

1 ADVOCATES FOR FAITH & FREEDOM

2 Robert H. Tyler (SBN 179572)

3 btyler@faith-freedom.com

4 Julianne E. Fleischer (SBN 337006)

5 jfleischer@faith-freedom.com

6 25026 Las Brisas Road

7 Murrieta, California 92562

8 Telephone: (951) 600.2733

9 Facsimile: (951) 600.4996

10 TYLER LAW, LLP

11 Emma F. Plotnik (SBN 341718)

12 eplotnik@tylerlawllp.com

13 25026 Las Brisas Road

14 Murrieta, California 92562

15 Telephone: (951) 600.2733

16 Facsimile: (951) 600.4996

17 Attorneys for Petitioners Election Integrity Project California,
18 Inc., et al.

19 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

20 **FOR THE COUNTY SACRAMENTO**

21 ELECTION INTEGRITY PROJECT
22 CALIFORNIA, INC.; LARRY LEWIS, an
23 individual; COLETTE CASEY, an individual;
24 ELLEN SWENSEN, an individual; THOMAS
25 D. PAVICH an individual; and CHARLES
26 SHINN, an individual,

27 Petitioners,

28 v.

29 SHIRLEY WEBER, CALIFORNIA
30 SECRETARY OF STATE; BOB PAGE,
31 ORANGE COUNTY REGISTRAR OF
32 VOTERS; DEAN LOGAN, LOS ANGELES
33 COUNTY REGISTRAR-
34 RECORDER/COUNTY CLERK; ART
35 TINOCO, RIVERSIDE COUNTY
36 REGISTRAR OF VOTERS; AIMEE X.
37 EXPINOZA, KERN COUNTY AUDITOR-
38 CONTROLLER-COUNTY CLERK; and
39 MICHELLE BALDWIN, TULARE COUNTY
40 REGISTRAR OF VOTERS,

41 Respondents,

Case No.:

**DECLARATION OF CARL KNOWLES
IN SUPPORT OF VERIFIED
PEREMPTORY PETITION FOR WRIT
OF MANDATE**

PRIORITY ELECTION MATTER
(Cal. Elec. Code § 13314)

ACTION REQUIRED BY:
November 6, 2024

42 I, Carl Knowles, the undersigned, declare as follows:

1 1. I am over the age of eighteen years and am not a party to the above-referenced action.
2 I make this declaration based on my own firsthand knowledge unless stated otherwise. If called to
3 testify as a witness, I could and would competently testify.

4 2. I make this declaration in support of Petitioners' Verified Peremptory Writ of
5 Mandate.

6 3. I am a resident of Fresno County and of California who is eligible to vote. I voted in
7 the November 2022 General Election as a resident of Fresno County, and I plan to vote in the
8 upcoming November 2024 General Election.

9 4. I graduated in 1982 from what at that time was named Chapman College, with a
10 degree in Bachelor of Science in Computer Science. After graduation I worked in the field of
11 computer science and information systems technology. Initially as a programmer and maintenance
12 technician, then as an assistant manager and then manager for more than 14 years. After that I
13 worked as a systems engineer on Voice over IP ("VoIP") projects until I retired in 2005. After
14 retirement I began using the skills I learned as a volunteer with election integrity groups first at the
15 county level and then at the state level with Petitioner Election Integrity Project California
16 ("EIPCa"), to create databases of voter rolls and voting histories from files requested from the
17 Secretary of State. Then working with volunteer data analysts, I would create reports from the
18 databases using the Standard Query Language ("SQL") for the analysts to review and reduce the
19 raw data to meaningful numbers for the findings reports they created. This is a back-and-forth
20 environment where the analysts would identify additional requests for new or modified reports from
21 the data to enhance their work.

22 5. I am currently volunteering with Petitioner EIPCa as a part of the Data Analysis
23 Group ("DAG") comprised of database administrators, programmers and analysts. DAG is also
24 responsible, in part, for requesting election data from the Secretary of States's ("SOS") Election
25 Office, securely storing the data received from the SOS, creating the databases, querying the data
26 and producing the reports for the analysts. In this role, I have personally communicated with the
27 data analysts in the Election Office, asking questions about data structures, providing feedback
28 concerning issues with the data files they created.

1 6. I have volunteered with EIPCa in total for roughly 7 years. As a member of the EIPCa
2 DAG team, I am constantly reviewing the provided data for errors and consistency, ensuring that
3 the reports extracted from the database accurately reflect the contents of the database and presented
4 in a manner easy for the analysts to understand and comprehend. A typical database report illustrates
5 the connections between voters, their voting history, and previous databases by either extracting
6 voter information and their voting records or by compiling voters from the database who share
7 similar data values. When referring to data related to the November 2022 General Election, I am
8 using the data files provided by the SOS on June 28, 2024, and not the Statement of Vote issued by
9 the SOS unless I explicitly state otherwise.

10 7. I was personally responsible for ensuring the data files requested from the SOS for
11 the November 2022 General Election met the requirements stated in the "APPLICATION:
12 CALIFORNIA VOTER REGISTRATION FILE REQUEST" dated February 27, 2024, with the
13 standard \$100.00 fee paid by EIPCa.

14 8. Between April 12, 2024, and May 29, 2024, I obtained four data sets that the SOS
15 Election Office created upon request, which did not meet the requirements requested by EIPCa.
16 Each time I contacted the SOS Election Office either by phone or email identifying why the most
17 recent voter registration or voting history file did not meet the requested requirements. A true and
18 correct copy of the email correspondence I exchanged with the Secretary of State's office is attached
19 hereto as **Exhibit 9**.

20 9. The data set created by the SOS Election Office on June 28, 2024, consisted of over
21 34 million registered voters and more than 11 million voting history records specifically for the
22 November 2022 General Election, met the requirements specified in the application. Each voter
23 registration record is comprised of 56 columns containing such information as the voter's name,
24 address, phone number, party preference, date of birth, registration date, status, and voter
25 identification number, just to name a few. And each voting history record is comprised of 8 columns
26 containing information such as the voter ID, County Code, election date, and election type as well
27 as the method the voter used to cast their ballot. It does not contain any information on how they
28 marked their ballot. The sheer amount of data requires EIPCa to have its own servers to manage and

1 store the databases and provide for shared access to the DAG programmers, as it cannot reasonably
2 be accomplished on a typical standalone computer.

3 10. I have personally executed the SQL queries to compile the November 2022 General
4 Election data in various ways for review by EIPCa analysts, including EIPCa Chief Data Analyst
5 Ellen Swensen. When certain data is requested, such as how many voters voted in the November
6 2022 General Election according to the data, I query the data to compile that information for Ms.
7 Swensen to analyze. My work does not involve trying to make sense of the data or trying to figure
8 out what causes discrepancies between different data sets. My job is simply to find and organize and
9 present the requested data in an accurate, manageable, and understandable way. This is common
10 practice when working with large sets of data because the sheer volume of data is overwhelming
11 and unintelligible to humans.

12 11. When compiling the information, the underlying data set is identical to the data
13 contained in the files created by the SOS Election Office and is not changed by my queriers. Rather,
14 I use queries to find and copy the desired data into a new table for sharing with the analysts. In other
15 words, all work that was done by me or other members of the EIPCa DAG Team can easily be
16 verified with the original data set. Any supporting data contained in any of the final reports sent to
17 the SOS will contain the actual information originally provided by the SOS Election Office. The
18 voting history file received from the Secretary of State shows only the ballots that were actually
19 counted in the election and there is no voting history for any ballots that were not counted—such as
20 ballots that had been rejected. The voter information file contained Registration ID numbers, names,
21 addresses, birthdates, precinct numbers, current status (active, inactive, cancelled, etc.) of all persons
22 who were in the registration files as of June 28, 2024. I uploaded these files and merged them
23 together externally using the Registration ID as the matching variable to yield just the voter
24 information of those who had voted and their voting method in November 2022. I verified that the
25 Secretary of State’s June 28, 2024, voter registration file contained the active, inactive, and
26 cancelled voters and that the voting history file contained only the November 2022 General Election
27 voting histories.

12. In querying the data set provided to EIPCa by the Secretary of State, the DAG team and I discovered an issue with the “County Code” in the voting history file. When the voter moves to a different county, the “County Code” in the vote history is changed to the new county. By querying the data and providing actual examples of this anomaly to the SOS, EIPCa was able to make the Secretary of State’s office aware of this issue. The impact of the County Code changing prevents the vote history data from being used to accurately audit any election because the vote tallies no longer match the vote tallies on the Statement of Vote used by the SOS to certify an election.

13. I used standard methods in the industry to query, compile, and check the accuracy of the data. The DAG team and I also take precautions and do testing to ensure the accuracy of our compilations. As stated previously, we do not change the underlying data in any way and our findings are readily reproducible by anyone with similar training or education.

14. I helped to query the data set and create accurate compilations that were provided to Ellen Swensen and EIPCa other members of the EIPCa DAG Team, including a compilation that showed how many votes were counted in the November 2022 General Election and how many times an individual voter had more than one vote attributed to him or her along with the other issues discussed above.

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

Executed on Oct 30, 2024, at Kerman, California.

Carl Knowles
Carl Knowles (Oct 30, 2024 13:27 PDT)

Carl Knowles, DECLARANT

EXHIBIT “9”

From: [REDACTED]
To: [REDACTED]
Subject: EIPCa_Carl Knowles email: Question concerning info contained in the VPH data extract
Date: Saturday, October 12, 2024 1:26:41 PM

----- Original Message -----

Subject: Fwd: Question concerning info contained in the VPH data extract
Date: 2024-10-12 08:30
From: [REDACTED]
To: ellenswensen [REDACTED]

----- Forwarded message -----

From: Anderson, Colby [REDACTED]
Date: Tue, Sep 17, 2024 at 3:34 PM
Subject: RE: Question concerning info contained in the VPH data extract
To: Carl Knowles [REDACTED]

Hi Carl,

Thanks for your question. As regards the county code field on the VPH section of the voter file, it does indeed represent the county the voter is currently registered in, and not the county the voter participation history took place in. I have reviewed the original design specifications, and this is indeed functioning as designed.

We are taking a look at updating the file specifications to change this in the future.

Thanks,

Colby Anderson

Elections Analyst

Elections Division

California Secretary of State

Phone: [REDACTED]

Email: [REDACTED]

Email: [REDACTED]

From: Carl Knowles [REDACTED]
Sent: Friday, August 23, 2024 2:57 PM
To: Anderson, Colby [REDACTED]
Subject: Re: Question concerning info contained in the VPH data extract

Caution: External Email Warning: This is an email from an external sender. Do not click any links or attachments unless you have confirmed the sender. Report phishing by using the phishing alert button.

Please find attached a file with the details on the extract files used to create the attached file of Samples of VPH CountyCodes changing.

Thanks for looking into this issue and I look forward to hearing from you and what you found.

Carl

On Thu, Aug 22, 2024 at 4:23 PM Anderson, Colby

[REDACTED]

> Hi Carl,
>
> Sorry for the long delay in response.
>
> The county code is for the current county in which you are registered,
> and will always reflect the most recent county associated with your
> registration. This number is reflected in field 01 on the VRD file.
>
> On the VPH files, county code is also in field position 01. This will
> correspond to the county associated with each instance of Voter
> Participation History and will not update if a voter changes county.
>
> Hopefully this helps with your question. Sorry I missed your earlier
> calls, I'll give you a call tomorrow in case there is any further
> questions or concerns.
>
> Thanks,
>
> Colby Anderson
>
> Elections Analyst
>
> Elections Division
>
> California Secretary of State
>

[REDACTED]
[REDACTED]
[REDACTED]

>
> From: Carl Knowles [REDACTED]
> Sent: Monday, July 29, 2024 10:06 AM
> To: Anderson, Colby [REDACTED]
> Subject: Question concerning info contained in the VPH data extract
>
> Caution: External Email Warning: This is an email from an external
> sender. Do not click any links or attachments unless you have
> confirmed the sender. Report phishing by using the phishing alert
> button.
>
> Good morning Colby, I have a question concerning the CountyCode field
> in the VPH file.
>
> If I go to 'voterstatus.sos.ca.gov [1]' I can look up the elections I

> participated in going back to 2016 and see the county where I voted.
> The information on the website is correct.
>
> However, if I move to another county within the state of California,
> ALL my records in the VPH file now contain the countycode I moved to
> instead of the original countycode where each ballot was cast.
>
> Why is that?
>
> The information on the SOS webpage reflects the correct county for
> each ballot cast but the VPH file does not.
>
> This is important to the research we perform and obviously the state
> database has this information as shown by the webpage results.
>
> I would like to know how to request a VPH file with the countycode
> that correctly reflects where each ballot was actually cast and not
> the county where the voter currently resides?
>
> If you have any questions for me I can be reached at
>
> 
>
> Thanks
>
> Carl Knowles

Links:

[1] <http://voterstatus.sos.ca.gov>

From: [REDACTED]
To: [REDACTED]
Subject: EIPCa_Carl Knowles email: Contents of the 2019 FTP file I downloaded this weekend
Date: Saturday, October 12, 2024 1:23:04 PM
Attachments: [EIPCa_CA SOS Data Purchase Letter_Final_2.27.2024.docx](#)

----- Original Message -----

Subject: Fwd: Contents of the 2019 FTP file I downloaded this weekend
Date: 2024-10-12 08:20
From: Carl Knowles [REDACTED]
To: ellenswensen [REDACTED]

----- Forwarded message -----

From: Carl Knowles [REDACTED]
Date: Mon, Apr 15, 2024 at 6:39 PM
Subject: Contents of the 2019 FTP file I downloaded this weekend
To: Arroyo, Maggie <marroyo@sos.ca.gov>

Good morning Maggie,

When I decrypted the zip file and loaded the pvr and phd files into our database I realized that we did not receive the data that we requested and paid the extra money for.

The following was extracted from the letter that was submitted with the APPLICATION: CALIFORNIA VOTER REGISTRATION FILE REQUEST that explains in greater detail exactly what we requested and paid extra for.

"Pursuant to California Elections Code § 2191, this letter requests a statewide "voter list or file", by precinct, of all persons who voted in California in the November 8, 2022 federal general election.

The voter list/file should include the names, addresses, birthdates and state registrant ID numbers, as well as, the voting method used in the election and the current status of each listed registrant ("active" status, "inactive" status, as well as, "cancelled", "pending", etc.).

EIPCa's completed application together with attachments is included, as well as, EIPCa's check in the amount of \$100.00."

I will call in the morning to discuss with you how we can get this request completed.

Thanks Carl

Dec Knowles ISO

Final Audit Report

2024-10-30

Created:	2024-10-30
By:	Susan Kenney (skenney@tylerlawllp.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAc1QJuvp0PQhq66PyEs6JkSLvwT3fQGwP

"Dec Knowles ISO" History

-  Document created by Susan Kenney (skenney@tylerlawllp.com)
2024-10-30 - 7:30:14 PM GMT
-  Document emailed to Carl Knowles (cdknowles1@gmail.com) for signature
2024-10-30 - 7:30:21 PM GMT
-  Email viewed by Carl Knowles (cdknowles1@gmail.com)
2024-10-30 - 8:19:19 PM GMT
-  Document e-signed by Carl Knowles (cdknowles1@gmail.com)
Signature Date: 2024-10-30 - 8:27:47 PM GMT - Time Source: server
-  Agreement completed.
2024-10-30 - 8:27:47 PM GMT