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ELECTRONICALLY FILED
Superior Court of California
County of Sacramento
11/14/2024
By: L. Baldwin Deputy

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **FOR THE COUNTY SACRAMENTO**

15 ELECTION INTEGRITY PROJECT
16 CALIFORNIA, INC.; LARRY LEWIS, an
17 individual; COLETTE CASEY, an individual;
18 ELLEN SWENSEN, an individual; THOMAS
19 D. PAVICH an individual; and CHARLES
20 SHINN, an individual,

21 Petitioners,

22 v.

23 SHIRLEY WEBER, CALIFORNIA
24 SECRETARY OF STATE; BOB PAGE,
25 ORANGE COUNTY REGISTRAR OF
26 VOTERS; DEAN LOGAN, LOS ANGELES
27 COUNTY REGISTRAR-
28 RECORDER/COUNTY CLERK; ART
TINOCO, RIVERSIDE COUNTY
REGISTRAR OF VOTERS; AIMEE X.
EXPINOZA, KERN COUNTY AUDITOR-
CONTROLLER-COUNTY CLERK; and
MICHELLE BALDWIN, TULARE COUNTY
REGISTRAR OF VOTERS,

Respondents,

Case No.: 24WM000168

**AMENDED DECLARATION OF DALE
SINOR IN SUPPORT OF VERIFIED
PEREMPTORY PETITION FOR WRIT
OF MANDATE**

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

ACTION REQUIRED BY:
November 5, 2024

28 I, Dale Sinor, 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 San Luis Obispo County in the State of California who is eligible
7 to vote. I voted in the November 2022 General Election as a resident of San Luis Obispo County,
8 and I plan to vote in the upcoming November 2024 General Election. I graduated in 1972 from
9 UCLA. I have been a full-time employee of Oracle, Inc. since 2000.

10 4. One of my primary duties over the past 24 years has been writing SQL queries. I
11 have volunteered with the Election Integrity Project of California, Inc. ("EIPCa") for 8 years. My
12 role involves creating databases of voter rolls and voting histories files requested from the Secretary
13 of State. Then working with volunteer data analysts, I would create reports from the databases using
14 the Standard Query Language ("SQL") for the analysts to review and reduce the raw data to
15 meaningful numbers for the findings reports they created. This is a back-and-forth environment
16 where the analysts would identify additional requests for new or modified reports from the data to
17 enhance their work.

18 5. I am currently volunteering with Petitioner EIPCa as a part of the Data Analysis
19 Group ("DAG") comprised of database administrators, programmers and analysts. DAG is also
20 responsible, in part, for requesting election data from the Secretary of State's ("SOS") Election
21 Office, securely storing the data received from the SOS, creating the databases, querying the data
22 and producing the reports for the analysts.

23 6. I currently serve as a Lead Programmer for DAG. As a member of the EIPCa DAG
24 team, I am constantly reviewing the provided data for errors and consistency, ensuring that the
25 reports extracted from the database accurately reflect the contents of the database and presented in
26 a manner easy for the analysts to understand and comprehend. A typical database report shows
27 relationships between voters, their voting history and prior databases by merging the voters with
28 their voting history or compiling voters from the database that share common data values. When

1 referring to data related to the November 2022 General Election, I am using the data files provided
2 by the SOS on June 28, 2024, and not the Statement of Vote issued by the SOS unless I explicitly
3 state otherwise.

4 7. The data set created by the SOS Election Office on June 28, 2024, consisted of over
5 34 million registered voters and more than 11 million voting history records specifically for the
6 November 2022 General Election, met the requirements specified in the application. Each voter
7 registration record is comprised of 56 columns containing such information as the voter's address,
8 phone number, party preference, date of birth, registration date, status, and voter identification
9 number, just to name a few. And each voting history record is comprised of 8 columns containing
10 information such as the voter ID, County Code, election date and election type as well as the
11 method the voter used to cast their ballot. It does not contain any information on how they marked
12 their ballot. The sheer amount of data requires EIPCa to have its own servers to manage and store
13 the databases and provide for shared access to the data, as it cannot reasonably be accomplished on
14 a typical standalone computer.

15 8. I have personally compiled the November 2022 General Election data for review by
16 EIPCa analysts, including Ellen Swensen and Carl Knowles. When certain data is requested, such
17 as how many voters voted in the November General Election according to the data, I query the data
18 to compile that information to provide an answer. My work does not involve trying to make sense
19 of the data or trying to figure out what causes' discrepancies between different data sets. My job is
20 simply to find and organize the requested data in a manageable and understandable This is common
21 practice when working with large sets of data because the sheer volume of data is overwhelming
22 and unintelligible to humans.

23 9. When compiling the information, the underlying data set is identical to the data
24 contained in the files created by the SOS Election Office and is not changed by my queriers. Rather,
25 I use queries to find and copy the desired data into a new table for sharing with the analysts. In other
26 words, all work that was done by me or other members of the EIPCa DAG Team can easily be
27 verified with the original data set. Any supporting data contained in any final reports sent to the SOS
28 will contain the actual information originally provided by the SOS Election Office. The voting

1 history file received from the Secretary of State shows only the ballots that were actually counted
2 in the election and there is no voting history for any ballots that were not counted—such as ballots
3 that had been rejected. The voter information file contained Registration ID numbers, names,
4 addresses, birthdates, precinct numbers, current status (active, inactive, cancelled, etc.) of all persons
5 who were in the registration files as of June 28, 2024. I, along with my colleague, Carl Knowles,
6 uploaded these files and merged them together using the Registration ID as the matching variable
7 to yield just the voter information of those who had voted and their voting method in November
8 2022. I understand from my communications with the DAG team that the data EIPCa obtained in
9 June of 2024 also reflects active, inactive, and cancelled voters, and to my knowledge, should have
10 served as a “snapshot” in time of the November 2022 Certified Accounting data. The data also
11 encompassed all voters registered to vote in the State of California in November of 2022. However,
12 I, and the DAG team, through our audit, could determine the number of voters who actually voted
13 in the November 2022 election.

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

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

26 12. I helped to query the data set and create accurate compilations that were provided to
27 Ellen Swensen and EIPCa other members of the EIPCa DAG Team, including a compilation that
28 showed how many votes were counted in the November 2022 General Election and how many times

1 an individual voter had more than one vote attributed to him or her along with the other issues
2 discussed above.

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

5 Executed on October 30, 2024, at Benita Springs, Florida.

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7 
Dale Sinor (Oct 30, 2024 12:13 PDT)
8 Dale Sinor, DECLARANT

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