thus far discussed, except for Tennessee, where, in 91 of 95 counties, there is effectively nothing to audit.
43. In the other four southern states, according to the final CNN exit polls, adjusted to match the official results, Clinton's percentage of the black vote was a bit smaller -- 84% in Virginia, 83% in Texas, 81% in Florida, 80% in North Carolina. In three of these states, Clinton's percentages had been adjusted upward and Sanders' percentages had been adjusted downward (see paragraph 15), the exception being North Carolina, where Sanders' percentage was adjusted upward by 1%, and Clinton's percentage remained the same.
44. In Virginia, statewide, Clinton lost to Obama in 2008 by 278,054 votes, 627,820 (63.66%) to 349,766 (35.47%), and Clinton defeated Sanders in 2016 by 228,371 votes, 504,741 (64.29%) to 276,370 (35.20%), a net gain of 506,425 votes. Precinct results are available statewide. There are 95 counties in Virginia, and 38 independent cities. About half have paper ballots marked by voters, and about half have electronic voting machines with no "voter verified paper trail." Sanders got less than 20% of the vote in 17 counties and independent cities, all of them small, the largest being Petersburg City, where the count was Clinton 4,100 (85.36%), Sanders 688 (14.32%). At all polling places, Petersburg City had paper ballots marked by voters, and these can be audited. Sanders got between 20% and 30% of the vote in 28 counties and independent cities, the largest being Henrico County, where the count was Clinton 28,170 (69.76%), Sanders 11,994 (29.70%). At all polling places, Henrico County had paper ballots marked by voters, and these can be audited. There are 92 precincts in Henrico County. Sanders got less than 20% of the vote in 22 of 92 precincts, including

Spottswood, where Sanders got zero, his votes all being counted for Martin O'Malley: Clinton 129 (65.15%), O'Malley 69 (34.85%). For the record, in the other 91 precincts combined, O'Malley got 150 votes. There is something wrong with the tabulators. The official count in these 22 precincts was Clinton 11,603, Sanders 2,304. These precincts should be audited. Richmond City is an independent jurisdiction bordered by Henrico County. In Richmond City, the count was Clinton 21,828 (60.58%), Sanders 14,117 (39.18%), much closer than in Henrico County. Still, Sanders got less than 20% of the vote in 17 of 65 precincts in Richmond City, and less than 10% in two precincts. The official count in these 17 precincts was Clinton 5,926, Sanders 1,110. Richmond City has paper ballots marked by voters, citywide. These precincts can be audited. They should have been audited already. But Virginia does not conduct post-election audits.

45. In the cities of southeastern Virginia, a similar pattern prevails. Sanders got less than 20% of the vote in 11 of 63 precincts in Chesapeake, and 12 of 49 precincts in Norfolk. All polling places in these cities have electronic voting machines with no "voter verified paper trail," so the vote counts in these precincts cannot be verified. Sanders got less than 20% of the vote in 12 of 31 precincts in Hampton, in 17 of 47 precincts in Newport News (and less than 10% in three of these), in 11 of 31 precincts in Portsmouth (and less than 10% in four of these), and in 10 of 27 precincts in Suffolk (and less than 10% in two of these, including Hollywood, where the count was Clinton 290, Sanders 10. All polling places in these cities have paper ballots marked by voters, so these precincts can be audited. By contrast, in Virginia Beach, which also has paper ballots at all polling places, Sanders got less than 20% of the vote in zero of 98 precincts.
46. In Texas, statewide, Clinton lost to Obama in 2008 by 100,258 votes, 1,462,734 (50.88%) to 1,362,476 (47.39%), and Clinton defeated Sanders in 2016 by 459,457 votes, 936,004 (65.19%) to 476,547 (33.19%), a net gain of 559,715 votes. Some counties in Texas have paper ballots marked by voters, some have electronic voting machines with no "voter verified paper trail," and some have a mix of both. However, the counties including most of the major cities -- Amarillo, Austin, Corpus Christi, El Paso, Houston, Lubbock, San Antonio, Waco, Wichita Falls -- are among those with electronic voting machines with no "voter verified paper trail," where only absentee ballots can be audited. The only urban counties with a mix, where some voting at the polls is on paper ballots marked by voters, are Dallas County (Dallas), and Tarrant County (Fort Worth).
47. In Bexar County, where San Antonio is located, Clinton defeated Sanders by 76,533 (66.83%) to 36,750 (32.09%). There are 593 precincts in Bexar County with ten or more voters. Sanders got less than 20% of the vote in 58 of 593 precincts, and less than 10% of the vote in only two of them, both of them small: Precinct 1059 (Clinton 11, Sanders 1), and Precinct 1123 (Clinton 49, Sanders 5). In Harris County, where Houston is located, Clinton got 157,000 votes, exactly,

- defeating Sanders by 157,000 (70.50%) to 63,416 (28.48%). There are 1012 precincts in Harris County, identified by number, in sequence. Of these, 95 precincts had fewer than 10 voters. Among the remaining precincts, Sanders got less than 20% of the vote in 183 of 917 precincts, including 14 of 27 (144-171), 12 of 23 (186-208), 18 of 27 (227-253), and 6 of 11 (285-295), and less than 10% of the vote in 54 of these precincts. Of 227,280 votes counted in the Democratic primary, 87,605 (38.54%) were "early ballots cast," which includes both early and absentee voting. Without a separate breakdown of absentee ballots at the precinct level, there is no way to audit the absentee ballots, which are the only votes cast on paper ballots (run through an optical scanner). All other votes in Harris County are cast on electronic voting machines with no "voter verified paper trail," so the official results cannot be verified.
48. In Dallas County, Clinton defeated Sanders by 113,664 (71.45%) to 44,275 (27.83%). There are 797 precincts in Dallas County, numbered sequentially from 6001 to 6797. Of these, 107 precincts had ten or fewer voters. Among the others, Sanders got less than 20% of the vote in 148 of 690 precincts, including 58 of 59 (6395-6405, 6407-6447), and 18 of 19 (6531 to 6549). Sanders got less than 10% of the vote in 26 of 690 precincts, including 20 of 52 (6393, 6398, 6401, 6403, 6407, 6413, 6414, 6416, 6420, 6423, 6426, 6432, 6434, 6435, 6439, 6443, 6444, 6445, 6447, 6449). If these votes were cast on paper ballots, the precincts can be audited. The precinct results for Dallas County are presented in separate files for early voting, absentee ballots, voting at the polls, and precinct totals. Countywide, Clinton won with voters at the polls by 69.13% to 30.22%, among early voters by 75.26% to 23.93%, and with absentee voters by 78.90% to 19.58%. The margins, according to the official results, were 43.62% for the precinct totals, and 38.91% for voters at the polls. Even if this differential is similar statewide, it would not explain the exit poll disparity of 9.3%. In Dallas County, absentee ballots can be analyzed at the precinct level. Clinton got 20 or more absentee votes (referred to as "early voting by mail") in 26 precincts (6016, 6112, 6113, 6177, 6179, 6258, 6280, 6376, 6384, 6392, 6396, 6422, 6587, 6588, 6591, 6596, 6603, 6624, 6625, 6644, 6647, 6654, 6699, 6701, 6704, 6709). In these 26 precincts, the official count for absentee ballots was Clinton 876 (88.8%), Sanders 89 (9.0%), the official count for early voting in person was Clinton 1,866 (76.4%), Sanders 561 (23.0%), and the official count for voters at the polls was Clinton 3,722 (72.4%), Sanders 1,375 (26.7%). All absentee ballots were cast on paper, and a targeted audit of these 26 precincts is possible. Texas law provides for a manual audit of 1% of the precincts, randomly selected, where an electronic voting system was used, but the Secretary of State may waive the requirement.
49. Voter turnout in the Democratic presidential primary in Texas was down drastically. The total vote count in 2016 was 1,435,895, less than half, 49.94%, of the total vote count of 2,874,986 in 2008. Part of the reason for this was that, on the Republican side, Texas was crucial to Ted Cruz, and, in Texas, registered independents may vote in either primary. The total vote count in the Republican

presidential primary was 2,836,488 in 2016, more than double, 2.082 times, the total vote count of 1,362,322 in 2008. The total vote count in the Republican and Democratic primaries combined was 4,272,383 in 2016, up slightly, by 0.83%, from the total vote count of 4,237,308 in 2008.

50. In North Carolina, statewide, Clinton lost to Obama in 2008 by 229,722 votes, 887,391 (56.14%) to 657,669 (41.61%), and Clinton defeated Sanders in 2016 by 155,897 votes, 622,915 (54.50%) to 467,018 (40.87%), a net gain of 385,619 votes. North Carolina is one of the states where I have been able to obtain statewide data broken down by type of voting. In North Carolina, statewide, according to the official results, Clinton won with voters at the polls by 51.51% to 43.31%, among early voters by 60.41% to 35.96%, and with absentee voters by 59.23% to 36.50%, Sanders winning among provisional voters by 53.39% to 42.03%. This more than explains the disparity in the unadjusted CNN exit poll, in which Clinton defeated Sanders by 53.8% to 41.7%. That is to say, it reverses the disparity. Or maybe not. North Carolina is one of the eight states where the CNN "exit poll" included telephone polls of early and absentee voters. All voting throughout the state of North Carolina is on paper ballots marked by voters, or on electronic voting machines with a "voter verified paper trail." Precinct results are available statewide. The seven largest counties are analyzed here. Sanders got less than 20% of the vote in 6 of 195 precincts in Mecklenburg County (Charlotte), 1 of 202 precincts in Wake County (Raleigh), 5 of 165 precincts in Guilford County (Greensboro), 8 of 101 precincts in Forsyth County (Winston-Salem), 2 of 77 precincts in Cumberland County (Fayetteville), 1 of 57 precincts in Durham County (Durham), and none of 71 precincts in Buncombe County (Asheville). Altogether, that is 23 of 868 precincts in the seven largest counties in the state. Clinton got less than 10% of the vote in one precinct, Guilford G45 (Sanders 608, Clinton 63), and less than 20% in one other, Mecklenburg 141 (Sanders 498, Clinton 94). North Carolina law does require a random audit, but the requirements are so vague as to be almost meaningless, not defining the percentage to be audited, or what constitutes a "material discrepancy" between the electronic count and the hand count.
51. In Florida, statewide, Clinton defeated Obama in 2008 by 294,772 votes, 870,986 (49.77%) to 576,214 (32.93%), and Clinton defeated Sanders in 2016 by 532,575 votes, 1,101,414 (64.44%) to 568,839 (33.28%), a net gain of 237,803 votes. Most of the urban counties can be audited. Some, but not all, of the votes at the polls in Miami-Dade, Broward, and Palm Beach counties are cast on paper ballots marked by voters. Others, including Duval (Jacksonville), Hillsborough (Tampa), Leon (Tallahassee), and Orange (Orlando), have paper ballots everywhere. I have obtained precinct data for all seven of these counties.
52. In Duval County, Clinton defeated Sanders by 67.07% to 30.70%. There are 199 precincts, identified in fourteen numerical sequences, with some numbers omitted. Sanders got less than 20% of the vote in 32 precincts, among 51 consecutive

precincts (beginning at 701, ending at 1005). In only five of these precincts (806, 807, 812, 904, 1004) did Sanders get less than 10% of the vote (between 9.35% and 9.88%). In Hillsborough County, Clinton defeated Sanders by 62.75% to 35.07%. There are 348 precincts, identified numerically, with many numbers omitted. Sanders got less than 20% of the vote in 18 precincts, including 7 of 11 (beginning at 303, ending at 329). In only one of these, Precinct 241, did Sanders get less than 10% of the vote. In Leon County, Clinton defeated Sanders by 56.51% to 41.12%. There are 132 precincts, identified numerically. Sanders got less than 20% of the vote in only six precincts (1251, 1315, 1317, 1351, 2303, 5165), and less than 10% in zero precincts. In Orange County, Clinton defeated Sanders by 63.81% to 35.09%. There are 251 precincts, identified in six numerical sequences. Sanders got less than 20% of the vote in eighteen precincts, including 8 of 9 (601-604, 606-609), and 7 of 7 (623-629), and less than 10% in zero precincts. In Broward County, Clinton defeated Sanders by 72.50% to 26.48%. The election results are identified by what appear to be ward and precinct. Sanders got less than 20% of the vote in 108 of 577 precincts, including 6 of 24 in Ward J, 11 of 11 in Ward K, 18 of 19 in Ward L, 11 of 25 in Ward W, and 7 of 50 in Ward X, and less than 10% of the vote in 8 of these: (K006, K008, K010, L003, L012, L018, R024, R029).

53. In Miami-Dade County, Clinton defeated Sanders by 74.72% to 24.26%. There are 720 precincts in Miami Dade County, not counting those with fewer than ten voters. Sanders got less than 20% of the vote in 197 of these 720 precincts, including 30 consecutive (212-242), 18 consecutive (244-264), and 8 consecutive (266-276), that is to say, 56 of 58, and less than 10% in 16 of these: (219, 234, 245, 249, 254, 274, 334, 503, 507, 527, 580, 598, 961, 987, 992). In two consecutive precincts (142 and 143), the count was exactly the same: Clinton 351, Sanders 137. These certified numbers may not be not true and correct. The chances of the last two digits matching for both candidates in two consecutive three-digit precincts would be one in ten thousand. There are only 27 occasions in the precinct results where both candidates scored in triple digits in two consecutive precincts, so the odds against this occurring at random anywhere in the precinct results are no better than 27 in 10,000, or 370 to 1.
54. In Palm Beach County, Clinton defeated Sanders by 71.44% to 27.21%. There are 616 precincts in Palm Beach County, not counting those with 25 or fewer voters. The precinct results are broken down by type of voting without giving the sum totals, forcing the researcher to add them all up for any precinct of interest. Sanders got less than 20% of the vote in 97 of these 616, and less than 10% of the vote in only two: Precinct 6012, where the count was Clinton 40, Sanders 4, O'Malley 1, and Precinct 6022, where the count was Clinton 295, Sanders 31, O'Malley 3. There were three precincts in Palm Beach County where, according to the official results, the turnout was better than 100% (Precinct 2112, six registered voters, Clinton 8, Sanders 0; Precinct 2127, zero registered voters,

Clinton 5, Sanders 5; and Precinct 7080, 36 registered voters, Clinton 33, Sanders 4). The certified results actually list the turnout in these precincts as 133.33%, 0.00% (rather than infinity), and 102.86% (at the polls, one of the votes being an absentee ballot). These certified numbers are not true and correct.

55. "Vote Type Summaries" countywide, are available in four of these counties. In Miami-Dade County, Clinton won with voters at the polls by 71.91% to 27.24%, among early voters by 74.22% to 25.11%, and with absentee voters by 79.68% to 18.74%. In Leon County, Clinton won with voters at the polls by 53.17% to 44.79%, among early voters by 59.29% to 38.54%, and with absentee voters by 62.86% to 33.56%. In Orange County, Clinton won with voters at the polls by 58.89% to 40.05%, among early voters by 64.82% to 34.38%, and with absentee voters by 71.54% to 26.99%. In Palm Beach County, Clinton won with voters at the polls by 68.75% to 28.58%, among early voters by 71.59% to 26.85%, and with absentee voters by 75.81% to 21.62%. The differential between Clinton's margin at the polls and her overall margin was 4.06% in Palm Beach County, 5.79% in Miami-Dade County, 7.01% in Leon County, and 9.88% in Orange County. These rates, if similar statewide, would more than explain the disparity of 3.4% in the unadjusted CNN exit poll, except for the fact that Florida is one of the eight states where the CNN "exit poll" included telephone polls of early and absentee voters. Either way, this does not prove that the official counts of early voting and absentee ballots are true and correct, although Florida does require a manual audit of 1% of the precincts, randomly selected, in each county.
56. The question naturally arises as to why Clinton's percentages in predominantly black precincts were so much higher in some southern states than in others. Sanders got less than 10% of the vote in 68 of 315 precincts in East Baton Rouge Parish, Louisiana; 47 of 121 precincts in Montgomery County, Alabama; 58 of 173 precincts in Jefferson County, Alabama; 17 of 80 precincts in Hinds County, Mississippi; 42 of 114 precincts in Memphis, Tennessee; and 20 of 100 precincts elsewhere in southwestern Tennessee. Sanders got less than 10% of the vote in only 11 of 347 precincts in Fulton County, Georgia; 2 of 59 precincts in Harrison County, Mississippi; 2 of 67 precincts in Chattanooga, Tennessee; 8 of 137 precincts in Pulaski County, Arkansas; 2 of 65 precincts in Richmond City, Virginia; 9 of 346 precincts in seven cities in southeastern Virginia; 2 of 593 precincts in Bexar County, Texas; 5 of 199 precincts in Duval County, Florida; 1 of 348 precincts in Hillsborough County, Florida; 8 of 577 precincts in Broward County, Florida; 16 of 720 precincts in Miami-Dade County, Florida; and 2 of 616 precincts in Palm Beach County, Florida. Sanders got less than 10% of the vote in zero precincts in Charleston County, South Carolina; DeKalb County, Georgia; Leon County, Florida; Orange County, Florida; and the seven largest counties in North Carolina.

57. The question remains as to why there were disparities between the unadjusted CNN exit polls and the official results in so many southern states. The disparities in Florida and North Carolina may be explained by the official counts of early and absentee voters, which may or may not be true and correct. But the following exit poll disparities remain unexplained: Alabama (14.0%), Georgia (12.1%), Mississippi (9.4%), Texas (9.3%), Tennessee (8.2%), Arkansas (4.7%), and Virginia (4.4%). Together with Louisiana, where there was no exit poll, and South Carolina, where an NBC exit poll shows a 10.2% disparity, these are the states where Clinton established her insurmountable lead in pledged delegates.
58. Outside the South, as stated previously, the margin favors Clinton in the official results when compared to the unadjusted CNN exit polls in New York (11.7%), Ohio (9.2%), Massachusetts (8.0%), Indiana (5.8%), Michigan (4.8%), Illinois (4.3%), Missouri (3.85%), Pennsylvania (2.7%), Connecticut (2.2%), and Vermont (1.1%). In three states, the margin favors Sanders in the official results when compared to the unadjusted CNN exit polls: Oklahoma (6.2%), Wisconsin (2.0%), and Maryland (1.7%).
59. As stated previously, the final CNN exit polls, adjusted to match the official results, showed Clinton winning 80% to 91% of the black vote in ten southern states, and 67% to 75% of the black vote in eleven states outside the South. These are: Maryland (75%), New York (75%), Indiana (74%), Ohio (71%), Oklahoma (71%), Illinois (70%), Pennsylvania (70%), Connecticut (69%), Wisconsin (69%), Michigan (68%), and Missouri (67%). In three of these states, the margin among black voters had been adjusted upward: in Michigan (from 64%-32% to 68%-28%), New York (from 71%-29% to 75%-25%), and Ohio (from 67%-31% to 71%-28%).
60. As stated previously, in the CNN exit polls, the percentage of the Democratic electorate comprised of black voters was adjusted upward in Indiana (from 17% to 19%), Missouri (from 19% to 21%), and Pennsylvania (from 17% to 19%). In Michigan, the percentage was adjusted downward (from 23% to 21%).
61. In Maryland, statewide, Clinton lost to Obama in 2008 by 218,454 votes, 532,665 (60.66%) to 314,211 (35.78%), and Clinton defeated Sanders in 2016 by 263,252 votes, 573,242 (62.53%) to 309,990 (33.81%), a net gain of 481,706 votes. 85.7% of these net gains, and 82.0% of Clinton's margin of victory, came in Baltimore City, Baltimore County, Montgomery County, and Prince George's County. Maryland is one of the states for which I have obtained statewide data broken down by type of voting. In Maryland, statewide, Clinton won with voters at the polls by 61.07% to 35.06%, among early voters by 69.99% to 26.85%, and with absentee voters by 55.18% to 41.89%. The adjusted CNN exit poll has the black vote at 75% for Clinton, 22% for Sanders. There are paper ballots marked by voters everywhere in Maryland. Any county can be audited. The question is where to look. The answer is Prince George's County. Clinton defeated Sanders by 73.60% to 24.83% in Prince George's County, the

- highest margin in the state. Sanders got less than 20% of the vote in 48 of 270 precincts in Prince George's County, the highest ratio in the state. Five of these precincts were very small, with fewer than twenty voters. Among the others, 37 were in six wards: ten in Ward 6, four in Ward 7, four in Ward 9, six in Ward 12, six in Ward 13, seven in Ward 18. Note that the unadjusted CNN exit poll had Clinton winning Maryland by 63.8% to 33.4%, a disparity of 1.7%. In Maryland it was Sanders, not Clinton, who scored better in the official results than in the exit poll, albeit slightly, and this disparity is increased when compared to the count of voters at the polls rather than the overall vote count.
62. In Indiana, statewide, Clinton defeated Obama in 2008 by 14,192 votes, 646,253 (50.56%) to 632,061 (49.44%), and Clinton lost to Sanders in 2016 by 32,152 votes, 335,014 (52.52%) to 302,862 (47.48%), a net loss of 46,344 votes. There are 92 counties in Indiana. Of these, 58 counties have electronic voting machines with no "voter verified paper trail," 9 counties have paper ballots marked by voters, and 25 counties have a combination of the two. Clinton carried Lake County (Gary), Marion County (Indianapolis), and 17 smaller counties in southern Indiana, alongside or near to the Ohio River. In Lake County, Clinton defeated Sanders by 43,112 (56.70%) to 32,922 (43.30%). There are 523 precincts in Lake County. Sanders got less than 20% of the vote in 46 precincts, including 41 of 106 in Gary, 2 of 79 in Hammond, and 3 of 31 in East Chicago. Lake County, at all polling places, has electronic voting machines with no "voter verified paper trail," so these precincts cannot be audited. By contrast, Marion County, where Clinton defeated Sanders by 59,649 (50.36%) to 58,799 (48.64%), has paper ballots marked by voters. There are 597 precincts in Marion County (not counting three with zero voters). Sanders got less than 20% of the vote in two precincts (0107, Clinton 253, Sanders 57; and LA-41, Clinton 33, Sanders 8). Clinton got less than 20% of the vote in one precinct (24-02, Sanders 36, Clinton 4). Post-election audits in Indiana are not required, and must be requested by the county chairman of a political party.
63. Voter turnout in the Democratic presidential primary in Indiana was down drastically. The total vote count in 2016 was 637,876, less than half, 49.90%, of the total vote count of 1,278,314 in 2008. Part of the reason for this was that, on the Republican side, Indiana was crucial to Ted Cruz, and, in Indiana, registered independents may vote in either primary. The total vote count in the Republican presidential primary was 1,108,460 in 2016, almost triple, 2.686 times, the total vote count of 412,673 in 2008. The total vote count in the Republican and Democratic primaries combined was 1,746,336 in 2016, up slightly, by 3.27%, from the total vote count of 1,690,987 in 2008.
64. In New York, statewide, Clinton defeated Obama in 2008 by 317,477 votes, 1,068,496 (57.37%) to 751,019 (40.32%), and Clinton defeated Sanders in 2016 by 313,724 votes, 1,133,980 (58.03%) to 820,256 (41.97%). The numbers are not much different. The net loss to Clinton was 3,753 votes. There are 62

counties in New York State, including the five boroughs of New York City -- Manhattan (New York County), Bronx, Brooklyn (Kings County), Queens, and Staten Island (Richmond County). Two counties (Nassau and Suffolk) are east of New York City on Long Island, and two counties (Westchester and Rockland) border New York City to the north. Everything else is, for the purposes of this analysis, upstate. In all 53 upstate counties, Sanders got more votes in 2016 than Obama got in 2008, and in all but four (Columbia, Dutchess, Monroe, and Tompkins), Clinton got fewer votes in 2016 than in 2008. The net loss for Clinton upstate was 169,904 votes. Compared to 2008, Clinton also lost ground in Staten Island and Long Island, and barely broke even in Rockland County and Queens. Clinton owes almost all of her net gains, and 79.7% of her statewide margin of victory, to Bronx, Brooklyn, Manhattan, and Westchester County, which she carried, in the aggregate, by 69,815 votes against Obama, and by 250,079 votes against Sanders. The net gain for Clinton in these four counties was 180,264 votes, reversing the trend that prevailed in the rest of the state.

65. In Westchester County, Clinton defeated Obama in 2008 by 8,310 votes, 56,531 (52.40%) to 48,221 (44.70%), and Clinton defeated Sanders in 2016 by 38,147 votes, 74,900 (67.08%) to 36,753 (32.92%), a net gain of 29,837 votes. Clinton's largest net gain, 7,081 votes, came in Mount Vernon, where 60% of the population is black. Sanders got less than 20% of the vote in 57 of 969 precincts, but they are scattered across the county, in 16 of 27 cities and towns, and nothing in the election results stands out as irregular. This is Hillary Clinton's adopted home county, where she would be expected to do well. A manual audit of the ballots from 3% of the optical scanners, selected at random, was conducted by the Westchester County Board of Elections, and I have no reason not to trust the results.
66. For the boroughs of New York City, the precinct results are arranged by Assembly District. Not counting precincts with fewer than twenty voters, Sanders got less than 20% of the vote in 51 of 1649 precincts in Brooklyn, including 25 of 83 precincts in District 58; 48 of 1123 precincts in Manhattan, including 23 of 93 precincts in District 73; and 48 of 892 precincts in the Bronx, including 23 of 85 precincts in District 83. All of these precincts can be audited. New York has paper ballots marked by voters statewide. New York law does require a manual audit of ballots from 3% of voting machines, randomly selected.
67. By contrast, Sanders got less than 20% of the vote in 22 of 1185 precincts in Queens, including 7 of 77 precincts in District 32 (one with only four voters), and no more than four precincts in any other Assembly District.
68. New York had the greatest exit poll disparity outside of the South. The unadjusted CNN exit poll had Clinton defeating Sanders by 52.0% to 47.6%, a margin of 4.4%, and the official results show Clinton defeating Sanders by 58.03% to 41.97%, a margin of 16.1%, which amounts to a disparity of 11.7%. There were 1,954,236 ballots cast statewide, 996,497 in New York City. A shift of 6% from

Sanders to Clinton (52.0% to 58.0%) would amount to 117,254 votes. It is difficult to see how this could have happened in a state with paper ballots, optical scanners, and random audits. The unadjusted CNN exit poll said that 21% of the voters were black, with 71% for Clinton, 29% for Sanders (or 14.9% and 6.1% of the electorate). The adjusted CNN exit poll said that 22% of the voters were black, with 75% for Clinton, 25% for Sanders (or 16.5% and 5.5% of the electorate). That is to say, Clinton's margin among black voters was adjusted by 2.2%, from 8.8% to 11.0% of the electorate, much smaller than the statewide exit poll disparity. I cannot explain these numbers. Either the CNN exit poll was wrong, or the official results are wrong, or both.

69. The New York Board of Elections revealed on April 18, one day before the New York primary, that 126,000 Democrats had been purged from the voter rolls since November 2015. There were hundreds of complaints from voters in Brooklyn who attempted to vote but were told they were not registered. At Brooklyn Borough Hall, for example, about 10% of those who showed up to vote had been removed from the rolls. In some cases, entire buildings and blocks had been removed from the rolls (ref. CNN, New York Times, New York Daily News). The New York City Comptroller has pledged to audit the Board of Elections. Here is how to do it, based on past experience in Ohio. First, get the lists of the voters who were purged. In 2006, the Delaware County Board of Elections provided two spreadsheets listing the names, addresses, precincts, and registration dates of voters who had been purged (ref. Witness to a Crime, page 337). Political parties and voting rights groups should be doing this anyway, to get the voters reregistered. Then, look to see if there is a geographic pattern to the purges. Voters are purged from the rolls because of inactivity, generally for not having voted in the last four years. In Ohio, we calculated a "purge ratio," dividing the percentage of voters purged by the percentage of voters not voting in the preceding presidential election (Witness to a Crime, p. 181). There are twenty full Assembly Districts in Brooklyn (Districts 41-60), and District 64 is shared with Staten Island. The purge ratios for each district should be fairly consistent, as they were in Lucas County, Ohio (Witness to a Crime, page 187). If the purge ratios vary widely, as they did in Cuyahoga County, Ohio (Witness to a Crime, pages 182, 183), the purges were done on a discriminatory basis.
70. In Brooklyn, despite the purge, voter turnout in the Democratic presidential primary was up by 10.7% in 2016 compared to 2008. By comparison, voter turnout was up by 7.49% in Staten Island, up by 3.05% in Queens, up by 2.20% in the Bronx, and down by 0.37% in Manhattan.
71. Outside of New York City, turnout data for 2008 are wrong. Since 1952, if not longer, New York State has reported its undervotes, overvotes, and write-ins, as "blank," "void," and "scattered" or "scattering" (ref. World Almanac). In the 2008 Democratic presidential primary, according to the certified results, "Blank, Void, Scattering" carried four counties (Essex, Oneida, Schoharie, Wyoming),

with 21,111 votes, defeating both Clinton and Obama. These were not real people whose votes were not counted. These were "phantom votes" that crept into the system. Not counting the column for "Blank, Void, Scattering," there were, in these four counties, 21,036 ballots cast in 2008, and 20,827 ballots cast in 2016.

72. In Massachusetts, statewide, Clinton defeated Obama in 2008 by 193,505 votes, 705,185 (56.01%) to 511,680 (40.64%), and Clinton defeated Sanders in 2016 by 17,019 votes, 606,822 (49.90%) to 589,803 (48.50%), a net loss of 176,486 votes. There are 14 counties in Massachusetts. In 11 of 14 counties, Sanders got more votes in 2016 than Obama got in 2008, and Clinton got fewer votes in 2016 than in 2008. The net loss for Clinton in these eleven counties was 200,536 votes. The pattern was reversed in three counties. Clinton made net gains of 420 votes in Dukes County (Martha's Vineyard), and 403 votes in Nantucket County, these being the offshore islands, and 23,227 votes in Suffolk County (Boston). There are four towns in Suffolk County, three of which (Chelsea, Revere, and Winthrop) matched the statewide pattern, the net loss for Clinton being 6,460 votes. Clinton owes her victory to the City of Boston, where she lost to Obama by 9,818 votes in 2008, and defeated Sanders by 19,869 votes in 2016, a net gain of 29,687 votes. There are 22 wards in Boston. In 13 of 22 wards, Clinton got more votes in 2016 than in 2008, and Sanders got fewer votes in 2016 than Obama got in 2008, reversing the trend that prevailed in the rest of the state. These are: Wards 3, 4, 5, 8, 9, 11, 12, 13, 14, 15, 17, 18, 19. These wards are geographically contiguous. In the aggregate, Clinton lost these 13 wards by 17,096 votes to Obama, and won these 13 wards by 19,806 votes against Sanders, a shift of 36,902 votes. 50.37% of this shift, a net gain of 18,586 votes, more than Clinton's statewide margin of victory, occurred in Ward 12 (Roxbury), Ward 14 (Mattapan), Ward 17 (Ashmont), and part of Ward 18 (Precincts 1-6), where Clinton lost every precinct to Obama, and won every precinct against Sanders. The CNN exit poll does not provide a breakdown of the candidates' percentages among black voters, there being too few of them in Massachusetts, only 4% of the Democratic electorate statewide. But there is a statewide exit poll disparity. The unadjusted exit poll had Sanders defeating Clinton by 52.3% to 45.7%, the reverse of the official results, which show Clinton defeating Sanders by 49.90% to 48.50%, a disparity of 8.0%. A shift of 4.0% of the votes from Sanders to Clinton would amount to 48,639 of 1,215,970 ballots cast statewide, or 38.78% of the 125,411 ballots cast in Boston, which simply did not happen. But Clinton's statewide margin of victory was only 17,019 votes, which could have happened with a shift of 8,510 votes, or 6.79% of the 125,411 ballots cast in Boston. There are paper ballots marked by voters everywhere in Massachusetts. The ballots in Boston can be audited, but only by the people. Massachusetts law does not require post-election audits.
73. In Connecticut, statewide, Clinton lost to Obama in 2008 by 14,316 votes, 179,742 (50.70%) to 165,426 (46.66%), and Clinton defeated Sanders in 2016 by 17,647 votes, 170,042 (51.80%) to 152,395 (46.42%), a net gain of 31,963 votes. There are eight counties in Connecticut. Clinton's net gains came in three

counties: Fairfield (21,830 votes), Hartford (11,914 votes), and New Haven (8,557 votes). Clinton's net losses came in five counties: Litchfield (1,355 votes), Middlesex (354 votes), New London (3,244 votes), Tolland (2,431 votes), and Windham (2,954 votes). 91.5% of Clinton's statewide net gain (29,255 of 31,963 votes) occurred in five towns: Hartford (7,606 votes), Bloomfield (4,008 votes), New Haven (8,982 votes), Bridgeport (5,124 votes), and Stamford (3,535 votes). Four of these are the most populous towns in Connecticut, and the other, Bloomfield, is predominantly black, so these numbers are perfectly explainable. The CNN exit poll has the black vote at 69% for Clinton, 30% for Sanders. Census data show that blacks comprise 38.7% of the population in Hartford, 66.06% in Bloomfield, 35.4% in New Haven, 34.6% in Bridgeport, and 13.1% in Stamford. There are paper ballots marked by voters everywhere in Connecticut. These towns can be audited, and probably have been. Connecticut law requires a manual audit of 10% of voting districts.

74. In Michigan, statewide, Sanders defeated Clinton by 17,168 votes, 598,943 (49.68%) to 581,775 (48.26%). There are 83 counties in Michigan. Clinton carried five urban counties along the I-75 corridor (Wayne, Macomb, Oakland, Genesee, Saginaw), and five other counties scattered geographically. Clinton carried Saginaw County by 55.32% to 42.86%. There are 84 precincts in Saginaw County. Sanders got less than 20% of the vote in 7 of 84 precincts (4 in Saginaw City, 3 in Buena Vista Township) and less than 10% in zero precincts. Clinton carried Genesee County by 51.75% to 46.48%. There are 219 precincts in Genesee County. Sanders got less than 20% of the vote in 6 of 219 precincts (5 in Flint City, 1 in Mount Morris Township), and less than 10% in zero precincts. Clinton carried Oakland County by 51.38% to 46.85%. There are 539 precincts in Oakland County. Sanders got less than 20% of the vote in one precinct (Madison Heights 6), and exactly 20% in one other precinct (Bloomfield 31). Clinton carried Macomb County by 48.80% to 47.42%. There are 336 precincts in Macomb County. Sanders got less than 20% of the vote in zero precincts. Clinton carried Wayne County by 60.11% to 38.24%. In Wayne County, outside of Detroit, there are 522 precincts. Sanders got less than 20% of the vote in 4 of 522 precincts, and less than 10% in zero precincts. There are 490 precincts in Detroit. Sanders got less than 20% of the vote in 29 of 490 precincts (seven of these had fewer than twenty voters), and less than 10% in zero of the 22.
75. The official tally of absentee ballots stands in stark contrast. There are 100 lines for absentee ballots at the tail end of the precinct results for Detroit, under the acronym of AVCB (Absent Voter Counting Board). Sanders got less than 20% of the vote in all 100 lines, and less than 10% of the vote in 38 of 100. All told, the official count of absentee ballots is Clinton 22,765 (85.57%), Sanders 2,927 (11.00%), and the official count of voters at the polls is Clinton 69,278 (69.41%), Sanders 30,043 (30.10%). In my expert opinion, based upon years of experience, this is too great a disparity to be credible. The unadjusted CNN exit poll had the

black vote at 64% for Clinton, 32% for Sanders, and these numbers became 68% for Clinton, 28% for Sanders, when adjusted to match the official results.

76. This is a large data set. In Detroit, 21.05% (26,605 of 126,412) of the ballots cast in the Democratic presidential primary were absentee. The ratio is similar for Oakland County, where 19.18% (34,467 of 179,656) ballots cast were absentee, and Clinton lost with voters at the polls by 75,387 (51.92%) to 68,882 47.44%, but won among absentee voters by 23,418 (67.94%) to 8,776 (25.46%), and I never did trust these numbers either. I was initially unable to download precinct results for Oakland County, and I still cannot find vote type summaries for Macomb, Genesee, or Saginaw counties, or for Wayne County outside of Detroit.
77. After reviewing these numbers, I contacted elections officials in many states, asking for the candidates' vote totals, statewide, broken down by type of voting, that is, early voting (if any), at the polls, absentee, and provisional. As of this writing, only Georgia, Maryland, and North Carolina have provided the data. In Georgia, statewide, Clinton won with voters at the polls by 69.57% to 29.93%, among early voters by 78.37% to 21.16%, and with absentee voters by 72.19% to 26.43%. In Maryland, statewide, Clinton won with voters at the polls by 61.07% to 35.06%, among early voters by 69.99% to 26.85%, and with absentee voters by 55.18% to 41.89%. In North Carolina, statewide, Clinton won with voters at the polls by 51.51% to 43.31%, among early voters by 60.41% to 35.96%, and with absentee voters by 59.23% to 36.50%. Whether or not these numbers are true and correct, disparities do occur among types of voting. But not of the magnitude we see in Detroit, where Clinton defeated Sanders by a 4 to 1 margin in only 29 of 490 precincts (seven of them small) on Election Day, and by at least 4 to 1, as much as 20 to 1 (207 to 10, at AVCB 47), in every one of 100 AVCBs.
78. I have received a statement, in writing, from the Bureau of Elections in Lansing, Michigan, stating that:

AVCB is the abbreviation for "Absent Voter Counting Board." Under Michigan law the City of Detroit can set up a number of "counting boards" to count absentee ballots. They act as precincts for absentee voters. For the March Primary Detroit used 100 counting boards to count absentee ballots. The AVCB results are the absentee votes for Detroit's 490 precincts.

This appears to be a special case. I have the precinct results for five other jurisdictions in Michigan, including the rest of Wayne County, and there are no AVCBs. It appears that absentee ballots are counted in their standard precincts, except in Detroit. Because the 100 AVCBs serve as substitutes for 490 standard precincts, nothing short of a full audit of all absentee ballots, and a citywide examination of the list of absentee voters, will suffice.

79. I have subsequently downloaded the precinct results for Oakland County, Michigan. There are 52 towns and municipalities, with 520 precincts. Among these are 15 towns, with 42 precincts, for which we have only the precinct totals. For the other 37 towns and municipalities, with 478 precincts, the vote counts for each candidate in each precinct are broken down by absentee ballots and voters at the polls, making possible the sort of analysis that regrettably cannot be done in Detroit. As previously stated, Clinton lost with voters at the polls by 51.92% to 47.44%, but won among absentee voters by 67.94% to 25.46%. In only one precinct was Sanders' percentage at the polls as low as his countywide percentage for absentee ballots: Oak Park 10, Clinton 397 (73.5%), Sanders 137 (25.3%).
80. One of the most striking things about the precinct results for absentee ballots in Oakland County are the vote counts for Uncommitted. Among voters at the polls, Uncommitted won 695 of 145,189 votes (0.48%). Among absentee ballots, Uncommitted won 2,129 of 34,467 votes (6.18%), and got at least 10% of the vote in 103 of 478 precincts. And this underestimates the absentee ballot count for Uncommitted, because 179 of the 695 votes attributed to the polling places appear in 12 of the 15 towns for which the absentee ballots are not differentiated from votes cast at the polls. In my expert opinion, it is highly unlikely that so many voters took the time to request, fill out, and mail in an absentee ballot, only to choose Uncommitted for President (that is, uncommitted delegates). If this did not happen, then the official results are not true and correct, and it calls into question the absentee ballot counts in Detroit and elsewhere.
81. The absentee ballot counts in Oakland County are easier to analyze at the town level. As stated previously, there are 37 towns and municipalities for which separate counts for absentee ballots and voters at the polls are available. Sanders lost the absentee ballot count in all but one of them, having won the vote count at the polls countywide. At the polls, Sanders won the count in 27 of these towns and municipalities, by 42,906 (58.43%) to 30,034 (40.90%), in the aggregate, but among absentee ballots, Clinton won the count by 11,053 (61.14%) to 5,564 (30.78%), with 1,369 (7.57%) for Uncommitted. At the polls, Clinton won the count in 10 of these towns and municipalities, by 33,266 (59.74%) to 22,190 (39.85%), in the aggregate, but among absentee ballots, Clinton won the count by 12,365 (75.37%) to 3,210 (19.57%), with 775 (4.72%) for Uncommitted. If the absentee vote counts for Uncommitted are incorrect, then the absentee vote counts for Clinton and Sanders cannot be trusted.
82. The official absentee ballot counts in Detroit and Oakland County go a long way toward explaining the exit poll disparity in Michigan. The unadjusted CNN exit poll had Sanders defeating Clinton by 52.05% to 45.85%, and the official results show Sanders defeating Clinton by 49.68% to 48.26%, a disparity of 4.8%. If the absentee ballot counts in Detroit and Oakland County are subtracted from the statewide results, the remainders are Sanders 587,240 (51.56%), Clinton 535,592 (47.02%). This reduces the exit poll disparity to 1.66%, which might

be explained by absentee ballot counts elsewhere in the I-25 corridor, if we only had the data. And this raises the disturbing possibility that exit poll disparities in other states might be explained by erroneous or fraudulent counts of absentee ballots, and of early voting (if any).

83. Michigan has paper ballots marked by voters everywhere in the state. But Michigan does not conduct post-election audits. All the absentee ballots in Detroit, and in Oakland County, should be audited. If the absentee ballots are still separate from the ballots cast by voters at the polls, I would ask for a court order to keep them that way, to help make a meaningful audit possible. Here is how to do it, based on past experience in Ohio. First, get the list of names of all the voters who requested absentee ballots. The Board of Elections in Cuyahoga County, Ohio, provided for the 2004 election a spreadsheet, sorted by standard precinct, containing the names and home addresses of every voter who requested an absentee ballot, the date the ballot was requested, and the date the ballot was returned to the Board of Elections (*Witness to a Crime*, page 233). The number of absentee ballots returned in a timely manner should equal the sum total of votes counted by the 100 ACVBs. Then, examine the ballots. If they are still divided according to ACVB, there should be 100 stacks of ballots, each of which should match the official vote count. And look to see if the ballots are identified by standard precinct. If so, this would provide a further check when compared, precinct by precinct, to the names of voters whose absentee ballots were returned in a timely manner. Finally, there should be ballot accounting charts for each precinct, or each ACVB, showing that the number of ballots cast, plus the number of spoiled ballots, plus the number of unused ballots, equals the number of ballots delivered in the first place; all ballots, whether voted, spoiled, or unused, should be available for counting; and there should be numbered "stubs" torn from each voted or spoiled ballot, matching the ballot stub numbers assigned to each voter who signed the poll book, to prove that ballot substitution has not taken place.
84. There are serious chain of custody issues involved with absentee voting (and early voting). The longer the elapsed time between the casting of ballots and the counting of ballots, the greater the opportunity for ballot tampering. Our examination of the actual ballots in Ohio (*Witness to a Crime*), uncovered proof of extra absentee ballots in Cuyahoga County (pages 232-237), Van Wert County (page 284), and Clermont County (pages 297-298, 302); extra provisional ballots in Miami County (pages 249-250); missing absentee ballots in Miami County (pages 250-252); ballot substitution in Darke County (page 272), Clermont County (page 298), and in Miami County, where a box of ballots was flagrantly labeled as "remakes" (pages 252-255); "wild card" ballots with no precinct identified in Darke County (page 274-275); counterfeit ballots in Mercer County (pages 276-279); ballot alteration in Clermont County (pages 290-294, 306-307); and sorting of ballots according to candidate, proof of unauthorized access, in Butler County (pages 312-313) and Delaware County (page 341).

85. In Wisconsin, statewide, Clinton lost to Obama in 2008 by 192,897 votes, 646,851 (58.08%) to 453,954 (40.76%), and Clinton lost to Sanders in 2016 by 136,453 votes, 570,192 (56.59%) to 433,739 (43.05%), in 2016. The net gain for Clinton was 56,444 votes. Clinton's largest net gain, by far, came in Milwaukee County, where Clinton lost to Obama in 2008 by 59,071 votes, 132,501 (63.69%) to 73,430 (35.30%), but defeated Sanders in 2016 by 7,130 votes, 100,798 (51.68%) to 93,668 (48.02%), a net gain of 66,201 votes, greater than her net gain statewide. The unadjusted CNN exit poll had Sanders defeating Clinton by 55.0% to 43.5%, a disparity of 2.0%, with the official results favoring Sanders, not Clinton. The CNN exit poll had the black vote at 69% for Clinton, 31% for Sanders. The wards in Wisconsin are the size of precincts in other states. There are 325 wards in Milwaukee. Sanders got less than 10% of the vote in zero wards, less than 20% of the vote in 2 of 325 wards (106 and 108), and less than 25% of the vote in 15 of 325 wards (including 104-110 and 112-114). Clinton got less than 10% of the vote in zero wards, less than 20% of the vote in 6 of 325 wards (128, 130, 136-138, and 325), and less than 25% of the vote in 10 of 325 wards (including 133-138). These numbers are balanced, unlike most of the states I have examined. If anything should be audited in Wisconsin, it would be these wards, but it may have already been done. All of Milwaukee County has paper ballots marked by voters, and Wisconsin does conduct post-election audits of 5% of the ballots cast on each type of machine.
86. In Illinois, statewide, Clinton lost to Obama in 2008 by 650,304 votes, 1,318,234 (64.66%) to 667,930 (32.76%), and Clinton defeated Sanders in 2016 by 40,061 votes, 1,039,555 (50.56%) to 999,494 (48.61%). The net gain for Clinton was 690,365 votes. Clinton's net gains came mostly in Cook County. In Chicago, Clinton lost to Obama in 2008 by 301,853 votes, 462,503 (72.80%) to 160,650 (25.29%), and Clinton defeated Sanders in 2016 by 59,314 votes, 380,208 (53.69%) to 320,894 (45.32%), a net gain of 361,167 votes. In suburban Cook County, Clinton lost to Obama in 2008 by 127,199 votes, 281,183 (63.36%) to 153,984 (34.70%), and Clinton defeated Sanders in 2016 by 37,181 votes, 253,092 (53.62%) to 215,911 (45.74%), a net gain of 164,380 votes. There are 1,599 precincts in suburban Cook County, and most were quite competitive. Sanders got less than 20% of the vote in only four precincts (Bloom 10, Bloom 29, Thornton 9, and Wheeling 24), and exactly 20% in one other (Bloom 21). Clinton got less than 20% of the vote in one precinct (Palos 25).
87. The official results in Chicago demand more scrutiny. There are 50 wards in Chicago. In 2008, against Obama, Clinton got less than 10% of the vote in 13 of 50 wards (3, 4, 5, 6, 7, 8, 9, 17, 20, 21, 24, 28, 34), and barely 10% in two others (10.26% in Ward 29, 10.00% in Ward 37). One may safely assume that these 15 wards have predominantly black populations. In 2016, against Sanders, Clinton's percentages in these wards ranged from 56.15% in Ward 5 to 67.87% in Ward 21. The CNN exit poll, adjusted to match the official results, has the black vote at 70% for Clinton, 30% for Sanders, a percentage which, according

to the official results, Clinton did attain at the precinct level. There are 2,069 precincts in Chicago. In no precinct did Sanders get less than 10% of the vote. Sanders got less than 20% of the vote in only 5 precincts, scattered across the city. In 257 precincts, Sanders got less than 30% of the vote. 190 of these precincts were in eleven wards (16 of 48 in Ward 6, 13 of 46 in Ward 7, 16 of 56 in Ward 8, 17 of 51 in Ward 9, 14 of 36 in Ward 16, 15 of 41 in Ward 17, 22 of 54 in Ward 21, 21 of 46 in Ward 28, 14 of 44 in Ward 29, 28 of 53 in Ward 34, and 14 of 42 in Ward 37). These widespread numbers present no obvious choice for a targeted audit. But there is an exit poll disparity in Illinois that must be addressed. The unadjusted CNN exit poll had Sanders defeating Clinton by 50.7% to 48.3%, the reverse of the official results, which show Clinton defeating Sanders by 50.56% to 48.61%, a disparity of 4.3%. A shift of 2.15% of the votes from Sanders to Clinton would amount to 44,205 of 2,056,047 ballots cast statewide, or 6.22% of the 710,654 ballots cast in Chicago. Clinton's statewide margin of victory was only 40,061 votes, which could have happened with a shift of 20,031 votes, or 2.82% of the ballots cast in Chicago. Considering what happened in Detroit, what is needed for Chicago is a breakdown by type of voting. Illinois allows both early voting and, of course, absentee ballots. I have been unable to obtain the candidates' vote totals broken down by type of voting, but the statewide breakdown for both parties combined was 83.67% at the polls, 12.84% early voting, 3.23% absentee, and 0.26% provisional. In suburban Cook County, the breakdown for both parties combined was 78.32% at the polls (including provisional ballots), 16.20% early voting, and 5.48% absentee. Some polling places in Chicago had paper ballots marked by voters, others had electronic voting machines with a "voter verified paper trail." Wards with paper ballots and optical scanners would be easier to audit. Early voting and absentee ballots would be the places to look, if these ballots are not now mixed together with the ballots of voters at the polls. Illinois law does require an audit of 5% of the precincts in each election jurisdiction, but votes cast on optical scan ballots are not subject to hand counting, and are retabulated by machine only.

88. In Missouri, statewide, Clinton lost to Obama in 2008 by 11,732 votes, 406,917 (49.32%) to 395,185 (47.90%), and Clinton defeated Sanders in 2016 by 1,574 votes, 312,285 (49.61%) to 310,711 (49.36%). The net gain for Clinton was 13,306 votes. There are 114 counties in Missouri, plus St. Louis City and Kansas City, which are separate election jurisdictions. 65 counties carried by Clinton in 2008 were carried by Sanders in 2016. Only three jurisdictions were in reverse of the statewide trend. In St. Louis County, Clinton lost to Obama in 2008 by 51,340 votes, 118,143 (62.78%) to 66,803 (35.50%), and Clinton defeated Sanders in 2016 by 18,280 votes, 89,559 (55.30%) to 71,279 (44.01%). The net gain for Clinton was 69,620 votes. In St. Louis City, Clinton lost to Obama in 2008 by 29,487 votes, 47,813 (71.09%) to 18,326 (27.25%) in 2008, and Clinton defeated Sanders in 2016 by 6,787 votes, 35,050 (54.97%) to 28,263 (44.33%). The net gain for Clinton was 36,274 votes. In Kansas City, Clinton lost to Obama in 2008 by 20,079 votes, 40,057 (65.91%) to 19,978 (32.87%),

and Clinton defeated Sanders in 2016 by 6,614 votes, 28,998 (56.14%) to 22,384 (43.33%). The net gain for Clinton was 26,693 votes.

89. There are exit poll disparities in Missouri that must be addressed. The unadjusted CNN exit poll had Sanders defeating Clinton by 51.0% to 47.4%, the reverse of the official results, which show Clinton defeating Sanders by 49.61% to 49.36%, a disparity of 3.85%. The final CNN exit poll, adjusted to match the official results, has the black vote at 67% for Clinton, 32% for Sanders, and the percentage of the Democratic electorate comprised of black voters was revised upward from 19% to 21%. According to 2010 census estimates, there were 695,000 black residents in Missouri, and of these, 157,000 (22.6%) lived in St. Louis City, and 137,000 (19.7%) lived in Kansas City. A shift of 1.925% of the votes from Sanders to Clinton would amount to 12,116 of 629,425 ballots cast statewide, or 19.00% of the 63,758 ballots cast in St. Louis City, or 17.80% of the 68,071 ballots cast in Kansas City, or some combination of the two. But Clinton's statewide margin of victory was only 1,574 votes, which could have happened with a shift of a mere 787 votes almost anywhere in the state.
90. In St. Louis City, a breakdown by full ward for 2008 was readily available, and the number of wards has not changed, so I added up the precinct totals, ward by ward, for 2016, for direct comparison. In 2008, Clinton got between 10% and 15% of the vote in 11 of 28 wards (1, 2, 3, 4, 5, 18, 19, 21, 22, 26, 27). One may safely assume that these are wards with predominantly black populations. In no other ward did Clinton get less than 24% of the vote. In 2016, in these same 11 wards, Sanders got between 25.02% and 37.60% of the vote. In no other ward did Sanders get less than 40% of the vote. There are 217 precincts in St. Louis City, excluding five with fewer than five voters. Sanders got less than 20% of the vote in two precincts, both in Ward 27 (18.39% in Precinct 3, 19.83% in Precinct 5), and less than 30% of the vote in 58 precincts, 51 of them in seven wards (6 of 7 in Ward 1, 6 of 7 in Ward 2, 6 of 9 in Ward 3, 10 of 10 in Ward 4, 9 of 9 in Ward 21, 6 of 8 in Ward 22, 8 of 8 in Ward 27). The precinct results are broken down by type of voting, that is, at the polls, absentee, and provisional (Missouri does not allow early voting). In St. Louis, citywide, Clinton won with voters at the polls by 54.20% to 45.22%, and with absentee voters by 71.45% to 25.20%, a wide disparity, but unlike Detroit, where 21.05% (26,605 of 126,412) of the ballots cast in the Democratic presidential primary were absentee, in St. Louis City, only 5.85% (3,733 of 63,758) of the ballots cast were absentee. The effect on her overall percentage was small, Clinton winning 54.20% of the vote count at the polls, and 54.97% of the vote count overall. But what matters in elections are the margins. Clinton won with absentee voters in St. Louis by 2,178 votes (2,907 to 729), and this more than accounts for her statewide margin of victory. The margins were impressive, for example, 128 to 6 in Ward 1, 81 to 6 in Ward 2, 96 to 7 in Ward 3, 140 to 13 in Ward 21, all above 90%, and 90 to 13 in Ward 4, 93 to 17 in Ward 5, 127 to 27 in Ward 18, 91 to 17 in Ward 19, 83 to 17 in Ward 22, 99 to 19 in Ward 27, all above 80%.

91. In Kansas City, the precinct results are curiously combined, with multiple precincts per line. There are 140 such lines (excluding one with no voters). Sanders got less than 20% of the vote in zero of them, and less than 30% of the vote on 21 lines, including 5 of 8 for Ward 3. The combinations were different in the 2008 precinct results, and no direct comparison is possible without tallying up the ward totals for both elections, which is not attempted here. But let us look at the absentee ballots. In Kansas City, citywide, Clinton won with voters at the polls by 55.60% to 43.91%, and with absentee voters by 70.59% to 27.73%, again a wide disparity, but only 3.57% (1,843 of 51,656) of the ballots cast were absentee (the count was Clinton 1301, Sanders 511). The effect on Clinton's overall percentage was small, Clinton winning 55.60% of voters at the polls, and 56.14% of voters overall. Some of the absentee margins were impressive, for example, 64 to 7 in Ward 17, above 90%, and 95 to 13 in Ward 3, 53 to 8 in Ward 15, 118 to 26 in Ward 16, and 43 to 10 in Ward 18, all above 80%.
92. The absentee ballots in St. Louis City and Kansas City could easily be audited, as they are paper ballots marked by voters, whereas in much of Missouri, including parts of St. Louis City and parts of Kansas City, many polling places used electronic voting machines with a "voter verified paper trail," which is much more difficult to audit. Missouri does require a manual recount of 1% of the precincts, but neither Bernie Sanders, who lost the Democratic primary by 1,574 votes, or Ted Cruz, who lost the Republican primary by 1,965 votes, asked for a recount, which would have been undertaken at state expense.
93. In Ohio, statewide, Clinton defeated Obama in 2008 by 203,851 votes, 1,259,620 (53.49%) to 1,055,769 (44.84%) in 2008, and Clinton defeated Sanders in 2016 by 161,286 votes, 696,681 (56.12%) to 535,395 (43.13%) in 2016. The net loss for Clinton was 42,565 votes. Amid such a steep decline in voter turnout, Clinton got fewer votes in 2016 than in 2008 in all of Ohio's 88 counties. The total vote count in 2016 was 1,241,478, barely half, 52.72%, of the total vote count of 2,354,721 in 2008. On the Republican side, Ohio was crucial to John Kasich, and, in Ohio, unaffiliated voters may vote in either primary. The total vote count in the Republican presidential primary was 1,988,960 in 2016, almost double, 1.878 times, the total vote count of 1,059,137 in 2008. The total vote count in the Republican and Democratic primaries combined was 3,230,438, down slightly, by 5.37%, from the total vote count of 3,413,858 in 2008.
94. Clinton lost five counties to Obama in 2008 (Cuyahoga, Delaware, Franklin, Hamilton, Montgomery), all of which she won against Sanders. Four of these counties are analyzed here, as is Summit County, which Clinton carried twice.
95. In Franklin County, where Columbus is located, Clinton lost to Obama in 2008 by 33,995 votes, 130,498 (57.00%) to 96,503 (42.15%), and Clinton defeated Sanders in 2016 by 15,752 votes, 88,257 (54.74%) to 72,505 (44.97%). There are 821 precincts in Franklin County. Sanders got less than 20% of the vote in zero

- precincts. Clinton got less than 20% of the vote in 14 precincts: Columbus 16-A, 16-C, 16-D, 16-E, 18-A, 39-A, 39-C, 39-D, 41-B, 41-C, 41-D, 41-E, 41-F, 41-G, all in the University District, east of the Olentangy River, across from Ohio State University. The official count in these 14 precincts was Sanders 1733, Clinton 295.
96. In Summit County, where Akron is located, Clinton defeated Obama in 2008 by 12,627 votes, 71,175 (54.05%) to 58,548 (44.46%), and Clinton defeated Sanders in 2016 by 9,140 votes, 39,653 (56.25%) to 30,513 (43.28%). Although Clinton's percentage went up, the lower turnout resulted in a net loss for Clinton of 3,487 votes. There are 137 precincts in Akron. Sanders got less than 20% of the vote in zero precincts, and less than 30% in only four: 3I, 4G, 4J, 8E.
97. In Hamilton County, where Cincinnati is located, Clinton lost to Obama in 2008 by 43,860 votes, 103,294 (63.04%) to 59,434 (36.27%), and Clinton defeated Sanders in 2016 by 18,625 votes, 59,686 (59.05%) to 41,061 (40.62%). The net gain for Clinton was 62,485 votes. Clinton won with voters at the polls by 52,635 (57.60%) to 37,989 (41.57%), and with absentee voters by 7,052 (68.17%) to 3,073 (29.71%), again, a large disparity. The absentee ballots would be the easiest to audit, being paper ballots marked by voters, whereas voters at the polls in Hamilton County used paper ballots in some locations, and electronic voting machines with a "voter verified paper trail" in other locations. I have been unable to obtain the absentee vote counts at the precinct level. But the precinct results for Hamilton County do include subtotals for each ward and each town, which allows for easy overview. In Cincinnati, citywide, Clinton defeated Sanders by 9,316 votes, 28,558 (59.21%) to 19,242 (39.89%). Clinton's highest ratios came in Ward 3 (1,216 to 480), Ward 7 (2,526 to 730), Ward 13 (1,398 to 670), and Ward 18 (239 to 88). There are 556 precincts in Hamilton County, 185 of them in Cincinnati. Sanders got less than 10% of the vote in zero precincts; less than 20% of the vote in 6 precincts (7-B, 7-F, 7-K, 13-A, 13-G, 18-B), and less than 25% in 16 others (3-E, 7-C, 7-D, 7-G, 7-H, 7-I, 7-J, 9-C, 9-D, 15-D, 15-J, 21-E, 24-F, 24-I, 26-D, 26-E). From these data it seems obvious that Ward 7 should be audited. Be it noted, as an outlier, that the highest ratio in Cincinnati was in Precinct 12-B, where Sanders defeated Clinton by 227 to 34.
98. In Montgomery County, where Dayton is located, Clinton lost to Obama in 2008 by 12,536 votes, 64,232 (54.77%) to 51,696 (44.08%), and Clinton defeated Sanders in 2016 by 10,607 votes, 34,149 (58.93%) to 23,542 (40.62%). The net gain for Clinton was 23,143 votes. In Dayton, Clinton lost to Obama in 2008 by 11,642 votes, 22,379 to 10,737, accounting for almost her entire countywide margin of defeat; and Clinton defeated Sanders in 2016 by 4,276 votes 10,862 to 6,586, a net gain of 15,918 votes. Ten wards account for these net gains (Wards 5, 6, 7, 13, 14, 15, 16, 19, 21, 22). Clinton lost these ten wards, in the aggregate, to Obama by 11,704 votes, 13,584 (87.54%) to 1,880 (12.12%), and won these ten wards, in the aggregate, against Sanders, by 4,315 votes, 6,256 (76.16%) to 1,941 (23.63%). There are 95 precincts in Dayton. Sanders got less than 20%

of the vote in 8 precincts (6-B, 6-C, 6-D, 15-D, 16-D, 19-E, 21-B, 22-C), and less than 25% of the vote in 11 others (6-A, 13-A, 14-A, 14-D, 15-A, 15-C, 16-B, 16-E, 19-D, 21-A, 21-C). These would be the precincts to audit, but the task would be difficult. Voters at the polls in Montgomery County used electronic voting machines with a "voter verified paper trail." Paper ballots marked by voters were used only for absentee ballots. I have been unable to obtain for Montgomery County the candidates' vote totals broken down by type of voting, but given the numbers in Hamilton County (above), and Cuyahoga County (below), it might be interesting to hand count the absentee ballots.

99. In Cuyahoga County, where Cleveland is located, Clinton lost to Obama in 2008 by 30,849 votes, 190,902 (53.86%) to 160,053 (45.15%), and Clinton defeated Sanders in 2016 by 54,422 votes, 130,287 (62.91%) to 75,865 (36.63%). The net gain for Clinton was 85,271 votes. There are 336 precincts in Cleveland. Sanders got less than 10% of the vote in zero precincts. Sanders got less than 20% of the vote in 55 precincts (including 8 of 20 in Ward 1, 10 of 23 in Ward 2, 11 of 21 in Ward 4, 4 of 19 in Ward 5, 3 of 21 in Ward 6, 6 of 23 in Ward 7, 4 of 18 in Ward 8, 4 of 24 in Ward 9, and 5 of 22 in Ward 10). Sanders got less than 25% of the vote in 112 precincts (including 19 of 20 in Ward 1, 16 of 23 in Ward 2, 19 of 21 in Ward 4, 6 of 19 in Ward 5, 9 of 21 in Ward 6, 11 of 23 in Ward 7, 6 of 18 in Ward 8, 10 of 24 in Ward 9, and 13 of 22 in Ward 10). There are 644 precincts outside of Cleveland. Sanders got less than 10% of the vote in zero precincts. Sanders got less than 20% of the vote in 19 precincts (including 4 of 15 in East Cleveland, and 6 of 12 in Warrensville Heights). Sanders got less than 25% of the vote in 54 precincts, including 14 of 15 in East Cleveland, and 10 of 12 in Warrensville Heights. There are paper ballots marked by voters everywhere in Cuyahoga County. Clearly, Wards 1, 2, and 4, and East Cleveland, and Warrensville Heights, should be audited, including the absentee ballots.
100. I have been able to obtain separate data, countywide and at the precinct level, for absentee ballots and voters at the polls in Cuyahoga County. Clinton won with voters at the polls by 88,352 (59.82%) to 58,828 (39.83%), and with absentee voters by 37,562 (73.02%) to 13,469 (26.18%), again, a large disparity. I have also found a table entitled "Vote by Mail Ballots Requested and Returned," in which it is stated that 54,594 absentee ballots were returned by Democratic voters countywide. The total number of absentee votes counted was 51,438 (including 407 votes for Rocky De La Fuente), which means that 3,156 absentee ballots were not counted. Officially, there were 18 overvotes and 925 undervotes, which still leaves 2,213 absentee ballots unaccounted for. According to the official results, Sanders got less than 20% of the absentee ballots in 155 of 336 precincts in Cleveland, and in 129 of 644 precincts elsewhere in Cuyahoga County. Sanders got less than 10% of the absentee ballots in 52 of 336 precincts in Cleveland, and in 25 of 644 precincts elsewhere in Cuyahoga County. The absentee ballot counts were 1356 to 195 in Ward 1, 723 to 77 in Ward 2, 816 to 168 in Ward 4, 262 to 64 in Ward 5, 685 to 187 in Ward 6, 499 to 119

- in Ward 7, 512 to 178 in Ward 8, 760 to 162 in Ward 9, 696 to 124 in Ward 10, 632 to 97 in East Cleveland, and 754 to 104 in Warrensville Heights. By comparison, Clinton got less than 20% of the absentee ballots in exactly one precinct, Cleveland 5-Q, where the count was Sanders 7, Clinton 1.
101. The official absentee ballot counts in Hamilton County and Cuyahoga County do not explain the exit poll disparity in Ohio. The unadjusted CNN exit poll had Clinton defeating Sanders by 51.4% to 47.6%, and the official results show Clinton defeating Sanders by 56.12% to 43.13%, a disparity of 9.2%. If the absentee ballot counts in Hamilton County and Cuyahoga County are subtracted from the statewide results, the remainders are Clinton 652,067 (55.27%), Sanders 518,853 (43.98%). This only reduces the exit poll disparity to 7.5%. Cuyahoga County is the most populous county in Ohio, and Hamilton County is the third, with 18.05% of the statewide population between them. Their absentee ballots account for 18.5% of the exit poll disparity, suggesting that a similar differential between the counts of absentee ballots and voters at the polls might have prevailed statewide. But even this might not account for the disparity, because Ohio is one of the eight states where the CNN "exit poll" included telephone polls of early and absentee voters
 102. I would have analyzed Pennsylvania, but there is almost nothing to audit. There are 67 counties in Pennsylvania, and 50 of them, in all their polling places, use electronic voting machines with no "voter verified paper trail. Only 13 counties have paper ballots at all their polling places. Another 4 counties have electronic voting machines in some places, and paper ballots in others. Of the 13 counties where every vote cast can be audited, only one is an urban county, Lackawanna, where Scranton is located. In the five largest cities (Philadelphia, Pittsburgh, Allentown, Erie, Reading), at every polling place, the voter touches a screen, or pushes a button, and the machine records something, but there is no paper trail, no way to know if the vote has been counted as cast. This is "black box voting." The system is non-transparent. Its functions are hidden from the public.
 103. I have obtained precinct results for Lackawanna County, where Sanders got less than 20% of the vote in zero of 163 precincts, and less than 30% of the vote in two (Carbondale W-06 P-01, and Scranton W-09 P-01). And I have obtained the precinct results for Allegheny County, where Sanders got less than 20% of the vote in 13 of 1319 precincts, seven of them in Pittsburgh, and Clinton got less than 20% of the vote in one (Pittsburgh Ward 4 District 8). But no audit of a Democratic primary in Pennsylvania is meaningful without Philadelphia. In Pennsylvania, statewide, Clinton defeated Sanders by 203,226 votes, 935,107 (55.61%) to 731,881 (43.53%). Of the 1,681,427 votes counted in the Democratic primary, 349,805 (20.8%) were in Philadelphia. There are 66 wards, with 1685 precincts, in Philadelphia. Election results by ward are readily available, and Sanders got less than 20% in two of them: Ward 7 (Clinton 2714, Sanders 620), and Ward 19 (Clinton 2252, Sanders 559). But precinct results are available only

on a spreadsheet with 410,236 lines, 243 lines per precinct, and the lines for Clinton and Sanders must be extracted from these, one precinct at a time, which does not seem worth the effort, as there are no paper ballots at the polls, and there were only 3628 absentee ballots cast in the entire city of Philadelphia, which amounts to 1.04% of 349,805 votes counted, and there is no separate count for absentee ballots, so there is nothing much to audit.

104. I would have analyzed Arizona, but the precinct results in many counties are, to the average citizen, indecipherable. According to an email from the Elections Services Division of the Arizona Secretary of State's office:

After each election, the counties send an export from their election management system exhibiting the total votes cast in each precinct. These results are exported as text files which we have made publically (sic) available on our website. As you will see, there is a file labeled "!File Type Descriptions.xlsx." This file will assist you in deciphering each county file and can assist you in opening the text files in excel is (sic) you choose to do so.

The files are posted in the format we receive them from the counties.
<http://apps.azsos.gov/results/2016/PPE/>

You'll need to contact the county election departments directly if you have further questions regarding the precinct level election results.
<http://www.azsos.gov/elections/voting-election/contact-information-county-election-officials>

No United States citizen should have to "decipher" the files for the results of elections for public office. One should not need to be an IT specialist with the proper software. All readers of this Declaration are urged to click on the first above link, and open the files themselves, and see if they can decipher them.

105. I have obtained, from the Elections Department of Pima County, precinct results in a perfectly readable format. From these it may readily be seen why there was no CNN exit poll. It would have been almost useless to conduct an exit poll in Arizona. In Pima County, the second most populous county in Arizona, where Tucson is located, which accounts for 108,515 (23.27%) of 466,235 votes cast in the Democratic primary, 87,234 (80.38%) were early voters, 17,762 (16.37%) were at the polls, and 3,519 (3.24%) were provisional ballots. If similar percentages prevail statewide, an exit poll would have reflected only one-fifth of the electorate. For the record: according to the official results, which are not necessarily true and correct, Clinton won with early voters, 51,829 (59.41%) to 34,042 (39.02%), Sanders won with voters at the polls, 10,004 (56.32%) to 7,560 (42.56%), and Sanders won with provisional voters, 2,227 (63.29%) to 1,261 (35.83%). An exit poll might have shown Sanders as the winner.

106. The question lingers as to why Clinton's percentages among early and absentee voters were so much higher than her percentages among voters at the polls. In Charleston County, South Carolina, Clinton got 63.99% at the polls, and 79.58% of the absentee ballots. In Georgia, statewide, Clinton got 69.57% at the polls, and 78.37% among early voters. In Dallas County, Texas, Clinton got 69.13% at the polls, 75.26% among early voters, and 78.90% of the absentee ballots. In North Carolina, statewide, Clinton got 51.51% at the polls, 60.41% among early voters, and 59.23% of the absentee ballots. In four counties in Florida (Leon, Miami-Dade, Orange, Palm Beach), Clinton got 66.41% at the polls, and 75.76% of the absentee ballots. In Detroit, Michigan, Clinton got 69.41% at the polls, and 85.57% of the absentee ballots. In Oakland County, Michigan, Clinton got 47.44% at the polls, and 67.94% of the absentee ballots. In St. Louis, Missouri, Clinton got 54.20% at the polls, and 71.45% of the absentee ballots. In Kansas City, Missouri, Clinton got 55.60% at the polls, and 70.59% of the absentee ballots. In Hamilton County, Ohio, Clinton got 57.60% at the polls, and 68.17% of the absentee ballots. In Cuyahoga County, Ohio, Clinton got 59.82% at the polls, and 73.02% of the absentee ballots. In Pima County, Arizona, Clinton got 42.56% at the polls, and 59.41% among early voters.
107. Were these numbers earned, or were they not? The fact that this question must be asked is an indictment of our elections. In many states, elections are not verifiable. We have no way of knowing if the official count is true and correct.
108. When I have used the words "paper ballots marked by voters," I have been referring to ballots that are fed through an optical scanner. The voter marks a ballot, and the machine records something, and hopefully the vote was counted as cast, and at least there are "paper ballots marked by voters" than can be audited later if necessary. In my opinion, based upon years of experience, it would be better to count the ballots by hand in the first place, because optical scanners can be rigged, as in Clermont County, Ohio (Witness to a Crime, pages 290-308).
109. When I have used the words "voter verified paper trail," I refer to the roll of paper that is supposed to reflect how the voter's choices were recorded by an electronic voting machine. There is no way to know if the voters actually verified their choices before recording their votes, or if the roll of paper shown to the auditor is the same one the voters actually saw. In my opinion, based upon years of experience, it would be better to have the voters mark their own ballots, so that the intent of the voter is clear, without need of verification.
110. Some jurisdictions have hand counted paper ballots. Some jurisdictions have paper ballots marked by voters and fed through optical scanners. Some jurisdictions have electronic voting machines with a "voter verified paper trail." Some jurisdictions have no paper record at all. Some states have early voting, and some do not. Some states have mandatory post-election audits, and some do not. Some states allow citizens to audit the election records, and some do not.

This is not "equal protection of the laws," as required by the Fourteenth Amendment. The right to vote must carry with it the right to have our votes counted as cast. We all must enjoy an equal chance of that happening.

111. The reason why election audits are necessary is that the people do not trust the machines or the people who program them and operate them (Witness to a Crime, pages 269-270). We want to mark our own ballots, and to watch as they are counted. There are still some rural counties (in Maine, New Hampshire, Vermont, Massachusetts, West Virginia, Wisconsin, Kansas, Montana, Idaho, and Alaska) that adhere to the gold standard of trustworthy elections: paper ballots, counted by hand, at the polling place, in full public view, on Election night, no matter how long it takes. There is no reason why this cannot be done at every polling place in the nation, even if it means establishing an Election Day holiday, doing away with early voting, and prohibiting tabulation at central locations. Our elections must be entirely transparent. Nothing else will restore public trust in our elections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this nineteenth day of July, 2016.

Richard Hayes Phillips