

From: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Sent: Friday, August 05, 2022 3:46 PM EDT
To: AO Records <records@americanoversight.org>
CC: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Subject: RE: Public Information Request (TX-SOS-21-1682) PIR 21-1124
Attachment(s): "8.5.22 Documents.zip"

EXTERNAL SENDER

Good afternoon,

Consistent with our July 8 email, please see the attached documents responsive to your January 24 clarified request for information under Chapter 552 of the Texas Government Code.

The responsive documents contain email addresses of the general public. An email address of a member of the public is confidential under section 552.137 of the Texas Government Code. The attorney general authorized all governmental bodies to withhold an email address of a member of the public without first requesting an attorney general opinion in Open Records Decision No. 684 (2009). Thus, this information has been redacted.

We appreciate your patience as we continue to process your request in accordance with the terms of the PIA. We require additional time to review our records and produce additional responsive documents. We will provide you additional responsive documents on a rolling basis—to the extent such information is not excepted from disclosure under state or federal law—with our next production by 5:00 p.m. on August 26, 2022. *See* Tex. Gov't Code § 552.221(d).

Kind regards,

Jennifer Williams
Legal Assistant to the General Counsel

From: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Sent: Friday, July 8, 2022 4:34 PM
To: 'AO Records' <records@americanoversight.org>
Cc: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Subject: RE: Public Information Request (TX-SOS-21-1682) PIR 21-1124

Good afternoon,

Consistent with our June 10 email, please see the attached documents responsive to your January 24 clarified request for information under Chapter 552 of the Texas Government Code.

The responsive documents contain email addresses of the general public. An email address of a member of the public is confidential under section 552.137 of the Texas Government Code. The attorney general authorized all governmental bodies to withhold an email address of a member of the public without first requesting an attorney general opinion in Open Records Decision No. 684 (2009). Thus, this information has been redacted.

We appreciate your patience as we continue to process your request in accordance with the terms of the PIA. We require additional time to review our records and produce additional responsive documents. We will provide you additional responsive documents on a rolling basis—to the extent such information is not excepted from disclosure under state or federal law—with our next production by 5:00 p.m. on August 5, 2022. *See* Tex. Gov't Code § 552.221(d).

Kind regards,

Jennifer Williams
Legal Assistant to the General Counsel

From: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Sent: Friday, June 10, 2022 4:13 PM
To: 'AO Records' <records@americanoversight.org>
Cc: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Subject: RE: Public Information Request (TX-SOS-21-1682) PIR 21-1124

Good afternoon,

Consistent with our June 3 email, please see the attached zipped folder containing documents responsive to your January 24 clarified request for information under Chapter 552 of the Texas Government Code.

The responsive documents contain email addresses of the general public. An email address of a member of the public is confidential under section

552.137 of the Texas Government Code. The attorney general authorized all governmental bodies to withhold an email address of a member of the public without first requesting an attorney general opinion in Open Records Decision No. 684 (2009). Thus, this information has been redacted.

We appreciate your patience as we continue to process your request in accordance with the terms of the PIA. We require additional time to review our records and produce additional responsive documents. We will provide you additional responsive documents on a rolling basis—to the extent such information is not excepted from disclosure under state or federal law—with our next production by 5:00 p.m. on July 8, 2022. *See* Tex. Gov't Code § 552.221(d).

Kind regards,

Jennifer Williams
Legal Assistant to the General Counsel
Office of the Texas Secretary of State

From: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Sent: Friday, June 3, 2022 3:57 PM
To: 'AO Records' <records@americanoversight.org>
Cc: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Subject: RE: Public Information Request (TX-SOS-21-1682) PIR 21-1124 (1 of 2)

Good afternoon,

Consistent with our May 6 email, please see the attached zipped folder containing documents responsive to your January 24 clarified request for information under Chapter 552 of the Texas Government Code. Due to file sizes, an additional email with zipped folder will follow.

The responsive documents contain email addresses of the general public. An email address of a member of the public is confidential under section 552.137 of the Texas Government Code. The attorney general authorized all governmental bodies to withhold an email address of a member of the public without first requesting an attorney general opinion in Open Records Decision No. 684 (2009). Thus, this information has been redacted.

We appreciate your patience as we continue to process your request in accordance with the terms of the PIA. We require additional time to review our records and produce additional responsive documents. We will provide you additional responsive documents on a rolling basis—to the extent such information is not excepted from disclosure under state or federal law—with our next production by 5:00 p.m. on June 10, 2022. *See* Tex. Gov't Code § 552.221(d).

Kind regards,

Jennifer Williams
Legal Assistant to the General Counsel
Office of the Texas Secretary of State

From: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Sent: Friday, May 6, 2022 3:58 PM
To: 'AO Records' <records@americanoversight.org>
Cc: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Subject: RE: Public Information Request (TX-SOS-21-1682) PIR 21-1124

Good afternoon,

Regarding our April 8 email, we appreciate your patience as we continue to process your request in accordance with the terms of the PIA. We require additional time to review our records and produce additional responsive documents. We will provide you additional responsive documents on a rolling basis—to the extent such information is not excepted from disclosure under state or federal law—with our next production by 5:00 p.m. on June 3, 2022. *See* Tex. Gov't Code § 552.221(d).

Kind regards,

Jennifer Williams
Legal Assistant to the General Counsel
Office of the Texas Secretary of State

From: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Sent: Friday, April 8, 2022 3:55 PM

To: 'AO Records' <records@americanoversight.org>
Cc: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Subject: RE: Public Information Request (TX-SOS-21-1682) PIR 21-1124

Good afternoon,

Regarding our March 4 email, please see the attached zipped folder containing documents responsive to your January 24 clarified request for information under Chapter 552 of the Texas Government Code.

The responsive documents contain email addresses of the general public. An email address of a member of the public is confidential under section 552.137 of the Texas Government Code. The attorney general authorized all governmental bodies to withhold an email address of a member of the public without first requesting an attorney general opinion in Open Records Decision No. 684 (2009). Thus, this information has been redacted.

We appreciate your patience as we continue to process your request in accordance with the terms of the PIA. We require additional time to review our records and produce additional responsive documents. We will provide you additional responsive documents on a rolling basis—to the extent such information is not excepted from disclosure under state or federal law—with our next production by 5:00 p.m. on May 6, 2022. *See* Tex. Gov't Code § 552.221(d).

Kind regards,

Jennifer Williams
Legal Assistant to the General Counsel
Office of the Texas Secretary of State

From: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Sent: Friday, March 4, 2022 1:40 PM
To: 'AO Records' <records@americanoversight.org>
Cc: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Subject: RE: Public Information Request (TX-SOS-21-1682) PIR 21-1124

Good afternoon,

We appreciate your patience as we continue to process your clarified request in accordance with the terms of the PIA. We require additional time to review our records and produce additional responsive documents. We will provide you any additional responsive documents—to the extent such information is not excepted from disclosure under state or federal law—by 5:00 p.m. on April 8, 2022. *See* Tex. Gov't Code § 552.221(d).

Kind regards,

Jennifer Williams
Legal Assistant to the General Counsel
Office of the Texas Secretary of State

From: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Sent: Monday, February 7, 2022 3:36 PM
To: 'AO Records' <records@americanoversight.org>
Cc: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Subject: RE: Public Information Request (TX-SOS-21-1682) PIR 21-1124

Good afternoon,

This email responds to your request for information under Chapter 552 of the Texas Government Code (the "PIA"). We are processing your request in accordance with the terms of the PIA. We require additional time to review our records and produce responsive documents. We will provide you any responsive documents—to the extent such information is not excepted from disclosure under state or federal law—by 5:00 p.m. on March 4, 2022. *See* Tex. Gov't Code § 552.221(d).

Kind regards,

Jennifer Williams
Legal Assistant to the General Counsel
Office of the Texas Secretary of State

From: GeneralCounsel
Sent: Wednesday, January 26, 2022 1:57 PM
To: 'AO Records' <records@americanoversight.org>
Subject: RE: Public Information Request (TX-SOS-21-1682) PIR 21-1124

Thank you for contacting the Office of the Texas Secretary of State. This email acknowledges receipt of your clarified request for information under the Public Information Act, and we will process it in accordance with Chapter 552 of the Texas Government Code.

We will let you know if we have any questions or need clarification.

Regards,

Office of the Texas Secretary of State

From: AO Records <records@americanoversight.org>
Sent: Monday, January 24, 2022 1:56 PM
To: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Subject: Re: Public Information Request (TX-SOS-21-1682)

CAUTION: This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to informationsecurity@sos.texas.gov.

CAUTION: This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to informationsecurity@sos.texas.gov.

Good afternoon,

Thank you for reaching out for clarification regarding this request. In response to your inquiries, American Oversight states:

1. American Oversight seeks both formal complaints submitted under Section 31.006 of the Texas Elections Code, and any other reports or complaints submitted to your office by the described individuals. The reports and complaints described in the records request encompass correspondence sent to your office by email, text, or other forms of communication by which a report or complaint may be made. If you have further questions regarding this portion of the request, please let me know.
2. American Oversight only seeks the underlying complaints and records sufficient to identify the final status or disposition of each report or complaint. To the extent that this information would be kept in a final disposition letter, a spreadsheet, or other form, those records would be sufficient to satisfy the request. If a final determination regarding a complaint was made in an internal communication and not recorded elsewhere, then that communication would be responsive to this request. Please let me know if this explanation is unclear.
3. American Oversight can agree to narrow this request to communications from individuals communicating from any email address ending in @tarrantcounty.com or those identifying themselves as a poll watcher or other appointing authority.

Best,

Emma Lewis
Counsel
American Oversight

From: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Date: Monday, December 13, 2021 at 3:11 PM
To: AO Records <records@americanoversight.org>
Cc: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Subject: RE: Public Information Request (TX-SOS-21-1682)

EXTERNAL SENDER

Good afternoon,

Please see the attached letter in response to your request for information under Chapter 552 of the Texas Government Code.

Kind regards,

Jennifer Williams
Legal Assistant to the General Counsel
Office of the Texas Secretary of State

From: AO Records <records@americanoversight.org>

Sent: Tuesday, November 23, 2021 5:36 PM
To: GeneralCounsel <GeneralCounsel@sos.texas.gov>
Subject: Public Information Request (TX-SOS-21-1682)

CAUTION: This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to informationsecurity@sos.texas.gov.

Dear Public Information Officer:

Please find attached a request for records under the Texas Public Information Act.

Sincerely,

--

Sarah Wishingrad

Pronouns: she/her

Paralegal

American Oversight

records@americanoversight.org

www.americanoversight.org | @weareoversight

PIR: TX-SOS-21-1682

From: Elections Internet
Sent: Tuesday, August 24, 2021 3:43 PM
To: [REDACTED]
Subject: Complaint Response
Attachments: Doris Hart.pdf

Thank you for contacting the Elections Division of the Office of the Texas Secretary of State.

Attached is a response to your complaint that was submitted to our office regarding your concerns about possible voter suppression in Tarrant County back in 2016.

Again, thank you for contacting our office. If you have any additional questions or if we can be of further assistance, please contact our office at 1.800.252.8386 or email us at Elections@sos.texas.gov.

Elections Division

Office of the Secretary of State
800-252-VOTE(8683)

www.sos.state.tx.us/elections/index.shtml

For Voter Related Information, please visit:



The information contained in this email is intended to provide advice and assistance in election matters per §31.004 of the Texas Election Code. It is not intended to serve as legal advice for any matter. Please review the law yourself, and consult with an attorney when your legal rights are involved.

The State of Texas



Elections Division
P.O. Box 12060
Austin, Texas 78711-2060
www.sos.state.tx.us

Phone: 512-463-5650
Fax: 512-475-2811
Dial 7-1-1 For Relay Services
(800) 252-VOTE (8683)

Secretary of State

August 24, 2021

Doris Hart
2614 Jessup Trail
Arlington, Texas 76006
[REDACTED]

Dear Ms. Hart,

This letter is in response to the complaint you submitted to our office regarding possible voter suppression in Tarrant County back in 2016.

The Office of the Texas Secretary of State does not have any authority to investigate allegations of criminal conduct. However, if our office receives a complaint that provides reasonable cause to suspect that alleged criminal conduct occurred in connection to an election, our office is required to refer the complaint to the Texas Attorney General for investigation. Tex. Elec. Code § 31.006 (2015).

Our office has reviewed each of your concerns, but none of the facts that you have presented to us in your complaint appear to involve criminal matters under the election code. Therefore, our office is not referring this matter to the Texas Attorney General for investigation. If you have additional information that was not included in your complaint that demonstrates that criminal conduct may have occurred, please send it to us for further review.

If you have any further questions, please do not hesitate to contact the Elections Division toll-free at 1-800-252-(VOTE) 8683.

Sincerely,

A handwritten signature in blue ink, appearing to read "Keith Ingram".

Keith Ingram
Director of Elections

KI:TS

From: Elections Internet
Sent: Friday, November 20, 2020 2:45 PM
To: [REDACTED]
Subject: Complaint Response
Attachments: Trudy Julius.pdf

Sensitivity: Personal

Thank you for contacting the Elections Division of the Office of the Texas Secretary of State.

Attached is a response to your complaint that was submitted to our office regarding your concerns regarding the Tarrant County Signature Verification Committee and their processes for verifying signatures accurately.

Again, thank you for contacting our office. If you have any additional questions or if we can be of further assistance, please contact our office at 1.800.252.8386 or email us at Elections@sos.texas.gov.

Elections Division

Office of the Secretary of State
800-252-VOTE(8683)

www.sos.state.tx.us/elections/index.shtml

For Voter Related Information, please visit:



The information contained in this email is intended to provide advice and assistance in election matters per §31.004 of the Texas Election Code. It is not intended to serve as legal advice for any matter. Please review the law yourself, and consult with an attorney when your legal rights are involved.

The State of Texas



Elections Division
P.O. Box 12060
Austin, Texas 78711-2060
www.sos.state.tx.us

Phone: 512-463-5650
Fax: 512-475-2811
Dial 7-1-1 For Relay Services
(800) 252-VOTE (8683)

Ruth R. Hughs
Secretary of State

November 19, 2020

Trudy Julius
1428 Beckwith Drive
Arlington, Texas 76018
[REDACTED]

Dear Ms. Julius,

This letter is in response to your election complaint regarding the Tarrant County Signature Verification Committee.

The Office of the Texas Secretary of State does not have any authority to investigate allegations of criminal conduct. However, if our office receives a complaint that provides reasonable cause to suspect that alleged criminal conduct occurred in connection to an election, our office is required to refer the complaint to the Texas Attorney General for investigation. Tex. Elec. Code § 31.006 (2015).

Our office has reviewed each of your concerns, but none of the facts that you have presented to us in your complaint appear to involve criminal matters under the election code. Therefore, our office is not referring this matter to the Texas Attorney General for investigation. If you have additional information that was not included in your complaint that demonstrates that criminal conduct may have occurred, please send it to us for further review.

If you have any further questions, please do not hesitate to contact the Elections Division toll-free at 1-800-252-(VOTE) 8683.

Sincerely,

A handwritten signature in blue ink, appearing to read "Keith Ingram".

Keith Ingram
Director of Elections

KI:TS

From: Agency Constituent Responses <agency_constituent_responses@gov.texas.gov>
Sent: Friday, December 18, 2020 5:22 PM
To: Elections Internet
Subject: Constituent Referrals
Attachments: O-CatesPamela202012160277.pdf; CatesPamela202012140501.pdf; O-BirdwellDavid202012160482.pdf; BirdwellDavid202012151025.pdf; O-LebreDoChristopher202012100374.pdf; LebreDoChristopher202012071395.pdf; O-WagnerElaine202012090182.pdf; WagnerElaine202012070809.pdf; O-DuttonDennis202012080125.pdf; DuttonDennis202012070774.pdf

CAUTION: This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to Informationsecurity@sos.texas.gov.

Please find attached constituent referrals to your agency. Thank you in advance for your assistance.

*Constituent Communications Division
Office of the Governor*



GOVERNOR GREG ABBOTT

December 16, 2020

Ms. Pamela L. Cates
[REDACTED]

Dear Ms. Cates:

Thank you for taking the time to contact the Office of the Governor. We understand that you are concerned.

I am asking Secretary of State Ruth Hughs for her staff's assistance in reviewing and responding both to you and to this office on the information you shared.

Please let us know whenever we may be of service in the future.

Sincerely,

A handwritten signature in black ink that reads "Dede Keith".

Dede Keith
Deputy Director
Constituent Communication Division
Office of the Governor

DK:rw

OFFICE OF THE GOVERNOR - WEB MAIL CORRESPONDENCE

Name:

Ms. Pamela L Cates

Correspondence ID:**IP Address:**

99.103.206.251

Incoming Type:

A

Address:

202 Blue Mound Rd E
Haslet
TX
76052

Date Submitted:

12/12/2020 12:29:25PM

Email:

[REDACTED]

Phone:

817-501-5821

Message:

Governor Abbott,

Sidney Powell on Fox Business News with Lou Dobbs said that the election machines in Tarrant County turned my Republic vote for Trump with Biden. I need to know if this is true. If it is true, how are we ever going to have a democracy. Please get back to me on who I could contact to verify this information. I voted for Trump and if my vote was overturned, it seems to me that Texas could be blue before we can do any thing about it.

Who do I call?



GOVERNOR GREG ABBOTT

December 16, 2020

Mr. David Birdwell
[REDACTED]

Dear Mr. Birdwell:

Thank you for taking the time to contact the Office of the Governor. We understand that you are concerned.

I am asking Secretary of State Ruth Hughs for her staff's assistance in reviewing and responding both to you and to this office on the information you shared.

Please let us know whenever we may be of service in the future.

Sincerely,

A handwritten signature in black ink that reads "Dede Keith".

Dede Keith
Deputy Director
Constituent Communication Division
Office of the Governor

DK:rw

OFFICE OF THE GOVERNOR - WEB MAIL CORRESPONDENCE

Name:

Mr. David Birdwell 8538595

Correspondence ID:**IP Address:**

206.248.40.68

Incoming Type:

A

Address:

P.O. Box 1388
Burleson
TX
76097

Date Submitted:

12/14/2020 11:21:13AM

Email:

[REDACTED]

Phone:

4698538595

Message:

Voter fraud on me in Tarrant county

I am 75 years old and have been voting since I was 21. i received a letter stating that my vote was denied because I was not a registered voter. then I receive a form to fill out to become a registered voter.

I have always just presented my license and was allowed to vote. this time they told me that they could not find me. I was given a number in fort worth to call to clear things up. I was told to go back and tell them that I was allowed to vote , after I voted they took my ballet and I had to insert it into a envelope and seal it.



GOVERNOR GREG ABBOTT

December 10, 2020

Mr. Christopher Lebrede
[REDACTED]

Dear Mr. Lebrede:

Thank you for taking the time to contact the Office of the Governor. We understand that you are concerned.

I am asking Secretary of State Ruth Hughs for her staff's assistance in reviewing and responding both to you and to this office on the information you shared.

Please let us know whenever we may be of service in the future.

Sincerely,

A handwritten signature in black ink that reads "Dede Keith".

Dede Keith
Deputy Director
Constituent Communication Division
Office of the Governor

DK:rw

OFFICE OF THE GOVERNOR - WEB MAIL CORRESPONDENCE

Name:

Mr. Christopher D Lebrede SSH

Correspondence ID:

202012071395

IP Address:

12.7.150.2

Address:

5612 Sword Drive
Fort Worth, TX 76137

Date Submitted: 12/3/2020 10:25:26 AM

Email: [REDACTED]

Phone: 18179468810

Message:

Good Morning,

In light of the recent revelations and overwhelming evidence as it pertains to our rigged election system. I would like some answers from the Tarrant County Elections Administrator. He was hired in 2018, and previously worked for Smartmatic for 12 years prior, and received his Engineering Degree from the University of Texas at Dallas. Just so happens that Tarrant County went blue in 2020 for the first time since 1964. What an amazing coincidence! Smartmatic has been used in the Dominion's voting machines twice, in 2013 and again in 2019. Two state offices discovered what they called "multiple hardware vulnerabilities" in Dominion's voting machines, determining that [Dominion's] Democracy Suite 5.5-A system satisfies each of the voting-system requirements set forth in the Texas Election Code. Is there an obvious conflict of interest as it pertains to the ensuring Free and Fair Elections? We essentially hired the person that wrote our constitution, the will of "We The People!" I would like to know what is being done by your office to reaffirm confidence in the Tarrant County Elections Administrator's claims. The evidence is overwhelming. To include his own LinkedIn Profile. I find this matter very disturbing to say the least. We should expect any of your constituents not to feel disenfranchised, and improperly represented. In the United States of America, we should formally resend any expectations that any Elected Official may feel they have over me, or by me. This email and information will be made public. I will also look for resolution through the courts if need be. Sadly, the trust I once had in our election process is gone. I pray you will uphold your promise as a United States Marine my oath to this country and Our Constitution will always be true. I look forward to hearing from you.

Respectfully Submitted, Semper Fi
Christopher D. Lebrede

TARRANT COUNTY

Elections Administrator

Heider Garcia

P.O. Box 961011, Fort Worth, TX 76161

2700 Premier Street, Fort Worth, TX 76111

(817) 831-8683 Phone

(817) 850-2394 FAX

https://www.linkedin.com/in/heidergarcia?challengeId=AQGMI_oP2XCLfAAAAXYo3fOcSR2f1BLKhdnO6Q2ITH6PDUDNKm911439-4d16-83fb-9c7cb39c011d

<https://www.sos.texas.gov/elections/voter/votregduties.shtml#T>



GOVERNOR GREG ABBOTT

December 9, 2020

Ms. Elaine Wagner
9013 Thornway Drive
North Richland Hills, Texas 76182-8637

Dear Ms. Wagner:

Thank you for taking the time to contact the Office of the Governor. We understand that you are concerned.

I am asking Secretary of State Ruth Hughs for her staff's assistance in reviewing and responding both to you and to this office on the information you shared.

Please let us know whenever we may be of service in the future.

Sincerely,

A handwritten signature in black ink that reads "Dede Keith".

Dede Keith
Deputy Director
Constituent Communication Division
Office of the Governor

DK:rw

November 24, 2020

RECEIVED
NOV 30 2020
OOG/CCOM

Wmacle
C. G. S. 5
M. F. Election - (W)

Dear Governor Abbott:

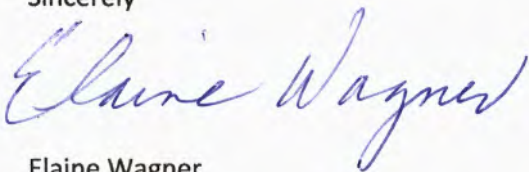
I am writing in response to a letter I received Saturday November 22, 2020 from the Tarrant County Elections Administration. This letter, dated November 16, 2020 stated my vote in the recent election did not count as the signature did not match the signature on the application for ballot by mail. I requested ballot by mail, as I have used for the last five years, signed it and mailed it in. That was my signature. I also signed both the inner and outer envelopes of my ballot and mailed those in.

My signature is very legible and I can not understand how someone could cancel out my vote with a clear conscience!

I have registered a complaint with the Elections Administration and wanted to express my disappointment to your office as well.

My vote is sacrosanct as all legal votes are! I have been disenfranchised in this election. I believe mail in voting is no longer an option for me in upcoming elections.

Sincerely



Elaine Wagner

Elections ID# 446813

9013 Thornway Drive

North Richland Hills, Texas 76182



GOVERNOR GREG ABBOTT

December 8, 2020

Mr. Dennis Dutton
[REDACTED]

Dear Mr. Dutton:

Thank you for taking the time to contact the Office of the Governor. We understand that you are concerned.

I am asking Secretary of State Ruth Hughs for her staff's assistance in reviewing and responding both to you and to this office on the information you shared.

Please let us know whenever we may be of service in the future.

Sincerely,

A handwritten signature in black ink that reads "Dede Keith".

Dede Keith
Deputy Director
Constituent Communication Division
Office of the Governor

DK:rw

OFFICE OF THE GOVERNOR - WEB MAIL CORRESPONDENCE

Name:

Mr. Dennis Dutton 8148100

Correspondence ID:**IP Address:**

107.77.218.170

Incoming Type:

A

Address:

3206 Carmel Valley DRIVE
MISSOURI CITY
TX
77459

Date Submitted:

12/7/2020 6:02:20AM

Email:

[REDACTED]

Phone:

281-814-8100

Message:

I believe the Missouri City runoff election is being conducted illegally.

One (1) polling location is apparently being held open for extended hours.

This seems to violate the "Equal Protection" Clause of the Constitution.

From: Graphic Designer [REDACTED]
Sent: Thursday, October 29, 2020 1:19 AM
To: Elections Internet
Subject: Election Complaint form PDF from a voter in Fort Worth
Attachments: Complaint form.pdf

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Hi nobody in Tarrant County voting responded to my email I sent them on Oct. 22, 2020, so I am going to email you my complaint.

I downloaded your election SOS complaint form from the TEXAS SECRETARY OF STATE website and created a PDF where nobody can edit it.

I hope you receive my complaint since Tarrant County didn't bother to respond after I called them first and then emailed them.

Cindy Hasio

ELECTION COMPLAINT TO THE TEXAS SECRETARY OF STATE

Docket Number

**OFFICE USE
ONLY**Date Hand-delivered or Date Postmarked
/ /

Please read the Important Information at the end of this document. The Secretary of State has no authority to order a new election, change an election result, or conduct a criminal investigation. A complaint filed with this form will not alter the results of an election.

This complaint form MUST BE SIGNED before it is submitted to the Secretary of State; therefore, you must print it out and sign it before mailing or faxing a copy or emailing a scanned, signed copy.

I. IDENTITY OF COMPLAINANT

1 COMPLAINANT NAME	MS / MRS / MR		FIRST		MI	
	Ms Cindy					
2 COMPLAINANT PHYSICAL ADDRESS	NICKNAME		LAST		SUFFIX	
			Hasio			
3 COMPLAINANT MAILING ADDRESS ☒ (check if same as above)	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY		STATE ZIP CODE	
	3717 Byers Avenue		Fort Worth		TX 76107	
4 COMPLAINANT TELEPHONE NUMBER	AREA CODE PHONE NUMBER EXT		5 COMPLAINANT E-MAIL ADDRESS			
	(940) 312-9777					

II. IDENTITY OF RESPONDENT

PERSON OR ENTITY COMMITTING ALLEGED VIOLATION(S)

6 RESPONDENT NAME	MS / MRS / MR		FIRST		MI	
	N/A					
7 RESPONDENT POSITION OR TITLE	NICKNAME		LAST		SUFFIX	
8 RESPONDENT PHYSICAL ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY		STATE ZIP CODE	
	3500 Camp Bowie Blvd		Fort Worth		TX 76107	
9 RESPONDENT MAILING ADDRESS ☒ (check if same as above)	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY		STATE ZIP CODE	
10 RESPONDENT TELEPHONE NUMBER	AREA CODE PHONE NUMBER EXT		11 RESPONDENT E-MAIL ADDRESS (IF KNOWN)			
			N/A			

GO TO PAGE 2

III. NATURE OF ALLEGED VIOLATION**Page2**

If you believe that a criminal violation of the Code has occurred, please state the specific acts committed by the person or entity named in this complaint, along with a reference to the section of the Code alleged to have been violated, if known. If you need more space, please attach a separate sheet.

Unfriendly and discriminatory treatment towards me the voter (I am Asian-American) at UNT Health Science Center at 3500 Camp Bowie Blvd. in Fort Worth, Tx by employee (African-American female) who was hired to take registration and ID for early voting.

ATTACH ADDITIONAL PAGES AS NEEDED

IV. STATEMENT OF FACTS**Page 3**

State the facts constituting the alleged violation(s), including the dates on which or the period of time in which the alleged violation(s) occurred. Identify allegations of fact not personally known to the complainant, but alleged on information and belief. Please use simple, concise, and direct statements.

ELECTION IN WHICH VIOLATION(S) OCCURRED

NAME OF ELECTION EARLY VOTING ELECTION 2020 DATE OF ELECTION 11 / 03 / 20
MM/DD/YYYY

COUNTY OR POLITICAL SUBDIVISION Tarrant County PRECINCT UNT Health Science

I never really had good experiences (Oct. 22, 2020 and in the past in 2012) when I early voted at the UNT Health Science Center at 3500 Camp Bowie Blvd. in Fort Worth, Tx. I live right down the block and I am an Asian-American woman that is also a US Army veteran. I came there on 10/22/2020 around 2 PM. They were not busy and there were 3 people in front of me who were white that were greeted and welcomed. However, when I was next, the female just stared at me and said NOTHING but stuck her hand out expecting me to give her ID or registration. I feel absolutely unwelcome and the people that work there sitting at the front desks that give the numbers are unfriendly. I have NEVER been greeted. This happened the last election too in 2012. I came to vote at the same location and nobody in the front was nice to me. I remembered how I was treated the last 4 years too. Nobody was behind me but two white males and one white female. ALL of them were greeted and told "hello." However, when it was my turn, NOBODY working there greets me or even looks at me because I am Asian and they judge me negatively. They were unfriendly and the employee just stared at me and acted like I wasn't welcomed there at all. The three people that were in line in front of me were greeted but when it was my turn the female working there just gave me a cold hard stare and just stuck her hand out without saying one word to me when I was holding my ID. I found this very rude. Why can't I be treated with respect and dignity too like the white people that were greeted and welcomed? I am always given a cold hard stare and they say NOTHING to me. Nobody was in line behind me and they were not busy. This also happened at the Northwest TCC campus when I voted 2 years ago. Everyone white was greeted and I was ignored. I am sick and tired of being treated as if I were "less than" with no respect or acknowledgement. It is very bad manners. They should greet everyone, especially since they are not busy. I have to complain about this so I can teach people how to treat me and that shouldn't be that way.

It only takes one second to say "hi" and instead I remember how I was treated for the next 4 years. I was hoping they would greet me today on October 22, 2020 but they failed to do that again and succeeded in making me feel absolutely substandard compared to the white voters who were greeted and acknowledge because of their race. It makes me not want to vote next time for how I am treated. The people hired should be respectful to everyone regardless of what they look like or what race they are.

This was another BAD experience with the Tarrant County early voting place at the UNT Health Science Center at 3500 Camp Bowie Blvd. in Fort Worth, Texas. Please train your employees to be respectful to all who make an effort to come in and vote. I will not come back there again to vote in the future. It seems that they dislike Asians like me even though I am an American citizen, lived in Texas for decades and served in the US Army.

They also treated me the same way in 2012 and they just stared at me and said nothing while they greeted all the Caucasian voters in line in front of me. I remembered that for 4 years. I can tell the people hired working at the polls perceive the Caucasian voters as being more valued, which is why they got treated with respect and greeted and I was ignored, stared at and given dirty looks when I spoke up for myself. I stand up for myself when I am mistreated or not treated the same as the other voters of different races.

I hope a supervisor or manager higher up (not from that location) who will respond to my email because I already have had a bad impression of your employees from not saying anything to me.

ATTACH ADDITIONAL PAGES AS NEEDED

V. LISTING OF DOCUMENTS AND OTHER MATERIALS

Page 4

List all documents and other materials filed with this complaint. Additionally, list all other documents and other materials that are relevant to this complaint and that are within your knowledge, including their location, if known.

I called Tarrant County Voting and the receptionist told me to send an email to electionsinfo@tarrantcounty.com.

I wrote them on Oct. 22 and they never responded to me at all.

I sent them another email on Oct. 29, 2020 which said, "Hi, I sent an email on October 22, 2020 (see below). Since nobody bothered to respond to my complaint, I will take the next step up the Chain of Command and write an email to the ELECTION COMPLAINT TO THE TEXAS SECRETARY OF STATE. Hopefully, they will respond or have you respond to me and take action."

ATTACH ADDITIONAL PAGES AS NEEDED

VI. SIGNED STATEMENT

Page 5

I, Cindy Hasio, the undersigned,
PRINTED NAME OF COMPLAINANT
under penalty of perjury do swear or affirm that the information contained in this
complaint is true and correct to the best of my knowledge.

I have read and understand the accompanying instructions, and I am aware that
completion of this form cannot and will not alter the outcome of the election.

SIGNATURE OF COMPLAINANT

**NOTICE: THIS COMPLAINT IS NOT CONFIDENTIAL; ONCE REVIEWED BY
THE SECRETARY OF STATE, IT WILL BE TREATED AS A PUBLIC RECORD.**

PRINT

RESET

REMINDER: YOU MUST SIGN THIS FORM PRIOR TO SUBMITTING**IF MAILING, PLEASE SEND TO:**

Texas Secretary of State
Elections Division
c/o Legal Dept.
P.O. Box 12060
Austin, TX 78711

IF FAXING, PLEASE SEND TO:

512.475.2811

IF EMAILING, PLEASE SEND TO:

elections@sos.texas.gov

VII. IMPORTANT INFORMATION

Pursuant to Section 31.006 of the Texas Election Code (the "Code"), the Office of the Secretary of State (the "Secretary of State") has the ability to refer elections complaints to the Office of the Attorney General (the "Attorney General"). If, after receiving a complaint alleging criminal conduct in connection with an election, the Secretary of State determines that there is reasonable cause to suspect that the alleged criminal conduct occurred, the Secretary of State shall promptly refer the complaint to the Attorney General. The Secretary of State shall deliver to the Attorney General all pertinent documents in the Secretary of State's possession.

Any person who believes that a criminal violation of the Code has occurred may file a complaint. In order to initiate the complaint process, a written and signed complaint must be filed with the Secretary of State. The complaint must allege the violation with particularity, identify the person(s) or entity responsible for the alleged violation, and contain a reference to the section of the Code alleged to have been criminally violated, if known.

The Secretary of State has no authority to order a new election, change an election result, or conduct a criminal investigation. This form is to be used solely to document alleged election irregularities and submit allegations of criminal violations of the Code to be referred to the Attorney General. Often complaints will be Code violations that do not amount to criminal violations or acts. These violations are election irregularities which may form the basis of an election contest, but do not carry a criminal penalty. These election irregularities will not be referred to the Attorney General for possible criminal prosecution.

Challenging an election result can be done either through (1) a recount or (2) an election contest. If you are seeking to alter the outcome of the election, you will need to use one of these methods of challenging the results, described below. **A complaint filed with this form will not alter the results of an election.**

Legal Remedies That May Alter the Election Outcome

1. Recount

Recounts are used only to recount the votes in a particular race (office) or measure. A recount does not have the scope or authority of an election contest in court, i.e., the recount committee will not look at the manner in which voters were qualified to vote in person or by mail or whether voters were eligible to vote in the election. The governing body of an entity cannot conduct a recount on its own motion, e.g., at the canvass.

Please note that recount request deadlines occur soon after the canvass - a recount must be requested not later than two days following the canvass. More information on filing recounts (including form, deposit information, and who and how to file) is available on the Secretary of State's website.

2. Election Contest

If a candidate disputes the outcome of the election, regardless of whether or not a recount has been conducted, and has discovered irregularities, fraud, or mistakes in the conduct of the election that affected or could have affected the outcome, he/she can file an election contest to challenge the election results. The legal question raised by an election contest is whether the outcome of the contested election, as shown by the final canvass, is not (or cannot be conclusively determined to be) the true outcome because (1) illegal votes were counted, or because (2) an election officer or other official administering the election either (i) prevented eligible voters from voting, (ii) failed to count legal votes, (iii) engaged in fraud or illegal conduct, or (iv) erred in some material way.

Contests involving county elections are filed in the district court in the relevant county. In most circumstances, the filing deadline for an election contest is 30 days after the canvass, except in the case of a primary or an election where a runoff is necessary, in which case the deadline for filing is 10 days after the final canvass. If a recount is held and the votes are changed, the date of the canvass of the recount (i.e., final canvass) becomes the new date by which the contest deadline is calculated.

Any losing candidate may contest an election. In a contest of an officer election, the contestant files suit against the election's winner (or in the event that the election outcome is determined by majority vote rather than plurality vote, the person or persons entitled to a place on the runoff ballot). Voters at large within a political subdivision do not possess standing to intervene as parties to an election contest for public office.

In an election contest, the court has the authority to: (1) examine ballots and equipment; (2) compel voters to reveal how they voted; (3) declare an election void if illegal votes are greater than or equal to the number of votes necessary to change the outcome or cannot ascertain the true outcome of the election; (4) order a new election (or new runoff election), if unable to ascertain true outcome; (5) subtract illegal votes, if able to determine the side for which an illegal vote was cast; or (6) declare outcome of election, if able to ascertain true outcome.

If you think either a recount or an election contest is the proper procedure for the remedy you seek, you may wish to consult private legal counsel regarding your legal options. The Secretary of State staff can provide general guidance on these procedures as well.

From: Scott Severance <[REDACTED]>
Sent: Monday, November 23, 2020 12:44 PM
To: Elections Internet
Subject: Election Complaint to the Texas Secretary of State
Attachments: Tarrant_county_complaintform-sos.pdf

CAUTION: This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to Informationsecurity@sos.texas.gov.

Attention: Election Complaint to the Texas Secretary of State

Please find the attached form with regards to the Tarrant County, Texas, 11/3/2020 election results.

Sincerely,

Scott Severance

ELECTION COMPLAINT TO THE TEXAS SECRETARY OF STATE

Docket Number

**OFFICE USE
ONLY**Date Hand-delivered or Date Postmarked
/ /

Please read the Important Information at the end of this document. The Secretary of State has no authority to order a new election, change an election result, or conduct a criminal investigation. A complaint filed with this form will not alter the results of an election.

This complaint form **MUST BE SIGNED** before it is submitted to the Secretary of State; therefore, you must print it out and sign it before mailing or faxing a copy or emailing a scanned, signed copy.

I. IDENTITY OF COMPLAINANT

1 COMPLAINANT NAME	MS / MRS / MR	FIRST	MI
	Mr Scott		A
	NICKNAME	LAST	SUFFIX
	Severance		
2 COMPLAINANT PHYSICAL ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY STATE ZIP CODE
	606 Hollyberry Dr		Mansfield TX 76063
(Full home or business address, including street, city, state, and zip code)			
3 COMPLAINANT MAILING ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY STATE ZIP CODE
	☒ (check if same as above)		
(Full home or business address, including street, city, state, and zip code)			
4 COMPLAINANT TELEPHONE NUMBER	AREA CODE	PHONE NUMBER	EXT
	2142233254		
5 COMPLAINANT E-MAIL ADDRESS			

II. IDENTITY OF RESPONDENT

PERSON OR ENTITY COMMITTING ALLEGED VIOLATION(S)

6 RESPONDENT NAME	MS / MRS / MR	FIRST	MI
	NICKNAME	LAST	SUFFIX
7 RESPONDENT POSITION OR TITLE			
8 RESPONDENT PHYSICAL ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY STATE ZIP CODE
(Full home or business address, including street, city, state, and zip code)			
9 RESPONDENT MAILING ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY STATE ZIP CODE
	☐ (check if same as above)		
(Full home or business address, including street, city, state, and zip code)			
10 RESPONDENT TELEPHONE NUMBER	AREA CODE	PHONE NUMBER	EXT
11 RESPONDENT E-MAIL ADDRESS (IF KNOWN)			

GO TO PAGE 2

III. NATURE OF ALLEGED VIOLATION**Page2**

If you believe that a criminal violation of the Code has occurred, please state the specific acts committed by the person or entity named in this complaint, along with a reference to the section of the Code alleged to have been violated, if known. If you need more space, please attach a separate sheet.

I would like to bring to your attention a statistical anomaly regarding Congressman Wright's November 3, 2020 Tarrant County election loss. I believe the following analysis should warrant a further investigation into the Smartmatic voting systems in Tarrant County by a digital forensic team.

To determine if any anomalies in Congressman Wright's loss to Stephen Daniel by 11,495 votes, and President Trump's loss in the county of 1,826 votes, as reported at <http://access.tarrantcounty.com/content/dam/main/elections/2020/1120/reports/cumulative.pdf>, I performed a ChiSquare test to examine the distribution of absentee, early, and election day votes. The outcome of this test indicated a greater number of absentee votes were assigned to Stephen Daniel (Democrat) than expected under the hypothesis of independence. While this may be legitimate, it warrants a deeper investigation.

Tarrant County Voter Fraud: Calculations

H0: Voting type and candidate are independent.

Ha: Voting type and candidate are not independent.

Reject H0 if $\chi^2 > 13.277$ ($\alpha = 0.01$, $df = 4$)

$\chi^2 = 1146.10$

Conclusion: Sufficient evidence ($p < 0.001$) exists, using a significance level of 0.01, that vote type and candidate are not statistically independent. Reason: A greater number of absentee votes were assigned to Stephen Daniel (Democrat) than expected under the hypothesis of independence.

Furthermore, when evaluating the change log recorded from these machines by NYT API, and subsequently captured in this repo, <https://github.com/alex/nyt-2020-election-scraper>, we see Tarrant County sent updates on the following times:

11/6/2020 4:10:40 AM

11/6/2020 4:14:00 AM

11/7/2020 2:51:06 AM

11/10/2020 1:56:53 AM

11/16/2020 9:13:53 PM

The cumulative change of these new votes by examining the beginning and ending leading_candidate_votes and trailing_candidate_votes resulted in only 17 new votes for your party however, 17274 for the Democrat party. Furthermore, during, 11/7/2020 2:51:06 AM and 11/10/2020 1:56:53 AM, the Repulication leading_candidate_votes total actually decreased by -4633 and -6305.

While these 'system logs' and statistical distribution may have valid explanations, I recommend a further analysis and investigation by the proper individuals is performed, to ensure Tarrant County does have integrity issues.

Sincerely,
Scott Severance
Data Scientist

ATTACH ADDITIONAL PAGES AS NEEDED

IV. STATEMENT OF FACTS**Page 3**

State the facts constituting the alleged violation(s), including the dates on which or the period of time in which the alleged violation(s) occurred. Identify allegations of fact not personally known to the complainant, but alleged on information and belief. Please use simple, concise, and direct statements.

ELECTION IN WHICH VIOLATION(S) OCCURRED

NAME OF ELECTION November 3, 2020 - Joint General and Special Elections DATE OF ELECTION 11 / 03 / 20
 COUNTY OR POLITICAL SUBDIVISION TARRANT COUNTY PRECINCT United States Representa

	absentee	early	election day	Total
Observed				
Frequencies				
Ron Wright	8,128	86,187	14,496	108,811
Stephen Daniel	10,139	96,837	13,330	120,306
Melanie A. Black	235	5,887	1,714	7,836
Total	18,502	188,911	29,540	236,953

	absentee	early	election day	Total
Expected				
Frequencies				
Ron Wright	8,496	86,750	13,565	108,811
Stephen Daniel	9,394	95,914	14,998	120,306
Melanie A. Black	612	6,247	977	7,836
Total	18,502	188,911	29,540	236,953

	absentee	early	election day	Total
ChiSquare				
Calculation				
Ron Wright	15.96	3.65	63.89	
Stephen Daniel	59.11	8.88	185.52	
Melanie A. Black	232.12	20.77	556.20	
Total				1,146.10

Tarrant County Voter Anomaly: Calculations

H0: Voting type and candidate are independent.

Ha: Voting type and candidate are not independent.

Reject H0 if $\chi^2 > 13.277$ ($\pm = 0.01$, $df = 4$)

$\chi^2 = 1146.10$

Conclusion: Sufficient evidence ($p < 0.001$) exists, using a significance level of 0.01, that vote type and candidate are not statistically independent.

Reason: A greater number of absentee votes were assigned to Stephen Daniel (Democrat) than expected under the hypothesis of independence.

ATTACH ADDITIONAL PAGES AS NEEDED

V. LISTING OF DOCUMENTS AND OTHER MATERIALS

Page 4

List all documents and other materials filed with this complaint. Additionally, list all other documents and other materials that are relevant to this complaint and that are within your knowledge, including their location, if known.

ATTACH ADDITIONAL PAGES AS NEEDED

VI. SIGNED STATEMENT**Page 5**

I, SCOTT SEVERANCE, the undersigned,
PRINTED NAME OF COMPLAINANT
under penalty of perjury do swear or affirm that the information contained in this
complaint is true and correct to the best of my knowledge.

I have read and understand the accompanying instructions, and I am aware that
completion of this form cannot and will not alter the outcome of the election.



SIGNATURE OF COMPLAINANT

**NOTICE: THIS COMPLAINT IS NOT CONFIDENTIAL; ONCE REVIEWED BY
THE SECRETARY OF STATE, IT WILL BE TREATED AS A PUBLIC RECORD.**

REMINDER: YOU MUST SIGN THIS FORM PRIOR TO SUBMITTING**IF MAILING, PLEASE SEND TO:**

Texas Secretary of State
Elections Division
c/o Legal Dept.
P.O. Box 12060
Austin, TX 78711

IF FAXING, PLEASE SEND TO:

512.475.2811

IF EMAILING, PLEASE SEND TO:

elections@sos.texas.gov

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Please note that recount request deadlines occur soon after the canvass - a recount must be requested not later than two days following the canvass. More information on filing recounts (including form, deposit information, and who and how to file) is available on the Secretary of State's website.

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If you think either a recount or an election contest is the proper procedure for the remedy you seek, you may wish to consult private legal counsel regarding your legal options. The Secretary of State staff can provide general guidance on these procedures as well.

From: Elections Internet
Sent: Friday, November 20, 2020 3:14 PM
To: [REDACTED]
Subject: FW: Election Complaint form PDF from a voter in Fort Worth
Attachments: Complaint form.pdf; Cindy Hasio.pdf

Thank you for contacting the Elections Division of the Office of the Texas Secretary of State.

Attached is a response to your complaint that was submitted to our office regarding your concerns against election workers at UNT Health Science Center Fort Worth.

Again, thank you for contacting our office. If you have any additional questions or if we can be of further assistance, please contact our office at 1.800.252.8386 or email us at Elections@sos.texas.gov.

Elections Division

Office of the Secretary of State
800-252-VOTE(8683)

www.sos.state.tx.us/elections/index.shtml

For Voter Related Information, please visit:



The information contained in this email is intended to provide advice and assistance in election matters per §31.004 of the Texas Election Code. It is not intended to serve as legal advice for any matter. Please review the law yourself, and consult with an attorney when your legal rights are involved.

From: Graphic Designer <[REDACTED]>
Sent: Thursday, October 29, 2020 1:19 AM
To: Elections Internet <Elections@sos.texas.gov>
Subject: Election Complaint form PDF from a voter in Fort Worth

CAUTION: This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to informationsecurity@sos.texas.gov.

Hi nobody in Tarrant County voting responded to my email I sent them on Oct. 22, 2020, so I am going to email you my complaint.

I downloaded your election SOS complaint form from the TEXAS SECRETARY OF STATE website and created a PDF where nobody can edit it.

I hope you receive my complaint since Tarrant County didn't bother to respond after I called them first and then emailed them.

Cindy Hasio

The State of Texas



Elections Division
P.O. Box 12060
Austin, Texas 78711-2060
www.sos.state.tx.us

Phone: 512-463-5650
Fax: 512-475-2811
Dial 7-1-1 For Relay Services
(800) 252-VOTE (8683)

Ruth R. Hughs
Secretary of State

November 19, 2020

Via electronic mail: [REDACTED]

Dear Ms. Hasio,

This letter is in response to the complaint you submitted to our office regarding election workers at the UNT Health Science Center Fort Worth being rude and possibly discriminatory towards you.

The Office of the Texas Secretary of State does not have any authority to investigate allegations of criminal conduct. However, if our office receives a complaint that provides reasonable cause to suspect that alleged criminal conduct occurred in connection to an election, our office is required to refer the complaint to the Texas Attorney General for investigation. Tex. Elec. Code § 31.006 (2015).

Our office has reviewed each of your concerns, but none of the facts that you have presented to us in your complaint appear to involve criminal matters under the election code. Therefore, our office is not referring this matter to the Texas Attorney General for investigation. If you have additional information that was not included in your complaint that demonstrates that criminal conduct may have occurred, please send it to us for further review.

If you have any further questions, please do not hesitate to contact the Elections Division toll-free at 1-800-252-(VOTE) 8683.

Sincerely,

A handwritten signature in blue ink, appearing to read "Keith Ingram", enclosed in a rectangular box.

Keith Ingram
Director of Elections

KI:TS

ELECTION COMPLAINT TO THE TEXAS SECRETARY OF STATE

Docket Number

**OFFICE USE
ONLY**Date Hand-delivered or Date Postmarked
/ /

Please read the Important Information at the end of this document. The Secretary of State has no authority to order a new election, change an election result, or conduct a criminal investigation. A complaint filed with this form will not alter the results of an election.

This complaint form MUST BE SIGNED before it is submitted to the Secretary of State; therefore, you must print it out and sign it before mailing or faxing a copy or emailing a scanned, signed copy.

I. IDENTITY OF COMPLAINANT

1 COMPLAINANT NAME	MS / MRS / MR		FIRST		MI	
	Ms Cindy					
2 COMPLAINANT PHYSICAL ADDRESS	NICKNAME		LAST		SUFFIX	
			Hasio			
3 COMPLAINANT MAILING ADDRESS ☒ (check if same as above)	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY		STATE ZIP CODE	
	3717 Byers Avenue		Fort Worth		TX 76107	
4 COMPLAINANT TELEPHONE NUMBER	AREA CODE PHONE NUMBER EXT		5 COMPLAINANT E-MAIL ADDRESS			
	(940) 312-9777					

II. IDENTITY OF RESPONDENT

PERSON OR ENTITY COMMITTING ALLEGED VIOLATION(S)

6 RESPONDENT NAME	MS / MRS / MR		FIRST		MI	
	N/A					
7 RESPONDENT POSITION OR TITLE	NICKNAME		LAST		SUFFIX	
8 RESPONDENT PHYSICAL ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY		STATE ZIP CODE	
	3500 Camp Bowie Blvd		Fort Worth		TX 76107	
9 RESPONDENT MAILING ADDRESS ☒ (check if same as above)	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY		STATE ZIP CODE	
10 RESPONDENT TELEPHONE NUMBER	AREA CODE PHONE NUMBER EXT		11 RESPONDENT E-MAIL ADDRESS (IF KNOWN)			
			N/A			

GO TO PAGE 2

III. NATURE OF ALLEGED VIOLATION

Page2

If you believe that a criminal violation of the Code has occurred, please state the specific acts committed by the person or entity named in this complaint, along with a reference to the section of the Code alleged to have been violated, if known. If you need more space, please attach a separate sheet.

Unfriendly and discriminatory treatment towards me the voter (I am Asian-American) at UNT Health Science Center at 3500 Camp Bowie Blvd. in Fort Worth, Tx by employee (African-American female) who was hired to take registration and ID for early voting.

ATTACH ADDITIONAL PAGES AS NEEDED

AMERICAN
OVERSIGHT

NOTICE: THIS COMPLAINT IS PUBLIC RECORD ONCE REVIEW IS COMPLETED BY THE SECRETARY OF STATE. TX SOS 21-1682-E-000635

Revised 2/28/2014

IV. STATEMENT OF FACTS**Page 3**

State the facts constituting the alleged violation(s), including the dates on which or the period of time in which the alleged violation(s) occurred. Identify allegations of fact not personally known to the complainant, but alleged on information and belief. Please use simple, concise, and direct statements.

ELECTION IN WHICH VIOLATION(S) OCCURRED

NAME OF ELECTION EARLY VOTING ELECTION 2020 DATE OF ELECTION 11 / 03 / 20
 COUNTY OR POLITICAL SUBDIVISION Tarrant County PRECINCT UNT Health Science

I never really had good experiences (Oct. 22, 2020 and in the past in 2012) when I early voted at the UNT Health Science Center at 3500 Camp Bowie Blvd. in Fort Worth, Tx. I live right down the block and I am an Asian-American woman that is also a US Army veteran. I came there on 10/22/2020 around 2 PM. They were not busy and there were 3 people in front of me who were white that were greeted and welcomed. However, when I was next, the female just stared at me and said NOTHING but stuck her hand out expecting me to give her ID or registration. I feel absolutely unwelcome and the people that work there sitting at the front desks that give the numbers are unfriendly. I have NEVER been greeted. This happened the last election too in 2012. I came to vote at the same location and nobody in the front was nice to me. I remembered how I was treated the last 4 years too. Nobody was behind me but two white males and one white female. ALL of them were greeted and told "hello." However, when it was my turn, NOBODY working there greets me or even looks at me because I am Asian and they judge me negatively. They were unfriendly and the employee just stared at me and acted like I wasn't welcomed there at all. The three people that were in line in front of me were greeted but when it was my turn the female working there just gave me a cold hard stare and just stuck her hand out without saying one word to me when I was holding my ID. I found this very rude. Why can't I be treated with respect and dignity too like the white people that were greeted and welcomed? I am always given a cold hard stare and they say NOTHING to me. Nobody was in line behind me and they were not busy. This also happened at the Northwest TCC campus when I voted 2 years ago. Everyone white was greeted and I was ignored. I am sick and tired of being treated as if I were "less than" with no respect or acknowledgement. It is very bad manners. They should greet everyone, especially since they are not busy. I have to complain about this so I can teach people how to treat me and that shouldn't be that way.

It only takes one second to say "hi" and instead I remember how I was treated for the next 4 years. I was hoping they would greet me today on October 22, 2020 but they failed to do that again and succeeded in making me feel absolutely substandard compared to the white voters who were greeted and acknowledge because of their race. It makes me not want to vote next time for how I am treated. The people hired should be respectful to everyone regardless of what they look like or what race they are.

This was another BAD experience with the Tarrant County early voting place at the UNT Health Science Center at 3500 Camp Bowie Blvd. in Fort Worth, Texas. Please train your employees to be respectful to all who make an effort to come in and vote. I will not come back there again to vote in the future. It seems that they dislike Asians like me even though I am an American citizen, lived in Texas for decades and served in the US Army.

They also treated me the same way in 2012 and they just stared at me and said nothing while they greeted all the Caucasian voters in line in front of me. I remembered that for 4 years. I can tell the people hired working at the polls perceive the Caucasian voters as being more valued, which is why they got treated with respect and greeted and I was ignored, stared at and given dirty looks when I spoke up for myself. I stand up for myself when I am mistreated or not treated the same as the other voters of different races.

I hope a supervisor or manager higher up (not from that location) who will respond to my email because I already have had a bad impression of your employees from not saying anything to me.

ATTACH ADDITIONAL PAGES AS NEEDED

V. LISTING OF DOCUMENTS AND OTHER MATERIALS

Page 4

List all documents and other materials filed with this complaint. Additionally, list all other documents and other materials that are relevant to this complaint and that are within your knowledge, including their location, if known.

I called Tarrant County Voting and the receptionist told me to send an email to electionsinfo@tarrantcounty.com.

I wrote them on Oct. 22 and they never responded to me at all.

I sent them another email on Oct. 29, 2020 which said, "Hi, I sent an email on October 22, 2020 (see below). Since nobody bothered to respond to my complaint, I will take the next step up the Chain of Command and write an email to the ELECTION COMPLAINT TO THE TEXAS SECRETARY OF STATE. Hopefully, they will respond or have you respond to me and take action."

ATTACH ADDITIONAL PAGES AS NEEDED

VI. SIGNED STATEMENT

Page 5

I, Cindy Hasio, the undersigned,
PRINTED NAME OF COMPLAINANT
under penalty of perjury do swear or affirm that the information contained in this
complaint is true and correct to the best of my knowledge.

I have read and understand the accompanying instructions, and I am aware that
completion of this form cannot and will not alter the outcome of the election.

SIGNATURE OF COMPLAINANT

**NOTICE: THIS COMPLAINT IS NOT CONFIDENTIAL; ONCE REVIEWED BY
THE SECRETARY OF STATE, IT WILL BE TREATED AS A PUBLIC RECORD.**

PRINT

RESET

REMINDER: YOU MUST SIGN THIS FORM PRIOR TO SUBMITTING**IF MAILING, PLEASE SEND TO:**

Texas Secretary of State
Elections Division
c/o Legal Dept.
P.O. Box 12060
Austin, TX 78711

IF FAXING, PLEASE SEND TO:

512.475.2811

IF EMAILING, PLEASE SEND TO:

elections@sos.texas.gov

VII. IMPORTANT INFORMATION

Pursuant to Section 31.006 of the Texas Election Code (the "Code"), the Office of the Secretary of State (the "Secretary of State") has the ability to refer elections complaints to the Office of the Attorney General (the "Attorney General"). If, after receiving a complaint alleging criminal conduct in connection with an election, the Secretary of State determines that there is reasonable cause to suspect that the alleged criminal conduct occurred, the Secretary of State shall promptly refer the complaint to the Attorney General. The Secretary of State shall deliver to the Attorney General all pertinent documents in the Secretary of State's possession.

Any person who believes that a criminal violation of the Code has occurred may file a complaint. In order to initiate the complaint process, a written and signed complaint must be filed with the Secretary of State. The complaint must allege the violation with particularity, identify the person(s) or entity responsible for the alleged violation, and contain a reference to the section of the Code alleged to have been criminally violated, if known.

The Secretary of State has no authority to order a new election, change an election result, or conduct a criminal investigation. This form is to be used solely to document alleged election irregularities and submit allegations of criminal violations of the Code to be referred to the Attorney General. Often complaints will be Code violations that do not amount to criminal violations or acts. These violations are election irregularities which may form the basis of an election contest, but do not carry a criminal penalty. These election irregularities will not be referred to the Attorney General for possible criminal prosecution.

Challenging an election result can be done either through (1) a recount or (2) an election contest. If you are seeking to alter the outcome of the election, you will need to use one of these methods of challenging the results, described below. **A complaint filed with this form will not alter the results of an election.**

Legal Remedies That May Alter the Election Outcome

1. Recount

Recounts are used only to recount the votes in a particular race (office) or measure. A recount does not have the scope or authority of an election contest in court, i.e., the recount committee will not look at the manner in which voters were qualified to vote in person or by mail or whether voters were eligible to vote in the election. The governing body of an entity cannot conduct a recount on its own motion, e.g., at the canvass.

Please note that recount request deadlines occur soon after the canvass - a recount must be requested not later than two days following the canvass. More information on filing recounts (including form, deposit information, and who and how to file) is available on the Secretary of State's website.

2. Election Contest

If a candidate disputes the outcome of the election, regardless of whether or not a recount has been conducted, and has discovered irregularities, fraud, or mistakes in the conduct of the election that affected or could have affected the outcome, he/she can file an election contest to challenge the election results. The legal question raised by an election contest is whether the outcome of the contested election, as shown by the final canvass, is not (or cannot be conclusively determined to be) the true outcome because (1) illegal votes were counted, or because (2) an election officer or other official administering the election either (i) prevented eligible voters from voting, (ii) failed to count legal votes, (iii) engaged in fraud or illegal conduct, or (iv) erred in some material way.

Contests involving county elections are filed in the district court in the relevant county. In most circumstances, the filing deadline for an election contest is 30 days after the canvass, except in the case of a primary or an election where a runoff is necessary, in which case the deadline for filing is 10 days after the final canvass. If a recount is held and the votes are changed, the date of the canvass of the recount (i.e., final canvass) becomes the new date by which the contest deadline is calculated.

Any losing candidate may contest an election. In a contest of an officer election, the contestant files suit against the election's winner (or in the event that the election outcome is determined by majority vote rather than plurality vote, the person or persons entitled to a place on the runoff ballot). Voters at large within a political subdivision do not possess standing to intervene as parties to an election contest for public office.

In an election contest, the court has the authority to: (1) examine ballots and equipment; (2) compel voters to reveal how they voted; (3) declare an election void if illegal votes are greater than or equal to the number of votes necessary to change the outcome or cannot ascertain the true outcome of the election; (4) order a new election (or new runoff election), if unable to ascertain true outcome; (5) subtract illegal votes, if able to determine the side for which an illegal vote was cast; or (6) declare outcome of election, if able to ascertain true outcome.

If you think either a recount or an election contest is the proper procedure for the remedy you seek, you may wish to consult private legal counsel regarding your legal options. The Secretary of State staff can provide general guidance on these procedures as well.

From: Elections Internet
Sent: Friday, November 20, 2020 2:36 PM
To: [REDACTED]
Cc: 'HIGarcia@tarrantcounty.com'
Subject: FW: Election Complaint Form
Attachments: Election Complaint Form; Stephen Bridgeman.pdf

Thank you for contacting the Elections Division of the Office of the Texas Secretary of State.

Attached is a response to your complaint that was submitted to our office regarding your concerns against the Tarrant County Elections Administrator, Heider Garcia, for not providing curbside voting at all Tarrant County polling locations.

Again, thank you for contacting our office. If you have any additional questions or if we can be of further assistance, please contact our office at 1.800.252.8386 or email us at Elections@sos.texas.gov.

Elections Division
Office of the Secretary of State
800-252-VOTE(8683)
www.sos.state.tx.us/elections/index.shtml
For Voter Related Information, please visit:



The information contained in this email is intended to provide advice and assistance in election matters per §31.004 of the Texas Election Code. It is not intended to serve as legal advice for any matter. Please review the law yourself, and consult with an attorney when your legal rights are involved.

The State of Texas



Elections Division
P.O. Box 12060
Austin, Texas 78711-2060
www.sos.state.tx.us

Phone: 512-463-5650
Fax: 512-475-2811
Dial 7-1-1 For Relay Services
(800) 252-VOTE (8683)

Ruth R. Hughs
Secretary of State

November 19, 2020

Via electronic mail: [REDACTED]

Dear Mr. Bridgeman,

This letter is in response to the complaint you submitted to our office regarding Heider Garcia, Tarrant County Elections Administrator, for not providing curbside voting at every polling location.

The Office of the Texas Secretary of State does not have any authority to investigate allegations of criminal conduct. However, if our office receives a complaint that provides reasonable cause to suspect that alleged criminal conduct occurred in connection to an election, our office is required to refer the complaint to the Texas Attorney General for investigation. Tex. Elec. Code § 31.006 (2015).

Our office has reviewed each of your concerns, but none of the facts that you have presented to us in your complaint appear to involve criminal matters under the election code. Therefore, our office is not referring this matter to the Texas Attorney General for investigation. If you have additional information that was not included in your complaint that demonstrates that criminal conduct may have occurred, please send it to us for further review.

If you have any further questions, please do not hesitate to contact the Elections Division toll-free at 1-800-252-(VOTE) 8683.

Sincerely,

A handwritten signature in blue ink, appearing to read "Keith Ingram".

Keith Ingram
Director of Elections

KI:TS

ELECTION COMPLAINT TO THE TEXAS SECRETARY OF STATE

Docket Number

**OFFICE USE
ONLY**Date Hand-delivered or Date Postmarked
/ /

Please read the Important Information at the end of this document. The Secretary of State has no authority to order a new election, change an election result, or conduct a criminal investigation. A complaint filed with this form will not alter the results of an election.

This complaint form **MUST BE SIGNED** before it is submitted to the Secretary of State; therefore, you must print it out and sign it before mailing or faxing a copy or emailing a scanned, signed copy.

I. IDENTITY OF COMPLAINANT

1 COMPLAINANT NAME	MS / MRS / MR	FIRST	MI
	Mr. Stephen		W
	NICKNAME	LAST	SUFFIX
		Bridgeman	
2 COMPLAINANT PHYSICAL ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY STATE ZIP CODE
	3740 Wyatt Earp Road Apt 915		Roanoke TX 76262
(Full home or business address, including street, city, state, and zip code)			
3 COMPLAINANT MAILING ADDRESS ☒ (check if same as above)	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY STATE ZIP CODE
(Full home or business address, including street, city, state, and zip code)			
4 COMPLAINANT TELEPHONE NUMBER	AREA CODE	PHONE NUMBER	EXT
	(817)	228-8130	
5 COMPLAINANT E-MAIL ADDRESS			

II. IDENTITY OF RESPONDENT

PERSON OR ENTITY COMMITTING ALLEGED VIOLATION(S)

6 RESPONDENT NAME	MS / MRS / MR	FIRST	MI
	Mr. Heider		
	NICKNAME	LAST	SUFFIX
		Garcia	
7 RESPONDENT POSITION OR TITLE	Tarrant County Elections Administrator		
8 RESPONDENT PHYSICAL ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY STATE ZIP CODE
	2700 Premier Street		Fort Worth TX 76111
(Full home or business address, including street, city, state, and zip code)			
9 RESPONDENT MAILING ADDRESS ☐ (check if same as above)	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY STATE ZIP CODE
	P.O. Box 961011		Fort Worth TX 76161
(Full home or business address, including street, city, state, and zip code)			
10 RESPONDENT TELEPHONE NUMBER	AREA CODE	PHONE NUMBER	EXT
	(817)	831-8683	
11 RESPONDENT E-MAIL ADDRESS (IF KNOWN)		higarcia@tarrantcounty.com	

GO TO PAGE 2

NOTICE: THIS COMPLAINT IS PUBLIC RECORD ONCE REVIEW IS COMPLETED BY THE SECRETARY OF STATE AND/OR ATTORNEY GENERAL.

AMERICAN
OVERSIGHT

TX-SOS-21-1682-E-000042 Revised 2/28/2014

III. NATURE OF ALLEGED VIOLATION**Page2**

If you believe that a criminal violation of the Code has occurred, please state the specific acts committed by the person or entity named in this complaint, along with a reference to the section of the Code alleged to have been violated, if known. If you need more space, please attach a separate sheet.

Failure of polling place to provide curbside voting, or a voter alert sign for handicapped voters.

ATTACH ADDITIONAL PAGES AS NEEDED

IV. STATEMENT OF FACTS**Page 3**

State the facts constituting the alleged violation(s), including the dates on which or the period of time in which the alleged violation(s) occurred. Identify allegations of fact not personally known to the complainant, but alleged on information and belief. Please use simple, concise, and direct statements.

ELECTION IN WHICH VIOLATION(S) OCCURRED

NAME OF ELECTION 2020 General Election DATE OF ELECTION 1 1 0 3 2 0 2 0
MM/DD/YYYY

COUNTY OR POLITICAL SUBDIVISION Tarrant County PRECINCT Early Voting

Date of Alleged Violation: 10-16-2020

Location of Alleged Violation: Villages of Woodland Springs
12209 Timberland Blvd
Fort Worth, TX 76244

I am a voter who is confined to a wheelchair. My wife had to open the ramp from our van in the middle of the parking lot because there were no spaces available. I searched outside for the handicapped alert sign that is required by law. There was no sign. And there was no option for curbside voting either.

So I was forced to ask people to move off the sidewalk so I could get inside the building. I found the handicapped alert sign just inside the doorway. But it had no button on it.

I asked to speak to the Elections Judge, and was informed that she had gone to lunch. So I asked to speak to whomever was in charge of the polling place. And there was no one else.

When I asked why curbside voting and disabled voting was not available, I was told that there was only one person who worked that polling place who was trained in taking the DRE outside so voters with disabilities could vote. And that person had called out with COVID-19 on Monday night October 12th. I was told that they would have a replacement person on Monday October 19th if I wanted to come back. I said that since I was already inside, could I go ahead and vote. She moved me to the front of the line, and I was able to vote.

Early Voting began on October 13th. So this polling place lacked the curbside and disabled voting required by law for an entire week.

ATTACH ADDITIONAL PAGES AS NEEDED

V. LISTING OF DOCUMENTS AND OTHER MATERIALS**Page 4**

List all documents and other materials filed with this complaint. Additionally, list all other documents and other materials that are relevant to this complaint and that are within your knowledge, including their location, if known.

ATTACH ADDITIONAL PAGES AS NEEDED

VI. SIGNED STATEMENT**Page 5**

I, Stephen W. Bridgeman, the undersigned,
PRINTED NAME OF COMPLAINANT

under penalty of perjury do swear or affirm that the information contained in this complaint is true and correct to the best of my knowledge.

I have read and understand the accompanying instructions, and I am aware that completion of this form cannot and will not alter the outcome of the election.


SIGNATURE OF COMPLAINANT

**NOTICE: THIS COMPLAINT IS NOT CONFIDENTIAL; ONCE REVIEWED BY
THE SECRETARY OF STATE, IT WILL BE TREATED AS A PUBLIC RECORD.**

REMINDER: YOU MUST SIGN THIS FORM PRIOR TO SUBMITTING**IF MAILING, PLEASE SEND TO:**

Texas Secretary of State
Elections Division
c/o Legal Dept.
P.O. Box 12060
Austin, TX 78711

IF FAXING, PLEASE SEND TO:

512.475.2811

IF EMAILING, PLEASE SEND TO:

elections@sos.texas.gov

VII. IMPORTANT INFORMATION

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Challenging an election result can be done either through (1) a recount or (2) an election contest. If you are seeking to alter the outcome of the election, you will need to use one of these methods of challenging the results, described below. **A complaint filed with this form will not alter the results of an election.**

Legal Remedies That May Alter the Election Outcome

1. Recount

Recounts are used only to recount the votes in a particular race (office) or measure. A recount does not have the scope or authority of an election contest in court, i.e., the recount committee will not look at the manner in which voters were qualified to vote in person or by mail or whether voters were eligible to vote in the election. The governing body of an entity cannot conduct a recount on its own motion, e.g., at the canvass.

Please note that recount request deadlines occur soon after the canvass - a recount must be requested not later than two days following the canvass. More information on filing recounts (including form, deposit information, and who and how to file) is available on the Secretary of State's website.

2. Election Contest

If a candidate disputes the outcome of the election, regardless of whether or not a recount has been conducted, and has discovered irregularities, fraud, or mistakes in the conduct of the election that affected or could have affected the outcome, he/she can file an election contest to challenge the election results. The legal question raised by an election contest is whether the outcome of the contested election, as shown by the final canvass, is not (or cannot be conclusively determined to be) the true outcome because (1) illegal votes were counted, or because (2) an election officer or other official administering the election either (i) prevented eligible voters from voting, (ii) failed to count legal votes, (iii) engaged in fraud or illegal conduct, or (iv) erred in some material way.

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Any losing candidate may contest an election. In a contest of an officer election, the contestant files suit against the election's winner (or in the event that the election outcome is determined by majority vote rather than plurality vote, the person or persons entitled to a place on the runoff ballot). Voters at large within a political subdivision do not possess standing to intervene as parties to an election contest for public office.

In an election contest, the court has the authority to: (1) examine ballots and equipment; (2) compel voters to reveal how they voted; (3) declare an election void if illegal votes are greater than or equal to the number of votes necessary to change the outcome or cannot ascertain the true outcome of the election; (4) order a new election (or new runoff election), if unable to ascertain true outcome; (5) subtract illegal votes, if able to determine the side for which an illegal vote was cast; or (6) declare outcome of election, if able to ascertain true outcome.

If you think either a recount or an election contest is the proper procedure for the remedy you seek, you may wish to consult private legal counsel regarding your legal options. The Secretary of State staff can provide general guidance on these procedures as well.

From: Elections Internet
Sent: Thursday, December 17, 2020 2:28 PM
To: [REDACTED]
Subject: FW: Election Complaint to the Texas Secretary of State
Attachments: Tarrant_complaintform-sos.pdf; Scott Severance.pdf

Thank you for contacting the Elections Division of the Office of the Texas Secretary of State.

Attached is a response to your complaint that was submitted to our office regarding your concerns about a statistical anomaly regarding Congressman Wright's November 3, 2020 Tarrant County election loss.

Again, thank you for contacting our office. If you have any additional questions or if we can be of further assistance, please contact our office at 1.800.252.8386 or email us at Elections@sos.texas.gov.

Elections Division

Office of the Secretary of State
800-252-VOTE(8683)

www.sos.state.tx.us/elections/index.shtml

For Voter Related Information, please visit:



The information contained in this email is intended to provide advice and assistance in election matters per §31.004 of the Texas Election Code. It is not intended to serve as legal advice for any matter. Please review the law yourself, and consult with an attorney when your legal rights are involved.

From: Scott Severance [REDACTED] >
Sent: Monday, November 23, 2020 12:44 PM
To: Elections Internet <Elections@sos.texas.gov>
Subject: Election Complaint to the Texas Secretary of State

CAUTION: This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to informationsecurity@sos.texas.gov.

Attention: Election Complaint to the Texas Secretary of State

Please find the attached form with regards to the Tarrant County, Texas, 11/3/2020 election results.

Sincerely,

Scott Severance

The State of Texas

Elections Division
P.O. Box 12060
Austin, Texas 78711-2060
www.sos.state.tx.us



Ruth R. Hughs
Secretary of State

Phone: 512-463-5650
Fax: 512-475-2811
Dial 7-1-1 For Relay Services
(800) 252-VOTE (8683)

December 17, 2020

Scott Severance
606 Hollyberry Dr.
Mansfield, TX 76063
[REDACTED]

Dear Mr. Severance,

This letter is in response to the complaint you submitted to our office regarding possible election irregularities in an election in Tarrant County.

In your complaint you provide a data analysis that you allege indicates a statistical anomaly in the vote totals for candidates in a congressional race in Tarrant County. Your complaint indicated that you wished to see an investigation into Smartmatic voting systems used in Tarrant County.

Please note that Tarrant County does not use Smartmatic voting systems, but rather uses Hart Intercivic's Verity Voting 2.4 system. Smartmatic does not currently have any voting systems that are certified for use in elections occurring in the State of Texas.

Our office does not have any investigative or enforcement authority, and we only have the authority to refer criminal conduct to the Office of the Attorney General when that criminal conduct constitutes a criminal offense under the Election Code. Because your complaint did not include any allegations of criminal conduct under the Election Code, we are unable to refer your complaint at this time.

If you have any further questions, please do not hesitate to contact the Elections Division toll-free at 1-800-252-(VOTE) 8683.

Sincerely,

A handwritten signature in blue ink, appearing to read "Keith Ingram".

Keith Ingram
Director of Elections

KI:CP

ELECTION COMPLAINT TO THE TEXAS SECRETARY OF STATE

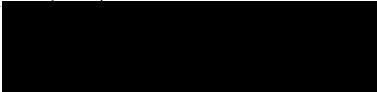
Docket Number

**OFFICE USE
ONLY**Date Hand-delivered or Date Postmarked
/ /

Please read the Important Information at the end of this document. The Secretary of State has no authority to order a new election, change an election result, or conduct a criminal investigation. A complaint filed with this form will not alter the results of an election.

This complaint form MUST BE SIGNED before it is submitted to the Secretary of State; therefore, you must print it out and sign it before mailing or faxing a copy or emailing a scanned, signed copy.

I. IDENTITY OF COMPLAINANT

1 COMPLAINANT NAME	MS / MRS / MR		FIRST		MI	
	Mr Scott		LAST		A SUFFIX	
Severance						
2 COMPLAINANT PHYSICAL ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY		STATE ZIP CODE	
	606 Hollyberry Dr		Mansfield		TX 76063	
(Full home or business address, including street, city, state, and zip code)						
3 COMPLAINANT MAILING ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY		STATE ZIP CODE	
	☒ (check if same as above)					
(Full home or business address, including street, city, state, and zip code)						
4 COMPLAINANT TELEPHONE NUMBER	AREA CODE	PHONE NUMBER	EXT	5 COMPLAINANT E-MAIL ADDRESS		
	2142233254					

II. IDENTITY OF RESPONDENT

PERSON OR ENTITY COMMITTING ALLEGED VIOLATION(S)

6 RESPONDENT NAME	MS / MRS / MR		FIRST		MI	
	NICKNAME		LAST		SUFFIX	
7 RESPONDENT POSITION OR TITLE						
8 RESPONDENT PHYSICAL ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY		STATE ZIP CODE	
(Full home or business address, including street, city, state, and zip code)						
9 RESPONDENT MAILING ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY		STATE ZIP CODE	
	☐ (check if same as above)					
(Full home or business address, including street, city, state, and zip code)						
10 RESPONDENT TELEPHONE NUMBER	AREA CODE	PHONE NUMBER	EXT	11 RESPONDENT E-MAIL ADDRESS (IF KNOWN)		

GO TO PAGE 2

III. NATURE OF ALLEGED VIOLATION**Page2**

If you believe that a criminal violation of the Code has occurred, please state the specific acts committed by the person or entity named in this complaint, along with a reference to the section of the Code alleged to have been violated, if known. If you need more space, please attach a separate sheet.

I would like to bring to your attention a statistical anomaly regarding Congressman Wright's November 3, 2020 Tarrant County election loss. I believe the following analysis should warrant a further investigation into the Smartmatic voting systems in Tarrant County by a digital forensic team.

To determine if any anomalies in Congressman Wright's loss to Stephen Daniel by 11,495 votes, and President Trump's loss in the county of 1,826 votes, as reported at <http://access.tarrantcounty.com/content/dam/main/elections/2020/1120/reports/cumulative.pdf>, I performed a ChiSquare test to examine the distribution of absentee, early, and election day votes. The outcome of this test indicated a greater number of absentee votes were assigned to Stephen Daniel (Democrat) than expected under the hypothesis of independence. While this may be legitimate, it warrants a deeper investigation.

Tarrant County Voter Fraud: Calculations

H0: Voting type and candidate are independent.

Ha: Voting type and candidate are not independent.

Reject H0 if $\chi^2 > 13.277$ ($\alpha = 0.01$, $df = 4$)

$\chi^2 = 1146.10$

Conclusion: Sufficient evidence ($p < 0.001$) exists, using a significance level of 0.01, that vote type and candidate are not statistically independent. Reason: A greater number of absentee votes were assigned to Stephen Daniel (Democrat) than expected under the hypothesis of independence.

Furthermore, when evaluating the change log recorded from these machines by NYT API, and subsequently captured in this repo, <https://github.com/alex/nyt-2020-election-scraper>, we see Tarrant County sent updates on the following times:

11/6/2020 4:10:40 AM

11/6/2020 4:14:00 AM

11/7/2020 2:51:06 AM

11/10/2020 1:56:53 AM

11/16/2020 9:13:53 PM

The cumulative change of these new votes by examining the beginning and ending leading_candidate_votes and trailing_candidate_votes resulted in only 17 new votes for your party however, 17274 for the Democrat party. Furthermore, during, 11/7/2020 2:51:06 AM and 11/10/2020 1:56:53 AM, the Repulication leading_candidate_votes total actually decreased by -4633 and -6305.

While these 'system logs' and statistical distribution may have valid explanations, I recommend a further analysis and investigation by the proper individuals is performed, to ensure Tarrant County does have integrity issues.

Sincerely,
Scott Severance
Data Scientist

ATTACH ADDITIONAL PAGES AS NEEDED

IV. STATEMENT OF FACTS**Page 3**

State the facts constituting the alleged violation(s), including the dates on which or the period of time in which the alleged violation(s) occurred. Identify allegations of fact not personally known to the complainant, but alleged on information and belief. Please use simple, concise, and direct statements.

ELECTION IN WHICH VIOLATION(S) OCCURRED

NAME OF ELECTION November 3, 2020 - Joint General and Special Elections DATE OF ELECTION 11 / 03 / 20
 COUNTY OR POLITICAL SUBDIVISION TARRANT COUNTY PRECINCT United States Representa

	absentee	early	election day	Total
Observed				
Frequencies				
Ron Wright	8,128	86,187	14,496	108,811
Stephen Daniel	10,139	96,837	13,330	120,306
Melanie A. Black	235	5,887	1,714	7,836
Total	18,502	188,911	29,540	236,953

	absentee	early	election day	Total
Expected				
Frequencies				
Ron Wright	8,496	86,750	13,565	108,811
Stephen Daniel	9,394	95,914	14,998	120,306
Melanie A. Black	612	6,247	977	7,836
Total	18,502	188,911	29,540	236,953

	absentee	early	election day	Total
ChiSquare				
Calculation				
Ron Wright	15.96	3.65	63.89	
Stephen Daniel	59.11	8.88	185.52	
Melanie A. Black	232.12	20.77	556.20	
Total				1,146.10

Tarrant County Voter Anomaly: Calculations

H0: Voting type and candidate are independent.

Ha: Voting type and candidate are not independent.

Reject H0 if $\chi^2 > 13.277$ ($\pm = 0.01$, $df = 4$)

$\chi^2 = 1146.10$

Conclusion: Sufficient evidence ($p < 0.001$) exists, using a significance level of 0.01, that vote type and candidate are not statistically independent.

Reason: A greater number of absentee votes were assigned to Stephen Daniel (Democrat) than expected under the hypothesis of independence.

ATTACH ADDITIONAL PAGES AS NEEDED

V. LISTING OF DOCUMENTS AND OTHER MATERIALS

Page 4

List all documents and other materials filed with this complaint. Additionally, list all other documents and other materials that are relevant to this complaint and that are within your knowledge, including their location, if known.

ATTACH ADDITIONAL PAGES AS NEEDED

VI. SIGNED STATEMENT**Page 5**

I, SCOTT SEVERANCE, the undersigned,
PRINTED NAME OF COMPLAINANT
under penalty of perjury do swear or affirm that the information contained in this
complaint is true and correct to the best of my knowledge.

I have read and understand the accompanying instructions, and I am aware that
completion of this form cannot and will not alter the outcome of the election.



SIGNATURE OF COMPLAINANT

**NOTICE: THIS COMPLAINT IS NOT CONFIDENTIAL; ONCE REVIEWED BY
THE SECRETARY OF STATE, IT WILL BE TREATED AS A PUBLIC RECORD.**

REMINDER: YOU MUST SIGN THIS FORM PRIOR TO SUBMITTING**IF MAILING, PLEASE SEND TO:**

Texas Secretary of State
Elections Division
c/o Legal Dept.
P.O. Box 12060
Austin, TX 78711

IF FAXING, PLEASE SEND TO:

512.475.2811

IF EMAILING, PLEASE SEND TO:

elections@sos.texas.gov

VII. IMPORTANT INFORMATION

Pursuant to Section 31.006 of the Texas Election Code (the "Code"), the Office of the Secretary of State (the "Secretary of State") has the ability to refer elections complaints to the Office of the Attorney General (the "Attorney General"). If, after receiving a complaint alleging criminal conduct in connection with an election, the Secretary of State determines that there is reasonable cause to suspect that the alleged criminal conduct occurred, the Secretary of State shall promptly refer the complaint to the Attorney General. The Secretary of State shall deliver to the Attorney General all pertinent documents in the Secretary of State's possession.

Any person who believes that a criminal violation of the Code has occurred may file a complaint. In order to initiate the complaint process, a written and signed complaint must be filed with the Secretary of State. The complaint must allege the violation with particularity, identify the person(s) or entity responsible for the alleged violation, and contain a reference to the section of the Code alleged to have been criminally violated, if known.

The Secretary of State has no authority to order a new election, change an election result, or conduct a criminal investigation. This form is to be used solely to document alleged election irregularities and submit allegations of criminal violations of the Code to be referred to the Attorney General. Often complaints will be Code violations that do not amount to criminal violations or acts. These violations are election irregularities which may form the basis of an election contest, but do not carry a criminal penalty. These election irregularities will not be referred to the Attorney General for possible criminal prosecution.

Challenging an election result can be done either through (1) a recount or (2) an election contest. If you are seeking to alter the outcome of the election, you will need to use one of these methods of challenging the results, described below. **A complaint filed with this form will not alter the results of an election.**

Legal Remedies That May Alter the Election Outcome

1. Recount

Recounts are used only to recount the votes in a particular race (office) or measure. A recount does not have the scope or authority of an election contest in court, i.e., the recount committee will not look at the manner in which voters were qualified to vote in person or by mail or whether voters were eligible to vote in the election. The governing body of an entity cannot conduct a recount on its own motion, e.g., at the canvass.

Please note that recount request deadlines occur soon after the canvass - a recount must be requested not later than two days following the canvass. More information on filing recounts (including form, deposit information, and who and how to file) is available on the Secretary of State's website.

2. Election Contest

If a candidate disputes the outcome of the election, regardless of whether or not a recount has been conducted, and has discovered irregularities, fraud, or mistakes in the conduct of the election that affected or could have affected the outcome, he/she can file an election contest to challenge the election results. The legal question raised by an election contest is whether the outcome of the contested election, as shown by the final canvass, is not (or cannot be conclusively determined to be) the true outcome because (1) illegal votes were counted, or because (2) an election officer or other official administering the election either (i) prevented eligible voters from voting, (ii) failed to count legal votes, (iii) engaged in fraud or illegal conduct, or (iv) erred in some material way.

Contests involving county elections are filed in the district court in the relevant county. In most circumstances, the filing deadline for an election contest is 30 days after the canvass, except in the case of a primary or an election where a runoff is necessary, in which case the deadline for filing is 10 days after the final canvass. If a recount is held and the votes are changed, the date of the canvass of the recount (i.e., final canvass) becomes the new date by which the contest deadline is calculated.

Any losing candidate may contest an election. In a contest of an officer election, the contestant files suit against the election's winner (or in the event that the election outcome is determined by majority vote rather than plurality vote, the person or persons entitled to a place on the runoff ballot). Voters at large within a political subdivision do not possess standing to intervene as parties to an election contest for public office.

In an election contest, the court has the authority to: (1) examine ballots and equipment; (2) compel voters to reveal how they voted; (3) declare an election void if illegal votes are greater than or equal to the number of votes necessary to change the outcome or cannot ascertain the true outcome of the election; (4) order a new election (or new runoff election), if unable to ascertain true outcome; (5) subtract illegal votes, if able to determine the side for which an illegal vote was cast; or (6) declare outcome of election, if able to ascertain true outcome.

If you think either a recount or an election contest is the proper procedure for the remedy you seek, you may wish to consult private legal counsel regarding your legal options. The Secretary of State staff can provide general guidance on these procedures as well.

From: Nanette Forbes <[REDACTED]>
Sent: Thursday, September 10, 2020 8:55 PM
To: Christina Adkins
Subject: FW: FW: County Election Website DOJ Complaint
Attachments: 20200903 DRTx DOJ Complaint - Inaccessible County Election Websites.pdf

CAUTION: This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to Informationsecurity@sos.texas.gov.

CAUTION: This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to Informationsecurity@sos.texas.gov.

Hi Christina,

Wanted you to be aware of the attached complaint. You are probably already aware of it but wanted to make sure.

I will be visiting with our legal department to see what we can do to help counties out. If you have any thoughts on this, I would greatly appreciate it.

Take care.

Thanks.
Nanette

From: Molly Broadway <[REDACTED]>
Sent: Thursday, September 10, 2020 10:10 AM
To: Christopher J. Davis <cjdavis@wilco.org>
Cc: Jeff Miller [REDACTED]
Subject: County Election Website DOJ Complaint

EXTERNAL email: Exercise caution when opening.

Chris,

I wanted to make you/TAEA aware of a DOJ complaint that DRTx filed on last Friday (see attached). About 84 counties were named in the complaint and I want you to know that this was not done out of any malicious but as a tool to assist in our common goal of increasing voter access to the elections process.

As always, we want keep our relationship and communication with you/TAEA as collaborative as possible. I am always happy to discuss any questions or thoughts you may have. For your reference, I am including a copy of the DOJ complaint.

Respectfully,

Molly Broadway, MSW

HAVA Training & Technical Support Specialist

Disability Rights Texas

[REDACTED]

office: 512-407-2725

Sent from my Sprint Samsung Galaxy S7.

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>

CARY ROBERTS

512-560-0434 mobile

512-482-8107 phone



U.S. Department of Justice, Civil Right Division
ADA Title II Complaint

Date: September 3, 2020

Complainant: Disability Rights Texas and REV UP

Respondents:

Archer County, Texas	Kaufman County, Texas	Rains County, Texas
Borden County, Texas	Kenedy County, Texas	Reagan County, Texas
Bowie County, Texas	Kimble County, Texas	Refugio County, Texas
Brazoria County, Texas	Kinney County, Texas	Rockwall County, Texas
Brooks County, Texas	Kleberg County, Texas	Runnels County, Texas
Burnet County, Texas	Knox County, Texas	Sabine County, Texas
Camp County, Texas	La Salle County, Texas	San Patricio County, Texas
Carson County, Texas	Lamar County, Texas	Scurry County, Texas
Castro County, Texas	Lamb County, Texas	Shackelford County, Texas
Cherokee County, Texas	Lampasas County, Texas	Shelby County, Texas
Cochran County, Texas	Leon County, Texas	Sherman County, Texas
Coke County, Texas	Lynn County, Texas	Smith County, Texas
Coleman County, Texas	Mason County, Texas	Stephens County, Texas
Colorado County, Texas	McCulloch County, Texas	Sutton County, Texas
Hale County, Texas	McMullen County, Texas	Swisher County, Texas
Hall County, Texas	Medina County, Texas	Taylor County, Texas
Hamilton County, Texas	Midland County, Texas	Terrell County, Texas
Hansford County, Texas	Milam County, Texas	Throckmorton County, Texas
Hardeman County, Texas	Mills County, Texas	Tom Green County, Texas
Hardin County, Texas	Montague County, Texas	Upshur County, Texas
Hartley County, Texas	Morris County, Texas	Upton County, Texas
Hidalgo County, Texas	Motley County, Texas	Van Zandt County, Texas
Hudspeth County, Texas	Navarro County, Texas	Washington County, Texas
Hutchinson County, Texas	Nolan County, Texas	Webb County, Texas
Jasper County, Texas	Ochiltree County, Texas	Wheeler County, Texas
Jeff Davis County, Texas	Panola County, Texas	Wilbarger County, Texas
Jim Hogg County, Texas	Parker County, Texas	Wilson County, Texas
Jones County, Texas	Presidio County, Texas	

RE: Failure to provide accessible county election websites in violation of Title II of the ADA and Section 504 of the Rehabilitation Act

Systemic Complaint Summary

This systemic complaint is being filed against several Texas counties who have failed to provide an accessible county election website in violation of Title II of the Americans with

Disabilities Act (“ADA”) and Section 504 of the Rehabilitation Act (“Section 504”). Despite Disability Rights Texas (“DRTx”) contacting these 83 counties and informing them of their website’s barriers to accessibility, asking them to develop a plan to address the accessibility problems, and offering to provide guidance on how to do this, these counties remain unresponsive. Since these counties have a currently inaccessible election website and also failed to respond to a request to provide a plan to address the inaccessibility problems, DRTx and REV UP file this Title II Department of Justice Complaint.

DRTx is the federally-mandated protection and advocacy organization for people with disabilities in Texas. Its purpose is to protect and advocate for the legal and human rights of individuals with disabilities, and it is authorized to do so under the Developmental Disabilities Assistance and Bill of Rights Act of 2000, 42 U.S.C. §§ 15041, *et seq.*; Protection and Advocacy for Mentally Ill Individuals Act, 42 U.S.C. §§ 10801, *et seq.*; and Protection and Advocacy for Individual Rights Act, 29 U.S.C. § 794e. In accordance with its federal mandate, DRTx has the authority, among other things, to pursue administrative, legal and other appropriate remedies to ensure the protection of rights of persons with disabilities. 29 U.S.C. § 794e (f)(3); 42 U.S.C. § 10805(a)(1)(B).

REV UP is a non-partisan, statewide, collaborative organization that empowers, educates, and provides outreach to the disability community and its allies (family members, supporters, professionals, the public, and policy makers). These efforts focus upon accessibility of polling sites; the rights of people with disabilities in the voting process; inclusive voter registration; education on disability issues; and mobilization of the disability vote.

Respondent and Contact Information

The respondents are 83 Texas counties who ranked as “poor performing” in terms of website accessibility in DRTx’s website accessibility survey conducted between January 2019 and January 2020. The results of the survey were reported in a white paper report “Web Failures: How County Voting Websites Leave Voters with Disabilities in the Dark” published on July 9, 2020. The report is included with this complaint and is marked as Exhibit A.

The following is the list of counties along with available contact information:

Archer County Courthouse
100 S Center St.
Archer City, TX 76351

Brooks County Courthouse
100 E Miller St
Falfurrias, TX 78355

Borden County Courthouse
117 E Wassom
Gail, TX 79738

Burnet County Courthouse
220 S. Pierce Street
Burnet, TX 78611

Bowie County Courthouse
710 James Bowie Drive
New Boston, TX 77515

Camp County Courthouse
126 Church Street, Room 303
Pittsburg, TX 75686

Brazoria County Courthouse
111 E Locust St # 102A
Angleton, TX 77515

Carson County Courthouse
501 Main Street
Panhandle, TX 79086

Castro County Courthouse
100 E. Bedford, Room 111
Dimmitt, TX 79027

Cherokee County Courthouse
135 S Main St 3rd floor
Rusk, TX 75785

Cochran County Courthouse
100 N Main St #105
Morton, TX 79346

Coke County Courthouse
13 East 7th
Robert Lee, TX 76945

Coleman County Courthouse
102 W Live Oak St.
Coleman, TX 76834

Colorado County Courthouse
400 Spring St # 113
Columbus, TX 78934

Hale County Courthouse
500 Broadway, Room 200
Plainview, TX 79072

Hall County Courthouse
512 W Main St #4
Memphis, TX 79245

Hamilton County Courthouse
102 N Rice
Hamilton, TX 76531

Hansford County Courthouse
16 Northwest Court
Spearman, TX 79081

Hardeman County Courthouse
P. O. Box 30
Quanah, TX 79252

Hardin County Courthouse
300 W Monroe Street
Kountze, TX 77625

Hartley County Courthouse
900 Main St
Channing, TX 79018

Hidalgo County Courthouse
100 E Cano St 2nd floor
Edinburg, TX 78539

Hudspeth County Courthouse
PO Box 68
Sierra Blanca, TX 79851

Hutchinson County Courthouse
500 N Main St #214
Stinnett, TX 79083

Jasper County Courthouse
121 N. Austin, Rm 106
Jasper, TX 75951

Jeff Davis County Courthouse
P.O. Box 836, 100 Court Avenue
Fort Davis, TX 79734

Jim Hogg County Courthouse
102 E Tilley St
Hebbronville, TX 78361

Jones County Courthouse
PO Box 148
Anson, TX 79501

Kaufman County Courthouse
100 W. Mulberry
Kaufman, TX 75142

Kenedy County Courthouse
151 N. Mallory
Sarita, TX 78385

Kimble County Courthouse
501 Main St
Junction, TX 76849

Kinney County Courthouse
501 S. Ann Street
Bracketville, TX 78832

Kleberg County Courthouse
700 E Kleberg Ave
Kingsville, TX 78363

Knox County Courthouse
P.O. Box 77
Benjamin, TX 79505

La Salle County Courthouse
101 Courthouse Square #315
Cotulla, TX 78014

Lamar County Courthouse
119 North Main
Paris, TX 75460

Lamb County Courthouse
100 6th Drive, Rm 101
Littlefield, TX 79339

Lampasas County Courthouse
501 E 4th St, Suite 103
Lampasas, TX 76550

Leon County Courthouse
130 E. St. Mary, P. O. Box 429
Centerville, TX 75833

Lynn County Courthouse
1501 S 1st St
Tahoka, TX 79373

Mason County Courthouse
201 Fort McKavett St
Mason, TX 76856

McCulloch County Courthouse
199 Courthouse Square
Brady, TX 76825

McMullen County Courthouse
P.O. Box 237
Tilden, TX 78072

Medina County Courthouse
1502 Avenue K, Rm. 201
Hondo, TX 78861

Midland County Courthouse
500 N. Loraine St., 11th Floor
Midland, TX 79701

Milam County Courthouse, 1st Floor
102 S Fannin Ave
Cameron, TX 76520

Mills County Courthouse
P.O. Box 483
Goldthwaite, TX 76844

Montague County Courthouse
P.O. Box 475
Montague, TX 76251

Morris County Courthouse
500 Broadnax, Suite B
Daingerfield, TX 75638

Motley County Courthouse
701 Dundee, P.O. Box 719
Matador, TX 79244

Navarro County Courthouse
300 W. 3rd Ave. Suite 102
Corsicana, TX 75110

Nolan County Courthouse
100 East Third, Suite 105
Sweetwater, TX 79556

Ochiltree County Courthouse
511 S. Main
Perryton, TX 79070

Panola County Courthouse
110 S. Sycamore St., Room 216-A
Carthage, TX 75663

Parker County Courthouse
1 Courthouse Square
Weatherford, TX 76086

Polk County Courthouse
101 W. Church St., Ste. 300
Livingston, TX 77351

Presidio County Courthouse
P.O. Box 606
Marfa, TX 79843

Rains County Courthouse
167 E. Quitman Street Ste. 102
Emory, TX 75440

Reagan County Courthouse
P.O. Box 100
Big Lake, TX 76932

Refugio County Courthouse
808 Commerce Street, Room 104
Refugio, TX 78377

Rockwall County Courthouse
101 E. Rusk St., Ste 201
Rockwall, TX 75087

Runnels County Courthouse
613 Hutchings Ave., Room 103
Ballinger, TX 76821

Sabine County Courthouse
201 Main Street - PO Box 716
Hemphill, TX 75948

San Patricio County Courthouse
400 West Sinton Street #109
Sinton, TX 78387

Scurry County Courthouse
1806 25th Street
Snyder, TX 79549

Shackelford County Courthouse
PO Box 2797
Albany, TX 76430

Shelby County Courthouse
200 San Augustine Box 6
Center, TX 75935

Sherman County Courthouse
P.O. Box 165
Stratford, TX 79084

Smith County Courthouse
200 E. Ferguson St., Suite 100
Tyler, TX 75702

Stephens County Courthouse
200 West Walker
Breckenridge, TX 76424

Sutton County Courthouse
P.O. Box 1212
Sonora, TX 76950

Swisher County Courthouse
119 South Maxwell
Tulia, TX 79088

Taylor County Courthouse
300 Oak St., Ste. 200
Abilene, TX 79602

Terrell County Courthouse
105 East Hackberry
Sanderson, TX 79848

Throckmorton County Courthouse
105 N. Minter
Throckmorton, TX 76483

Washington County Courthouse
100 E. Main, Ste. 104
Brenham, TX 77833

Tom Green County Courthouse
113 W Beauregard
San Angelo, TX 76901

Webb County Courthouse
1000 Houston, 3rd Floor
Laredo, TX 78040

Upshur County Courthouse, 3rd Floor
PO Box 730
Gilmer, TX 75644

Wheeler County Courthouse
401 S Main St
Wheeler, TX 79096

Upton County Courthouse
P.O. Box 482
Rankin, TX 79778

Wilbarger County Courthouse
1700 Wilbarger Street Room 12
Vernon, TX 76384

Van Zandt County Courthouse
121 E. Dallas St., Suite 206
Canton, TX 75103

Wilson County Courthouse
1420 3rd St. Ste. 101
Floresville, TX 78114

Systemic Complaint Facts

Between January 2019 and January 2020, DRTx surveyed the county voting websites of all Texas counties to determine the accessibility of the website to people with visual impairments who use screen reading software. At the conclusion of the review, DRTx compiled a report about the accessibility of Texas county voting websites. The survey and report had four primary goals:

1. Explain the critical importance of website accessibility to voters with disabilities in Texas;
2. Explain the counties' legal obligation to provide accessible websites;
3. Determine the current state of county election website accessibility; and
4. Direct counties to improve the accessibility of their election websites to voters with disabilities.

The survey looked at several key elements of website accessibility, guided by Web Content Accessibility Guidelines (WCAG). WCAG provides guidelines for how to achieve website accessibility. According to WCAG, website content must be:

A. Perceivable - This relates to helping people to see and hear web content whether in a browser or using a screen reader or other assistive technologies;

B. Operable - Providing web users with disabilities the ability to interact with website content using a keyboard, mouse or other helping device;

C. Understandable - Meaning the content is clear; and

D. Robust - Meaning the web content can be accessed by a wide range of technologies.

These guidelines are issued by the Web Accessibility Initiative of the World Wide Web Consortium. Using WCAG as a guide, DRTx developed its own tool to gauge website accessibility for people who have visual impairments and use screen reading software.

Our survey revealed that the named county voting websites lack both critical voting information and accessible features, which results in people with disabilities failing to receive the same voting information that people without disabilities receive. As our report explains, websites must be designed in a way to make sure people with disabilities, including visual impairments, can access them. Many people with visual impairments use screen-reading technology to access web content and websites must be designed in a way to be accessible to those voters who use screen-readers. County voting websites contain critical information for voters, including polling locations and hours. In light of COVID-19 and changing voter information, it is now especially important that *all* voters have equal access to voting information on county voting websites.

But the named counties' voting websites are not designed in a way to be accessible to blind users. This means blind website users do not have equal access to the website or the voting information. This is a violation of Title II of the ADA and Section 504.

DRTx contacted the county judge of each named county regarding our survey and report. We provided a copy of the report and the county's individualized results from our website assessment. We told the county that the website was not accessible and requested that they respond. We provided a deadline for a response. For the response, we simply asked that the county provide us with acknowledgment of the letter and let us know the steps the county was going to take to ensure future appropriate and compliant website information, including when these improvements would be completed. The deadline to provide a response was August 7, 2020. DRTx has not received any form of communication from the named counties. Given that these counties' election websites are currently inaccessible to blind users and the counties have no apparent plan to improve their websites, DRTx and REV UP are seeking enforcement through the Department of Justice's ADA complaint process.

Specific County Examples

Although this systemic complaint is against all 83 counties in Texas without an accessible election website, here are a few particularly egregious examples of ADA Title II and Section 504 accessibility violations:

1. Webb County has been on the radar of voting rights groups for many years. This office has a sullied history of dealing with lawsuits; has recently begun to publicize their 'new' institution of curbside voting, and recently caught our attention due to a lack of website inaccessibility. On January 21, 2020 inspection, DRTx staff found a large number of accessibility barriers and noted that "this county website provides no voting information other than notices and sample ballots in PDF format". The website had nine different links to inaccessible PDF documents, and some of these documents included critical information on polling site locations, which means blind voters were unable to access the most critical information. Another outstanding barrier was the lack of alternative text or captioning for a video and two pictures on the main webpage. This website did not meet any of the WCAG guidelines found in Perceivable, Keyboard Accessible, Understandable, and Robust sections.

2. Another county that has a history with the Department of Justice and has failed to provide website accessibility to its citizens is Nueces County. DRTx has a history of working with the Nueces County elections office to assist them with fixing ADA non-compliant polling sites. The office, however, has been generally non-responsive to our follow up contacts in regards to fixing reported barriers. On October 29, 2019 our staff reviewed the Nueces County elections website and found the website as “providing notices and sample ballots in PDF, and redirecting users to votetx.gov for all other information. Additionally, the heading style of the page and lack of viable navigation makes it a difficult page to navigate” with screen reader technology. Upon further inspection, it was noted that there were close to 222 errors; 219 of those errors were empty headings. This website did not meet any of the WCAG guidelines found in Perceivable, Keyboard Accessible, Understandable, and Robust sections.
3. Hardin County is in southeast Texas and has a population of 57, 602. Of that population close to 39,000 individuals are registered to vote. On September 11, 2019, DRTx staff surveyed the Hardin County elections website and summarized their findings as “provides a single page information, providing only polling place locations in a badly formatted list with headings for each item and contact information.” There appears to be eleven total accessibility errors (three images missing alternative text, eight empty headings) and ten PDF links. This website did not meet any of the WCAG guidelines found in Perceivable, Keyboard Accessible, Understandable, and Robust selections.

ADA Title II and Section 504 Claims

The ADA (42 U.S.C. §§ 12101, *et seq.*) is a comprehensive civil rights law enacted to provide “a clear and comprehensive national mandate for the elimination of discrimination” against individuals with disabilities. 42 U.S.C. § 12101(b)(1). Individuals who are blind and cannot access the websites their county election office are being discriminated on the basis of disability and are missing out on critical voter information that is offered to sighted individuals.

Title II of the ADA applies to any “public entity,” 42 U.S.C. § 12132, which is defined to include any state or local government, and any of their departments, agencies, or instrumentalities. 42 U.S.C. § 12131(1). County election offices fall under the public entity provision of the ADA. Title II also provides that “no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.” 42 U.S.C. § 12132. As a program or activity of a state or local entity, county election websites are covered by Title II of the ADA and thus, cannot exclude people with disabilities.

The ADA prohibits state and local governments from discriminating against people with disabilities. Counties may not “deny a qualified individual with a disability the opportunity to participate in or benefit from the aid, benefit, or service” and may not “afford a qualified individual with a disability an opportunity to participate in or benefit from an aid, benefit, or service that is not equal to that afforded others.” C.F.R. 28 § 35.130(b)(ii) and (iii). Further, Title II of the ADA requires public entities to take appropriate steps to ensure that communication with people with disabilities is as effective as communication with others.” 28 C.F.R. § 35.160(a)(1). These provisions require making county websites accessible so that individuals with disabilities can access them in the same manner as individuals without disabilities.

Courts have ordered accessible voting websites in various ADA litigation. See *Hindel v. Husted*, No. 2:15-CV-3061, 2017 WL 432839 (S.D. Ohio Feb. 1, 2017); *Eason v. New York State Board of Elections*, No. 16-CV-4292 (KBF), 2017 WL 6514837 (S.D.N.Y. Dec. 20, 2017). Likewise, Section 504 requires that entities receiving federal funding (including counties and state governments) ensure equal access to their programs and activities. 29 U.S.C. § 794, *et seq.* This provision also requires county voting websites be accessible to users with disabilities.

Conclusion

We respectfully request that the Department of Justice investigate this case of disability discrimination and denial of reasonable accommodation claim. Thank you for your prompt attention to this matter. If you have any further questions or need any further information regarding this complaint, please contact me at 512-407-2762 or ldavis@drtx.org.

Respectfully,

/s/ Lia S. Davis

Lia S. Davis

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Exhibit A



Web Failures:

How County Voting Websites Leave

Voters with Disabilities in the Dark

An Accessibility Review of

Texas County Election Websites

by Disability Rights Texas

July 10, 2020

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Web Failures:

How County Voting Websites Leave Voters with Disabilities in the Dark

INTRODUCTION

About Disability Rights Texas and the PAVA Program

Disability Rights Texas (DRTx) is Texas' designated Protection and Advocacy agency. We provide a wide range of services for people with disabilities, including training, education, and direct legal advocacy. One of the programs administered by DRTx is the Protection and Advocacy for Voting Access (PAVA) program¹. The PAVA program is funded under the Help America Vote Act (HAVA) grant which was established following the 2000 Presidential election and signed into law in October 2002. HAVA mandates that persons with disabilities be given full access to the polls and to private ballots.

The goal of PAVA is to ensure full participation in all aspects of the voting process for people with disabilities, including registering to vote, casting ballots, and accessing polling places. Separately, DRTx litigates cases against entities for failing to provide equal access to individuals with disabilities, including litigating cases against state and county governments that fail to provide equal access to voting.

¹ 42 USC §15461-62, P.L. 107-252

Voting Access for People with Disabilities

Access to the voting process is a fundamental right. However, voters with disabilities experience greater barriers to voting than the rest of the population. People with disabilities experience challenges with voting because of barriers in transportation, communication, physical access, or registration. Counties must ease some of these barriers by maximizing voter information online. Counties need to ensure their voting websites are both accessible and contain appropriate voter information. Between January 2019 and January 2020, DRTx conducted an extensive review of county election websites to evaluate them for content and accessibility. We wanted to measure how effectively counties are ensuring equal participation in the voting process to their voters with disabilities. We learned that while some Texas counties were performing well, the great majority of them were failing to provide equal access to voters with disabilities, effectively shutting them out of civic participation.

Purposes of Our Review

This website review was conducted from January 2019 through January 2020. The primary purposes of the review were:

1. Explain the critical importance of website accessibility to voters with disabilities in Texas;
2. Explain the counties' legal obligation to provide accessible websites;
3. Determine the current state of county election website accessibility; and
4. Direct counties to improve the accessibility of their election websites to voters with disabilities.

In March 2020, there were 16,211,198 registered voters in Texas. An estimated 1.2 million of these voters have a disability. Voters with disabilities, just like voters without disabilities, often have questions about election information (e.g. where to vote, who the candidates are, how to register, etc.). Given the ease and efficiency of using the internet, many voters turn to county election websites to research information about voting and elections. According to the U.S. Census, nearly 80% of Texas homes (approximately 8.7 million) have an internet subscription.²

Disability Rights Texas receives numerous inquiries from state and county election officials as well as private citizens regarding the accessibility status of voting websites. We have received complaints against counties that have generally inaccessible websites; complaints that PDF sample ballots and other documents are not readable; complaints that some county websites are not using person first language; whether there are any screen readers that will read banners; if a particular icon would be accessible for screen readers; and what is the most disability-friendly/comprehensive language to use on a website. These questions illustrate that there is both a deficit of accessible websites and guidance on how to resolve the inaccessibility issues. These barriers need to be addressed so that the disability community of Texas may exercise their right to access voting information and participate in civic engagement.

WHAT IS WEBSITE ACCESSIBILITY?

Website accessibility refers to the websites, tools, and technologies designed and developed so people with disabilities can use them. These tools allow people to

² [US Census webpage, percentages of homes with internet](https://www.census.gov/quickfacts/fact/table/TX,US/DIS010218)
URL: <https://www.census.gov/quickfacts/fact/table/TX,US/DIS010218>

understand, navigate, perceive, contribute, and interact with the web and encompasses all disabilities that affect access to the web (i.e., cognitive, auditory, visual, physical, speech, and neurological).³

Importance of Website Accessibility to People with Disabilities

In short, website accessibility means making the internet accessible to people with disabilities. The internet has the capacity to serve as an equalizer, giving everyone access to the same information at the same time. But in order for the internet to be this type of equalizer, websites must be accessible to all users, including those with disabilities. The internet is a critical resource in our society for education, employment, health care, commerce and recreation. If a website is not accessible, it excludes individuals with disabilities from accessing the same opportunities as others. Just as physical access is required for people to have equal access to public and private spaces, web access is required for people with disabilities to access the internet.

Furthermore, the internet provides an opportunity for people with disabilities to engage and interact with society in a way that may be more difficult or impossible to do in-person. Websites can provide information to everyone, not just people with disabilities, in a more efficient and clear way. As an example, a county website can provide information about voting, including polling locations, and individuals may access this information from anywhere in the world at any time of day. This is more efficient than posting the information on a bulletin board in a county building which would not

³ [Web Accessibility Initiative: Introduction to Website Accessibility](https://www.w3.org/WAI/fundamentals/accessibility-intro/)
URL: <https://www.w3.org/WAI/fundamentals/accessibility-intro/>

only be difficult to access for everyone, it could also be impossible for certain people with disabilities to access at all.

Importance of Accessible County Voting Websites

The importance of accessible county voting websites has become especially relevant in light of COVID-19. Websites are more important than ever given the ever-changing and new information regarding voting under COVID-19. Among these changes, election days have been rescheduled and polling locations have been moved. In addition, accessing information online allows people to practice social distancing. This is especially important for those who are at particular risk of COVID-19. Now more than ever, it is critical that websites be accessible so that everyone can access the most current information about voting in their county.

Web accessibility impacts people with all types of disabilities, which is one of the reasons why it is so critical that counties ensure their websites are accessible. These disabilities include: visual, cognitive, reading comprehension, auditory, physical, and speech. Examples of the way in which users with various disabilities may use a website include:

- A website user who is blind will typically rely on screen reader software to access the information on a webpage. The screen reader software reads the information on the page aloud so that the user can hear the information provided. When accessing web content, the screen reader outputs information from the web page in an audio format, including headings, links, lists, and tables. This makes the web page easier to navigate. If a website is not designed properly, then the

information will not be read aloud and the user will not be able to access it. The user may also get “stuck” on the page if the screen reader has nowhere to move or read as a result of inaccessible web design.

- A website user with low vision (limited vision) may use a screen magnification software to enlarge the images and text on the screen. Essentially, the software zooms in on text or images to make it large enough to be readable to the user, but if the website is not properly designed, it can be difficult or impossible to find the content on the page once zoomed in.
- A website user with limited use of his or her arms, hands, or fingers will typically require that a website be navigable via the use of keyboard commands instead of a mouse. Web forms should have keyboard equivalents, and content should be able to be skipped or navigated without using too many keyboard commands.
- A website user who is deaf will typically require captioned or ASL interpreted audio content. This would allow someone who is deaf to access the same information as a hearing person, just in a different format.
- A website user with a cognitive or learning disability may require various web access tools. Website language should be simple and straightforward and the website layout should be consistently organized to aid in navigation. Further, graphics can help make the website easier to navigate for individuals with cognitive, learning, or reading disabilities.

In order to make its website accessible, a county must consider web accessibility from the beginning. This means accessibility should be considered as the county is building or making changes to its voting website. Making a website accessible does not

have to be costly and should be done when the county is creating the website content. Nevertheless, there are many options to make a website retroactively accessible if it was not initially created with accessibility in mind.

Guidelines for Website Accessibility

Web Content Accessibility Guidelines (WCAG) provide guidelines for how to achieve website accessibility. These guidelines are issued by the Web Accessibility Initiative of the World Wide Web Consortium.

According to WCAG, web content must be:

- A. Perceivable** - This relates to helping people to see and hear web content whether in a browser or using a screen reader or other assistive technologies;
- B. Operable** - Providing web users with disabilities the ability to interact with website content using a keyboard, mouse or other helping device;
- C. Understandable** - Meaning the content is clear; and
- D. Robust** - Meaning the web content can be accessed by a wide range of technologies.

The most current version is WCAG Level 2.1 AAA and provides guidance on website creation. The following guidelines are general best practice guidelines for website accessibility, but also contain more specific guidance taken directly from WCAG Level 2.1 AAA.

- Including alternative text to describe non-textual content, such as images, which is required for effective screen reading;

- Structuring documents so they can be easily navigated both by keyboard and mouse;
- Using the proper markup for tables so that screen readers can understand them
- and forms must be properly coded to be read by screen readers;
- Making it easy for people to fill out forms and understand them by including the correct labels for all form elements;
- Using links that make sense and are descriptive (in other words avoiding links that are only labeled "click here");
- Avoid using spatial descriptions for navigation. For example, do not say, "click to your right"
- Structuring pages so users can easily move around the screen;
- Avoid posting scanned documents as many scanned documents are impossible to read using a screen reader;
- Be cautious with dynamic content (content that changes based on the behavior, preferences, and interests of the web user) as much of it may not be readable by screen readers;
- Caption all videos or audio content;
- Making sure that the page design does not rely on color for meaning, and use high color contrasts for users with visual impairments;
- Keeping content clear and easy to understand and displayed using easy read fonts and appropriate heading styles; and
- Using semantic markup to identify different content elements⁴.

⁴ Semantic markup: a type of code used to convey the meaning of a webpage, rather than just a description of appearance. This makes it easier to distinguish between different types of data.

LEGAL REQUIREMENTS FOR WEBSITE ACCESSIBILITY

Requirements under the ADA

Not only is web accessibility the right thing to do from an inclusivity perspective, it is also **required** by anti-discrimination laws. The Americans with Disabilities Act (ADA) prohibits state and local governments from discriminating against people with disabilities. Counties may not “deny a qualified individual with a disability the opportunity to participate in or benefit from the aid, benefit, or service” and may not “afford a qualified individual with a disability an opportunity to participate in or benefit from an aid, benefit, or service that is not equal to that afforded others.”⁵ Further, Title II of the ADA requires public entities to take appropriate steps to ensure that communication with people with disabilities is as effective as communication with others.⁶ These provisions require making county websites accessible so that individuals with disabilities can access them in the same manner as individuals without disabilities.⁷ Likewise, Section 504 of the Rehabilitation Act (“Section 504”) requires that entities receiving federal funding (including counties and state governments) ensure equal access to their programs and activities.⁸ This provision also requires county voting websites be accessible to users with disabilities.

⁵ C.F.R. 28 § 35.130(b)(ii) and (iii)

⁶ 28 CFR §§ 35.130, 35.160 (a)(1)

⁷ Courts have ordered accessible voting websites in various ADA litigation. See *Hindel v. Husted*, No. 2:15-CV-3061, 2017 WL 432839 (S.D. Ohio Feb. 1, 2017); *Eason v. New York State Board of Elections*, No. 16-CV-4292 (KBF), 2017 WL 6514837 (S.D.N.Y. Dec. 20, 2017).

⁸ 29 U.S.C. § 794 *et seq*

Requirements under Section 508

Section 508 of the Rehabilitation Act (Section 508) provides requirements for website accessibility for federal programs. This provision was first developed in 1998 and includes 16 standards for web-based information and applications. Given that Section 508 was introduced at a time when websites were less complex than they are now, Section 508 accessibility is not comprehensive. A website can be Section 508 compliant but still partially inaccessible. Section 508 is currently being updated to reflect the most current accessibility standards. Nevertheless, Section 508 can still be a useful tool for gauging website accessibility which we discuss later in this paper.

Requirements under Texas Election Code

The Texas Election Code has various statutory requirements regarding the election information counties are required to post. Among other things, counties are required to post on their election website, the locations of each polling site at least 21 days before an election.⁹ Our survey included an evaluation of the county's compliance with this provision of the Texas Election Code.¹⁰

DRTx regularly litigates cases against entities for ADA and Section 504 violations. Failure to provide equal access to individuals with disabilities is illegal, unacceptable and unconscionable, especially since achieving equal access in the

⁹ Texas Election Code § 4.003(b)

¹⁰ For additional information about the adequacy of the general voting information contained on county voting websites, see [The League of Women Voters of Texas 2020 Texas Primary County Election Website Review](https://tinyurl.com/LWVT2020WebReview).
URL: <https://tinyurl.com/LWVT2020WebReview>

context of websites is a straightforward task. Counties must take steps to comply with applicable anti-discrimination laws.

ACCESSIBILITY EVALUATIONS—METHODS AND RESULTS

During the time period of January 2019-January 2020, the Disability Rights Texas PAVA team evaluated all 254 county websites to determine if there is specific elections department information for each county, if that information was accessible (via screen reader), and if any disability-specific information was provided.

CESAR Survey Tool

The team used a survey tool based upon the WCAG 2.0 and Section 508 guidelines. We surveyed the four sections of web content plus a fifth section focusing on “voter information.” The “voter information” section focused on the website providing information on mail-in-ballots, curbside voting, sample ballots, ability to use an American Sign Language (ASL) interpreter, and what type of accommodation tools were available for the voter.

We conducted an evaluation of each county website using an assessment tool we created called the Comprehensive Elections Site Accessibility Rater (CESAR). CESAR assesses key pieces of information on county election websites. It assesses both accessibility of the website’s content and the content itself. We checked the election websites to ensure compliance with WCAG 2.0 and Section 508 web accessibility standards, and also the new Texas Election Code requirements that mandate the election information (including polling location) are provided on the

county's website. CESAR uses a scale between 0 to 67 points, later scaled to a percentage, to grade each site on its accessibility and voting information provided.

Reviewers Included People with Disabilities

Multiple people with various abilities of vision, dexterity, technical awareness, etc., reviewed the county websites. To assist those with visual impairments, testers used Job Access with Speech (JAWS) 2019. JAWS is a software program that enables a blind or visually impaired user to read the text on the computer screen with a speech synthesizer or braille display.

We conducted assessments of each county's actual election-related website. We did not evaluate the county's home page, though we often had to navigate from the county's home page to the county's election page.

Summary of Survey Results

Through our evaluations, we found websites of every level of compliance. Some websites met all of the accessibility standards and also provided appropriate amounts of disability related voter information. But the majority of websites failed to achieve any level of accessibility, effectively shutting the door on voters with disabilities seeking the same access as voters without disabilities. Some website links were no longer valid, and instead the county sponsored websites redirected to the Facebook accounts of county election departments. Some of the county websites were simply non-existent. These evaluations revealed that county election websites across Texas are rampantly discriminating against people with disabilities by failing to provide accessible websites.

The scoring results ranged from zero to ninety-two. For a full explanation of the scoring schematic, please email a request to our [voting rights staff](#) at vote@drtx.org.

For a county to score above 90 percent, its website must have included all election related information for voters (sample ballots,¹¹ curbside voting,¹² ballot-by-mail,¹³ right to interpreters,¹⁴ and use of voting machine auxiliaries¹⁵) in a fully accessible manner according to our score. Scores of mid-to-high percentages of 80 required meeting satisfaction in all four areas of the survey and including a majority of the voter information section.

RESULTS

Top Counties:

The ten counties that scored highest on the assessment were Cameron (92%), Gray (89%), Harris (84%), Hays (87%), Houston (83%), Lavaca (83%), McLennan (89%), Moore (84%), Orange (83%), Tarrant (86%), and Travis (92%).

A closer study of the top ten county websites revealed certain commonalities in the types of information offered and level of website accessibility. With the exception of

¹¹ Sample ballots are sample paper or electronic copies of the ballot the voter will be eligible to cast.

¹² A voter with a disability can request curbside voting. Curbside voting is required to be available at each polling location. Each polling site should have a mobile voting station that can be moved outside to allow a voter with a disability to vote curbside from their car or the sidewalk.

¹³ Ballot-by-mail provides mail-in voting for people with disabilities, people over 65, and people who will be out of the county during voting.

¹⁴ The right to interpreters gives people who are deaf or hard of hearing the right to request sign language interpreters at the polling site if needed for effective communication.

¹⁵ Voting machine auxiliaries are any sort of aid or device that assists a voter with a disability to vote using the voting machine.

two to three counties scoring “not applicable” and “supports with exceptions,” all ten counties supported the sections of Perceivable, Operable, Understandable, and Robust.

Regarding the Voter Information section, all ten counties had a text file for their election website; a text file mentioning a sample ballot (even if the sample ballot itself was not fully accessible); and information on Ballot-By-Mail. Eight out of the ten county websites had information about disability exemption of voter ID, and links to the [Secretary of State's website](https://www.votetexas.gov/) at [votetexas.gov/](https://www.votetexas.gov/). Seven out of ten county websites mentioned a voter's right to interpreters, use of headphones, and curbside voting. Six out of the ten counties had information posted about the right to use and availability of an accessible voting machine, or as they are also known, a Digital Recording Device (DRE).

Mid-Range Counties:

Thirteen counties scored within the 51-75% range and 33 counties scored within the 75-100% range. While these county websites still need a lot of work to achieve improved accessibility, they fared better than the majority of counties in Texas.

Most Counties Failed to Achieve a Score Above 50%

We found 56 Texas counties that earned a score of zero - meaning there is no website at all. Further breakdown of the accessible website evaluation found that 104 counties scored within a range of 1-25%. 35 counties scored within the 26-50% range. In summary, what our assessment discovered is that close to 200 of Texas' 254 counties did not meet the standards that are required to achieve equal access and website accessibility. That means nearly 200 counties are denying voters with

disabilities an equal chance to learn voting information so that they can exercise their voting rights.

Of the 139 counties that scored between 1 and 50 percent, only seven to nine counties registered any form of support for the P1-P4 sections of the assessment. This further shows that only about 130 counties, more than half of all Texas counties, met very little of the accessibility guidelines listed on our check sheet.

Given the huge number and such pervasive lack of accessibility, it is nearly impossible to list all of the deficiencies found within all 130 counties. We can report that none of the counties provided information about voting machine accessories (sip-and-puff devices, jellies) and the general accessibility features of the county's chosen voting machine.

For a comprehensive list of the website accessibility scoring schematic, the website information reviewed in our survey, or the itemized results for individual counties, please email our [voting rights staff](#) at vote@drtx.org.

RECOMMENDATIONS

Since 2020 is an election year, we conducted this study to highlight the urgent need for full website accessibility for all voters in Texas, including those with disabilities. The COVID-19 pandemic has made this need even more urgent as Texans with disabilities are relying on web-based information now more than ever.

County leadership across Texas must act now to achieve fully accessible online information prior to elections in November. Counties should immediately begin web

accessibility improvements by using several free or low-cost online tools to assist with checking a website's accessibility.¹⁶

Specifically, DRTx strongly urges that counties take the following measures by September 1, 2020 in anticipation of the November 2020 election:

Survey Review

Counties must immediately review the complete results of the survey of their county website and remove any and all current online barriers to accessibility.

Website Audit

Counties must complete a thorough audit of existing online content and functionality by an auditor who has the requisite knowledge and experience to audit content and functionality. The audit should identify barriers to access on the existing website for people with disabilities.

Website Accessibility Plan and Policies

Counties must develop a plan for the improvement and maintenance of accessibility of their websites. This plan should include a designated person or group of people responsible for the accessibility of the website, and policies and procedures ensuring that all newly added or modified online content and functionality will be accessible to people with disabilities.

¹⁶ National Council on Independent Living, [Achieving Accessibility for Election Websites and Sample Ballots: A Toolkit for Disability Advocates](https://ncil.org/votingrights/sample-ballot-toolkit/)

URL: <https://ncil.org/votingrights/sample-ballot-toolkit/>

Policies and Procedures

Counties must adopt policies and procedures to ensure that all newly added or modified online content and functionality will be accessible to people with disabilities.

Redesign with Accessibility in Mind

Counties planning to undergo a website redesign must do so with accessibility in mind. This includes ensuring that a text-only mode is available. Website redesign often includes planning for responsive design. Having responsive design means that the website will accommodate different website templates, different technologies (including computers, smart phones and tablets), and that content and functions available using one of the technologies are also available on the other types.

Staff Training

Counties must also incorporate in their planning a means of ensuring that in-house staff and contractors responsible for web page and content development are properly trained on accessibility requirements.

Periodic User Testing

Counties should regularly enlist the help of disability groups to test web pages for accessibility compliance and use the feedback they provide to increase the accessibility of their websites. If requested, DRTx will advise counties of the documented errors found on their website(s) during our assessment.

Online Notice

Counties must provide a way for voters to request information about website content that is currently inaccessible by posting a telephone number or email address on their home page. They should also establish procedures that ensure a quick response to users with disabilities who are trying to obtain information or services in this way.

Color and Font Settings

A county's website design should allow the person accessing the website to view it in the color and font sizes the viewer chooses. Voters with low vision must be able to specify the text and background colors as well as the font sizes needed to see webpage content.

Audio Descriptions and Captions

Videos must incorporate features that make them accessible to everyone. Websites should provide audio descriptions of images (including changes in setting, gestures, and other details) to make videos accessible to people who are blind or have low vision. Text captions should be synchronized with the video images to make videos and audio tracks accessible to people who are deaf or hard of hearing.

Forms and Tables

If a county website contains online forms and tables, counties must make those elements accessible by labeling each control (including buttons, check boxes, drop-down menus, and text fields) with a descriptive HTML tag.

PDF Documents

If a county website uses Portable Document Format (PDF), or other image-based formats, the county should also post the document in an alternative text-based format, such as HTML or RTF (Rich Text Format), in addition to PDF. Text-based formats are the most compatible with assistive technologies.

Alternative Ways to Access Information

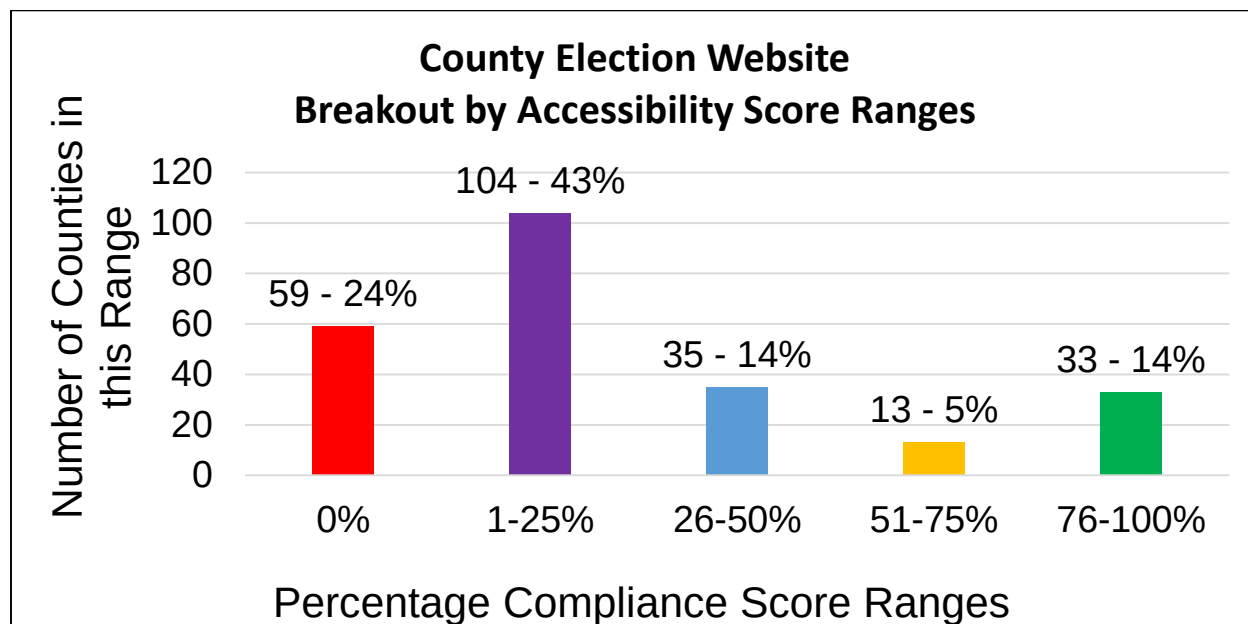
Counties must ensure that there are alternative ways for people with disabilities to access the information and services that are provided on its website. Some voters may not have, or be able to use a computer or have access to the internet.

CONCLUSION

Texas is facing unprecedented challenges during the 2020 election cycle. Providing equal access and opportunity to the voting process is a fundamental right of all citizens, protected by the laws of our country and state. The measures outlined in this report will help ensure that voters with disabilities have access to the same voting information to which all other Texans have access. Voters in Texas with disabilities demand that their vote be counted and need to be heard like any other voter in Texas. Texas county election officials must act urgently and step up on behalf of all voters with disabilities to ensure that their vote and their voice will be heard in 2020 and beyond.

APPENDIX

County Election Website Accessibility Scores Overview



Data table for preceeding chart:

County Election Website Score Percentage	Number of Counties Scoring in this Range	Percentage of Counties in this Score Range
0%	59	24%
1-25%	104	43%
26-50%	35	14%
51-75%	13	5%
76-100%	33	14%

Accessibility Resources

1. National Council on Independent Living (NCIL), [Achieving Accessibility for Election Websites and Sample Ballots: A Toolkit for Disability Advocates](#)

URL: <https://ncil.org/votingrights/sample-ballot-toolkit/>

2. National Federation for the Blind, [Center of Excellence in Non-Visual Access](#)

URL: <https://www.nfb.org/programs-services/center-excellence-nonvisual-access>

A concentrated center of expertise, best practices, and resources that enables businesses, government, and educational institutions to more effectively provide accessible information and services to the blind community.

3. [WAVE Web Accessibility Evaluation Tool](#)

URL: <https://wave.webaim.org/>

A free online tool will evaluate and show the examined web page with access issues flagged and offer information on how to fix those issues.

4. [WebAIM](#) (Web Accessibility In Mind)

URL: <https://webaim.org/> and <https://webaim.org/resources/>

A non-profit organization based at the Center for Persons with Disabilities at Utah State University that provides comprehensive web accessibility solutions since 1999. Several services and [resources are offered through WebAIM](#).

5. [Section 508, Test for Accessibility](#)

URL: <https://www.section508.gov/test>

A free tool that allows users to check their website's compliance to Section 508.

6. [Texas Secretary of State Elections Website](http://www.votetexas.gov/)

URL: <http://www.votetexas.gov/>

State website that provides information on various voting related deadlines, links to Ballot-By-Mail applications, guidelines on various voting eligibility requirements.

County Website Scores

County	Total Score	Percent
Anderson	28	42%
Andrews	24	36%
Angelina	41	60%
Aransas	28	42%
Archer	12	17%
Armstrong	26	39%
Atascosa	11	16%
Austin	2	2%
Bailey	1	1%
Bandera	20	30%
Bastrop	33	49%
Baylor	0	0%
Bee	44	66%
Bell	35	51%
Bexar	44	66%
Blanco	29	43%
Borden	14	20%
Bosque	40	60%
Bowie	15	22%
Brazoria	13	19%
Brazos	52	78%
Brewster	48	72%
Briscoe	37	55%
Brooks	10	15%
Brown	52	77%
Burleson	34	51%
Burnet	11	16%
Caldwell	49	73%
Calhoun	41	61%
Callahan	34	51%
Cameron	62	92%
Camp	10	15%
Carson	11	16%
Cass	0	0%
Castro	1	1%
Chambers	51	75%

County	Total Score	Percent
Cherokee	1	1%
Childress	0	0%
Clay	1	1%
Cochran	12	17%
Coke	11	16%
Coleman	13	19%
Collin	54	81%
Collingsworth	0	0%
Colorado	12	18%
Comal	0	0%
Comanche	0	0%
Concho	0	0%
Cooke	0	0%
Coryell	0	0%
Cottle	0	0%
Crane	0	0%
Crockett	0	0%
Crosby	0	0%
Culberson	0	0%
Dallam	52	77%
Dallas	53	79%
Dawson	0	0%
De Witt	0	0%
Deaf Smith	0	0%
Delta	0	0%
Denton	54	81%
Dickens	0	0%
Dimmit	0	0%
Donley	0	0%
Duval	0	0%
Eastland	0	0%
Ector	0	0%
Edwards	52	78%
El Paso	52	78%
Ellis	0	0%
Erath	0	0%
Falls	0	0%
Fannin	0	0%

County	Total Score	Percent
Fayette	0	0%
Fisher	0	0%
Floyd	0	0%
Foard	0	0%
Fort Bend	53	78%
Franklin	0	0%
Freestone	0	0%
Frio	50	75%
Gaines	0	0%
Galveston	0	0%
Garza	0	0%
Gillespie	0	0%
Glasscock	0	0%
Goliad	0	0%
Gonzales	55	81%
Gray	60	89%
Grayson	52	78%
Gregg	54	80%
Grimes	51	76%
Guadalupe	54	80%
Hale	10	15%
Hall	10	15%
Hamilton	13	19%
Hansford	11	16%
Hardeman	10	15%
Hardin	11	16%
Harris	57	84%
Harrison	53	78%
Hartley	11	16%
Haskell	10	15%
Hays	59	87%
Hemphill	21	31%
Henderson	0	0%
Hidalgo	12	17%
Hill	1	1%
Hockley	11	16%
Hood	53	79%
Hopkins	11	16%

County	Total Score	Percent
Houston	56	83%
Howard	11	16%
Hudspeth	10	15%
Hunt	1	1%
Hutchinson	11	16%
Irion	0	0%
Jack	0	0%
Jackson	0	0%
Jasper	11	16%
Jeff Davis	10	15%
Jefferson	0	0%
Jim Hogg	10	15%
Jim Wells	11	16%
Johnson	0	0%
Jones	12	18%
Karnes	51	76%
Kaufman	12	17%
Kendall	54	80%
Kenedy	11	16%
Kent	16	24%
Kerr	42	63%
Kimble	11	16%
King	0	0%
Kinney	11	16%
Kleberg	12	18%
Knox	11	16%
La Salle	11	16%
Lamar	14	20%
Lamb	10	15%
Lampasas	10	15%
Lavaca	56	83%
Lee	10	15%
Leon	11	16%
Liberty	11	16%
Limestone	0	0%
Lipscomb	0	0%
Live Oak	0	0%
Llano	54	80%

County	Total Score	Percent
Loving	0	0%
Lubbock	48	71%
Lynn	10	15%
Madison	17	25%
Marion	18	27%
Martin	19	28%
Mason	11	16%
Matagorda	15	22%
Maverick	0	0%
McCulloch	11	16%
McLennan	60	89%
McMullen	10	15%
Medina	17	25%
Menard	11	16%
Midland	15	22%
Milam	15	22%
Mills	13	19%
Mitchell	1	1%
Montague	11	16%
Montgomery	53	78%
Moore	56	84%
Morris	17	25%
Motley	12	17%
Nacogdoches	53	78%
Navarro	10	15%
Newton	17	25%
Nolan	17	25%
Nueces	18	27%
Ochiltree	16	24%
Oldham	18	27%
Orange	56	83%
Palo Pinto	18	26%
Panola	11	16%
Parker	13	19%
Parmer	18	27%
Pecos	18	26%
Polk	12	18%
Potter	54	81%

County	Total Score	Percent
Presidio	11	16%
Rains	12	18%
Randall	0	0%
Reagan	11	16%
Real	0	0%
Red River	18	26%
Reeves	0	0%
Refugio	10	15%
Roberts	0	0%
Robertson	16	24%
Rockwall	12	18%
Runnels	12	18%
Rusk	12	17%
Sabine	12	18%
San Augustine	17	25%
San Jacinto	19	28%
San Patricio	12	17%
San Saba	18	26%
Schleicher	20	29%
Scurry	13	19%
Shackelford	16	23%
Shelby	11	16%
Sherman	11	16%
Smith	13	19%
Somervell	18	26%
Starr	17	25%
Stephens	10	15%
Sterling	20	29%
Stonewall	19	28%
Sutton	10	15%
Swisher	10	15%
Tarrant	58	86%
Taylor	13	19%
Terrell	10	15%
Terry	19	28%
Throckmorton	10	15%
Titus	18	26%
Tom Green	12	18%

County	Total Score	Percent
Travis	62	92%
Trinity	19	28%
Tyler	0	0%
Upshur	12	18%
Upton	13	19%
Uvalde	0	0%
Val Verde	12	18%
Van Zandt	15	22%
Victoria	18	26%
Walker	12	18%
Waller	20	29%
Ward	18	26%
Washington	14	20%
Webb	13	19%
Wharton	20	29%
Wheeler	10	15%
Wichita	10	15%
Wilbarger	11	16%
Willacy	19	28%
Williamson	10	15%
Wilson	13	19%
Winkler	18	26%
Wise	25	37%
Wood	49	72%
Yoakum	18	26%
Young	19	28%
Zapata	19	28%
Zavala	0	0%

From: Elections Internet
Sent: Wednesday, November 18, 2020 3:23 PM
To: [REDACTED]
Subject: FW: Official Complaint
Attachments: Sherry Russell.pdf

Thank you for contacting the Elections Division of the Office of the Texas Secretary of State.

Attached is a response to your complaint that was submitted to our office regarding your concerns regarding possible election irregularities in Tarrant County.

Again, thank you for contacting our office. If you have any additional questions or if we can be of further assistance, please contact our office at 1.800.252.8386 or email us at Elections@sos.texas.gov.

Elections Division

Office of the Secretary of State
800-252-VOTE(8683)

www.sos.state.tx.us/elections/index.shtml

For Voter Related Information, please visit:



The information contained in this email is intended to provide advice and assistance in election matters per §31.004 of the Texas Election Code. It is not intended to serve as legal advice for any matter. Please review the law yourself, and consult with an attorney when your legal rights are involved.

From: Sherry Echart [REDACTED]
Sent: Tuesday, September 29, 2020 12:08 PM
To: Elections Internet <Elections@sos.texas.gov>
Subject: Official Complaint

CAUTION: This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to informationsecurity@sos.texas.gov.

To Whom It May Concern-

Attached is an official complaint against the Tarrant County Elections Office.

Thank you,
Sherry Russell

Created with [Scanner Pro](#)

The State of Texas



Elections Division
P.O. Box 12060
Austin, Texas 78711-2060
www.sos.state.tx.us

Phone: 512-463-5650
Fax: 512-475-2811
Dial 7-1-1 For Relay Services
(800) 252-VOTE (8683)

Ruth R. Hughs
Secretary of State

November 18, 2020

Sherry Russell
1300 Windmill Ct.
Arlington, Texas 76013
[REDACTED]

Dear Ms. Russell,

This letter is in response to the complaint you submitted to our office regarding possible election irregularities in an election in Tarrant County.

In your complaint you indicated that you received a ballot by mail from Tarrant County in September 2020, but indicated that you had not requested that ballot and that you did not meet the eligibility requirements to vote by mail. You also indicated that you contacted the Tarrant County Elections Office about this issue and that they apologized for the error and cancelled the ballot after discovering the mistake.

After receiving your complaint, we also contacted Tarrant County about this issue, and they confirmed that their office had made a mistake and that they would be addressing the issue internally to ensure that this issue does not reoccur.

Our office does not have any investigative or enforcement authority, and we only have the authority to refer criminal conduct to the Office of the Attorney General when that criminal conduct constitutes a criminal offense under the Election Code. Because your complaint did not include any allegations of criminal conduct under the Election Code, we are unable to refer your complaint at this time.

If you have any further questions, please do not hesitate to contact the Elections Division toll-free at 1-800-252-(VOTE) 8683.

Sincerely,

A handwritten signature in blue ink, appearing to read "Keith Ingram".

Keith Ingram

Director of Elections

KI:CP

Cc: Heider Garcia
Elections Administrator
Tarrant County Elections
2700 Premier St.
Fort Worth, TX 76111

From: Elections Internet
Sent: Wednesday, October 7, 2020 2:25 PM
To: [REDACTED]
Subject: FW: Regarding "So Much Crooked In Elections In Texas And U.S.A."

Thank you for contacting the Elections Division of the Office of the Texas Secretary of State.

Any person who believes that a criminal violation of the Code has occurred may file [a complaint](#). In order to initiate the complaint process, a written and signed complaint must be filed with the Secretary of State. The complaint must allege the violation with particularity, identify the person(s) or entity responsible for the alleged violation, and contain a reference to the section of the Code alleged to have been criminally violated, if known.

Pursuant to Section 31.006 of the Texas Election Code (the "Code"), the Office of the Secretary of State (the "Secretary of State") has the ability to refer elections complaints to the Office of the Attorney General (the "Attorney General"). If, after receiving a complaint alleging criminal conduct in connection with an election, the Secretary of State determines that there is reasonable cause to suspect that the alleged criminal conduct occurred, the Secretary of State shall promptly refer the complaint to the Attorney General. The Secretary of State shall deliver to the Attorney General all pertinent documents in the Secretary of State's possession.

Again, thank you for contacting our office. If you have any additional questions or if we can be of further assistance, please contact our office at 1.800.252.8683 or email us at Elections@sos.texas.gov.

Elections Division Staff
Office of the Texas Secretary of State
1019 Brazos Street | Rudder Building, 2nd Floor | Austin, Texas 78701
1.800.252.VOTE (8683)

elections@sos.texas.gov | www.sos.state.tx.us

or Voter Related Information, please visit:



The information contained in this email is intended to provide advice and assistance in election matters per §31.004 of the Texas Election Code. It is not intended to serve as a legal opinion for any matter. Please review the law yourself, and consult with an attorney when your legal rights are involved.

From: Donna Brogdon Ryder [REDACTED] >
Sent: Tuesday, October 6, 2020 6:39 PM
To: [REDACTED]; Rangers <rangers@dps.texas.gov>; ken.paxton@oag.texas.gov; Elections Internet <Elections@sos.texas.gov>; fjec@cornyn.senate.gov; Voting Section (CRT) <voting.section@usdoj.gov>; ICEOPRIntake <iceoprintake@ice.dhs.gov>
Subject: Regarding "So Much Crooked In Elections In Texas And U.S.A."

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October 6, 2020

RE: Regarding "So Much Crooked In Elections In Texas And U.S.A."

I, Donna Jean Brogdon Ryder, want you to know that I witnessed "Voter Fraud" happen in a sheriff's building November, 2018 in Fort Worth, Texas in "Limited Ballot Line," whereby, Tarrant County is "guilty of massive misconducts of everything in the Fort Worth, Texas areas." There "was no I.D. and no voter card asked for by the voter Spanish man." You could be anybody and, even, vote twice. I did "turn" this in to your department as a "Notarized Statement." Where it went from there is a "mystery," for the man named "David" may not have lost his job with my statement of "confirmed voter fraud in Texas."

U. S. Elections Assistance Commission

10/06/2020 I, Donna Brogdon Ryder, United States Citizen, want "to file a complaint" that Former Pres. Barack Obama overstepped his "presidential powers" by E.Orders of DACA, DAPA, &illegal aliens.

New submission added to File a Complaint.

Sincerely,
Donna Brogdon Ryder
Witness For State of Texas
Fort Worth, Texas

[REDACTED]
817-791-7740

From: Elections Internet
Sent: Monday, February 22, 2021 4:12 PM
To: [REDACTED]
Subject: FW: SAO HOTLINE 21-2544

Thank you for contacting the Elections Division of the Office of the Texas Secretary of State.

Any person who believes that a criminal violation of the Code has occurred may file [a complaint](#). In order to initiate the complaint process, a written and signed complaint must be filed with the Secretary of State. The complaint must allege the violation with particularity, identify the person(s) or entity responsible for the alleged violation, and contain a reference to the section of the Code alleged to have been criminally violated, if known.

Pursuant to Section 31.006 of the Texas Election Code, the Office of the Secretary of State has the ability to refer elections complaints to the Office of the Attorney General. If, after receiving a complaint alleging criminal conduct in connection with an election, the Secretary of State determines that there is reasonable cause to suspect that the alleged criminal conduct occurred, the Secretary of State shall promptly refer the complaint to the Attorney General. The Secretary of State shall deliver to the Attorney General all pertinent documents in the Secretary of State's possession.

Again, thank you for contacting our office. If you have any additional questions or if we can be of further assistance, please contact our office at 1.800.252.8683 or email us at Elections@sos.texas.gov.

Elections Division Staff
Office of the Texas Secretary of State
1019 Brazos Street | Rudder Building, 2nd Floor | Austin, Texas 78701
1.800.252.VOTE (8683)

elections@sos.texas.gov | www.sos.state.tx.us

or Voter Related Information, please visit:



The information contained in this email is intended to provide advice and assistance in election matters per §31.004 of the Texas Election Code. It is not intended to serve as a legal opinion for any matter. Please review the law yourself, and consult with an attorney when your legal rights are involved.

From: [REDACTED] >
Sent: Saturday, February 20, 2021 10:57 AM
To: SAO Intake <saointake@sao.texas.gov>
Subject: Tarrant County election fraud

Have you seen this?

This is unprecedented election fraud that to me was obviously planned.

<https://www.independentsentinel.com/election-oddities-in-tarrant-county-turning-blue-are-mind-blowing/>

Please advise.

Linda Armijo

Duncanville

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From: Elections Internet
Sent: Tuesday, November 17, 2020 3:41 PM
To: [REDACTED]
Cc: 'HIGarcia@tarrantcounty.com'
Subject: FW: Voter Fraud
Attachments: Voter Fraud.pdf; Lori Perry.pdf

Thank you for contacting the Elections Division of the Office of the Texas Secretary of State.

Attached is a response to your complaint that was submitted to our office regarding your concerns about being a victim of voter fraud.

Again, thank you for contacting our office. If you have any additional questions or if we can be of further assistance, please contact our office at 1.800.252.8386 or email us at Elections@sos.texas.gov.

Elections Division

Office of the Secretary of State
800-252-VOTE(8683)

www.sos.state.tx.us/elections/index.shtml

For Voter Related Information, please visit:



The information contained in this email is intended to provide advice and assistance in election matters per §31.004 of the Texas Election Code. It is not intended to serve as legal advice for any matter. Please review the law yourself, and consult with an attorney when your legal rights are involved.

From: Lori Perry <[REDACTED]>
Sent: Monday, October 26, 2020 12:50 PM
To: Elections Internet <Elections@sos.texas.gov>
Subject: Voter Fraud

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Dear Election Board,

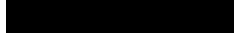
I am a victim of voter fraud. When I went to the polls on Saturday, October 24, I was told that I had already voted and "here's another one". My right to vote has been robbed by the corruption of how this election is being handled with mail in ballots. Someone stole my identity and voted in my name. Attached is the complaint forms that I have filled out and signed detailing this terrible injustice.

Please investigate!

Best regards,

Lori Perry

Executive Assistant to Cash Nickerson, Chairman & CEO


[\(214\) 647-9665](tel:(214)647-9665)



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The State of Texas



Elections Division
P. O. Box 12060
Austin, Texas 78711-2060
www.sos.state.tx.us

Phone: 512-463-5650
Fax: 512-475-2811
Dial 7-1-1 For Relay Services
(800) 252-VOTE (8683)

Ruth R. Hughs
Secretary of State

November 17, 2020

Via electronic mail: [REDACTED]

Dear Mr. Perry,

This letter is in response to the complaint you submitted to our office regarding your voting experience in Tarrant County on October 24, 2020. Our understanding is that you are registered to vote in Tarrant County. However, when you presented to vote in person, you were informed that someone had already voted under your name. As such, you cast a provisional ballot.

As an example, provisional voting is designed to allow a voter whose name does not appear on the list of registered voters due to an administrative error to vote. There are other circumstances under the Election Code which would allow a voter to cast a provisional ballot. The voter-marked provisional ballots are kept separate from the regular ballots, and the voter's records will be reviewed by the provisional voting ballot board (the early voting ballot board), to determine if the ballot is to be counted or rejected.

The Office of the Texas Secretary of State does not have any authority to investigate allegations of criminal conduct. However, if our office receives a complaint that provides reasonable cause to suspect that alleged criminal conduct occurred in connection to an election, our office is required to refer the complaint to the Texas Attorney General for investigation. Tex. Elec. Code § 31.006 (2015).

Our office has reviewed your concerns. However, our office is not referring this matter to the Texas Attorney General for investigation at this time because additional information is needed. Please note that our office is forwarding a copy of your complaint, along with our response, to the Tarrant County Elections Administrator, Heider Garcia, so that he may review this matter further and advise our office as to his findings.

In the interim if you have any further questions, please do not hesitate to contact the Elections Division toll-free at 1-800-252-VOTE (8683).

Sincerely,

A blue ink signature of Keith Ingram, written in a cursive style, enclosed in a rectangular box.

Keith Ingram
Director of Elections

Page 2

KI: HM

CC: Heider Garcia
Tarrant County Elections Administrator
2700 Premier Street
Fort Worth, TX 76111

ELECTION COMPLAINT TO THE TEXAS SECRETARY OF STATE

Docket Number

**OFFICE USE
ONLY**Date Hand-delivered or Date Postmarked
/ /

Please read the Important Information at the end of this document. The Secretary of State has no authority to order a new election, change an election result, or conduct a criminal investigation. A complaint filed with this form will not alter the results of an election.

This complaint form **MUST BE SIGNED** before it is submitted to the Secretary of State; therefore, you must print it out and sign it before mailing or faxing a copy or emailing a scanned, signed copy.

I. IDENTITY OF COMPLAINANT

1 COMPLAINANT NAME	MS / MRS / MR	FIRST	LORI	MI	Beimel
	NICKNAME	LAST	Perry	SUFFIX	
2 COMPLAINANT PHYSICAL ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY	STATE	ZIP CODE
	1900 Yucca Trail		Hurst	TX	76054
(Full home or business address, including street, city, state, and zip code)					
3 COMPLAINANT MAILING ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY	STATE	ZIP CODE
☒ (check if same as above)					
(Full home or business address, including street, city, state, and zip code)					
4 COMPLAINANT TELEPHONE NUMBER	AREA CODE	PHONE NUMBER	EXT	5 COMPLAINANT E-MAIL ADDRESS	
	817	691 5792			

II. IDENTITY OF RESPONDENT

PERSON OR ENTITY COMMITTING ALLEGED VIOLATION(S)

6 RESPONDENT NAME	MS / MRS / MR	FIRST		MI	
	NICKNAME	LAST	Unknown - Someone used my voting information	SUFFIX	
7 RESPONDENT POSITION OR TITLE					
8 RESPONDENT PHYSICAL ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY	STATE	ZIP CODE
(Full home or business address, including street, city, state, and zip code)					
9 RESPONDENT MAILING ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY	STATE	ZIP CODE
☐ (check if same as above)					
(Full home or business address, including street, city, state, and zip code)					
10 RESPONDENT TELEPHONE NUMBER	AREA CODE	PHONE NUMBER	EXT	11 RESPONDENT E-MAIL ADDRESS (IF KNOWN)	

GO TO PAGE 2

NOTICE: THIS COMPLAINT IS PUBLIC RECORD ONCE REVIEW IS COMPLETED BY THE SECRETARY OF STATE AND/OR ATTORNEY GENERAL.

TX-SQS-21-1682-E-000113

Revised 2/28/2014

AMERICAN
OVERSIGHT

III. NATURE OF ALLEGED VIOLATION

Page 2

If you believe that a criminal violation of the Code has occurred, please state the specific acts committed by the person or entity named in this complaint, along with a reference to the section of the Code alleged to have been violated, if known. If you need more space, please attach a separate sheet.

I, Lori Beimel Perry, went to vote on Saturday, October 24, 2020, at approximately 7:15 AM. When I checked in by giving my drivers license and voter's registration card, they looked me up in the system and then told me that I had already voted. She said - "Here's another one." I then had to sit with the polling manager while she called the election office to find out what to do. I had to fill out a green envelope and place my ballot in the envelope. She then gave me a ballot and told me to bring it back to her after I voted. I did so and she then placed my ballot in a large canvas bag with hundreds of other green envelopes to be taken to the election office. And gave me the attached notice which says my vote may or may not count.

(next page)

ATTACH ADDITIONAL PAGES AS NEEDED

IV. STATEMENT OF FACTS

Page 3

State the facts constituting the alleged violation(s), including the dates on which or the period of time in which the alleged violation(s) occurred. Identify allegations of fact not personally known to the complainant, but alleged on information and belief. Please use simple, concise, and direct statements.

ELECTION IN WHICH VIOLATION(S) OCCURRED

NAME OF ELECTION Presidential DATE OF ELECTION 11/3/2020
MM/DD/YYYY

COUNTY OR POLITICAL SUBDIVISION TARRANT PRECINCT 3196

I am a victim of voter fraud.
my right to vote has been
violated by corruption.
This has to stop! ~~I have seen~~
please investigate to have a
FAIR Election.

ATTACH ADDITIONAL PAGES AS NEEDED

AMERICAN
OVERSIGHT

NOTICE: THIS COMPLAINT IS PUBLIC RECORD ONCE REVIEW IS COMPLETED BY THE SECRETARY OF STATE AND/OR ATTORNEY GENERAL.

TX-SOS-21-1682-E-000115

Revised 2/28/2014

V. LISTING OF DOCUMENTS AND OTHER MATERIALS

Page 4

List all documents and other materials filed with this complaint. Additionally, list all other documents and other materials that are relevant to this complaint and that are within your knowledge, including their location, if known.

- ① Notice of Provisional Voter
- ② Voter Registration CARD

ATTACH ADDITIONAL PAGES AS NEEDED

VI. SIGNED STATEMENT**Page 5**

I, Lori B. Perry, the undersigned,
PRINTED NAME OF COMPLAINANT
under penalty of perjury do swear or affirm that the information contained in this
complaint is true and correct to the best of my knowledge.

I have read and understand the accompanying instructions, and I am aware that
completion of this form cannot and will not alter the outcome of the election.

Lori B. Perry
SIGNATURE OF COMPLAINANT

**NOTICE: THIS COMPLAINT IS NOT CONFIDENTIAL; ONCE REVIEWED BY
THE SECRETARY OF STATE, IT WILL BE TREATED AS A PUBLIC RECORD.**

REMINDER: YOU MUST SIGN THIS FORM PRIOR TO SUBMITTING**IF MAILING, PLEASE SEND TO:**

Texas Secretary of State
Elections Division
c/o Legal Dept.
P.O. Box 12060
Austin, TX 78711

IF FAXING, PLEASE SEND TO:

512.475.2811

IF EMAILING, PLEASE SEND TO:

elections@sos.texas.gov

Voter Registrar (817) 831-VOTE (8683)
2700 Premier Street
Fort Worth, TX 76111
www.tarrantcounty.com/elections

Secretary of State's Office
Elections Division
1-800-252-VOTE (8683)
www.sos.state.tx.us

RETURN SERVICE REQUESTED

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PERMIT NO. 1139



Scan or visit our website to find your
polling place. Escanee o visite, nuestra página
web para encontrar su casilla electoral.
Duyệt (quét) hoặc truy cập trang web của chúng
tôi để tìm địa điểm bỏ phiếu của bạn.

N10522849



VOTER REGISTRATION CERTIFICATE (Certificado de Registro Electoral) Giấy Chứng Nhận Ghi Danh Của Cử Trú			
TARRANT COUNTY (Condado de Tarrant) Quận Tarrant			
VOID	ID Exempt (Exento de ID) Mẫu Xác Nhận	Gender (Sexo) Giới Tính	Valid from (Valido desde) Hiệu lực từ
1043921078		F	01/01/2020
Year of Birth - (Año de Nacimiento) Năm Sinh	Precinct Number (Número de Precinto) Phân Khu Số	thru (hasta) đến hết	
1954	3196	12/31/2021	
Name and Permanent Residence Address (Nombre y dirección residencial permanente) Tên Họ và Địa Chỉ Cư Trú			
PERRY, LORI BEIMEL 1900 YUCCA TRL HURST TX 76054			
X			
VOTER MUST PERSONALLY SIGN HIS/HER NAME IMMEDIATELY UPON RECEIPT, IF ABLE. (El votante debe firmar esta tarjeta personalmente al recibirla, si puede.) Cử tri phải đích thân ký tên của mình ngay sau khi nhận được, nếu có thể.			

U.S. REP. (Rep. de los E. U.) Dân Biểu Hoa Kỳ	STATE SEN. (Sen. Estatal) Thượng Nghị Sĩ Tiểu Bang	STATE REP. (Rep. Estatal) Dân Biểu Tiểu Bang	COMM. PCT. (Com. Pcto.) Ủy Viên Quận Phần Khu	J.P. PCT. (J.P. Pcto.) Chánh Án Hòa Giải Phần Khu	TCC
24	09	92	03	03	TC2
CITY (Ciudad) Thành Phố	CITY COUNCIL (Concejo Municipal) Hội Đồng Thành Phố	ISD	ISD SEAT (Asiento) Khu Học Chánh Độc Lập Ghế Số	SBOE	WATER (Agua) Thủy Cục
HUR		HEB		11	
Cert. No. (Num. de Cert.) Số Chứng Nhận					
17106					
Name and Mailing Address (Nombre y Dirección de Correo) Tên Họ và Địa Chỉ Thư Tin					
LORI BEIMEL PERRY 1900 YUCCA TRL HURST TX 76054-3146					

Party Affiliation
(Afiliación del Partido) Đảng Phái

338245



LORI PERRY
2020-10-24 07:49

AW7-15a, 9/09
Prescribed by Secretary of State
Section 65.059, Texas Election Code

Notice to Provisional Voter

A determination whether your ballot will be counted will be made by the early voting ballot board after the election. A notice will be mailed to you within 30 days of the election at the address you provided on your affidavit to vote a provisional ballot indicating either (1) that your ballot was counted or (2) if it was not counted, the reason your ballot was not counted.

Your affidavit will be retained by the voter registrar who will use the information on the affidavit to update your voter registration information or if you are not a registered voter, the affidavit will be submitted to the voter registrar as a new voter registration application. If you have any questions, call the Secretary of State's Office toll free 1-800-252-VOTE(8683).

From: John Davies [REDACTED] >
Sent: Wednesday, November 25, 2020 3:59 PM
To: Elections Internet
Subject: Fwd: Tarrant County Election Complaint
Attachments: 20201125-155235.pdf

CAUTION: This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to Informationsecurity@sos.texas.gov.

CAUTION: This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to Informationsecurity@sos.texas.gov.

Form attached for non verification of voter ID in Fort Worth.

ELECTION COMPLAINT TO THE TEXAS SECRETARY OF STATE

Docket Number

**OFFICE USE
ONLY**Date Hand-delivered or Date Postmarked
/ /

Please read the Important Information at the end of this document. The Secretary of State has no authority to order a new election, change an election result, or conduct a criminal investigation. A complaint filed with this form will not alter the results of an election.

This complaint form **MUST BE SIGNED** before it is submitted to the Secretary of State; therefore, you must print it out and sign it before mailing or faxing a copy or emailing a scanned, signed copy.

I. IDENTITY OF COMPLAINANT

1 COMPLAINANT NAME	MS / MRS / MR	FIRST	MI
	Mr John		F
	NICKNAME	LAST	SUFFIX
		Davies	Jr.
2 COMPLAINANT PHYSICAL ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY STATE ZIP CODE
	105 Linden Ln Fort Worth TX 76107		
(Full home or business address, including street, city, state, and zip code)			
3 COMPLAINANT MAILING ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY STATE ZIP CODE
(Full home or business address, including street, city, state, and zip code)			
4 COMPLAINANT TELEPHONE NUMBER	AREA CODE	PHONE NUMBER	EXT
	713	449-52	
5 COMPLAINANT E-MAIL ADDRESS			

II. IDENTITY OF RESPONDENT

PERSON OR ENTITY COMMITTING ALLEGED VIOLATION(S)

6 RESPONDENT NAME	MS / MRS / MR	FIRST	MI
	Unknown		
	NICKNAME	LAST	SUFFIX
7 RESPONDENT POSITION OR TITLE	Poll Worker		
8 RESPONDENT PHYSICAL ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY STATE ZIP CODE
(Full home or business address, including street, city, state, and zip code)			
9 RESPONDENT MAILING ADDRESS	ADDRESS (TO INCLUDE APT / SUITE # IF APPLICABLE)		CITY STATE ZIP CODE
(Full home or business address, including street, city, state, and zip code)			
10 RESPONDENT TELEPHONE NUMBER	AREA CODE	PHONE NUMBER	EXT
11 RESPONDENT E-MAIL ADDRESS (IF KNOWN)			

GO TO PAGE 2

III. NATURE OF ALLEGED VIOLATION**Page2**

If you believe that a criminal violation of the Code has occurred, please state the specific acts committed by the person or entity named in this complaint, along with a reference to the section of the Code alleged to have been violated, if known. If you need more space, please attach a separate sheet.

Non verification of ID.

ATTACH ADDITIONAL PAGES AS NEEDED

IV. STATEMENT OF FACTS**Page 3**

State the facts constituting the alleged violation(s), including the dates on which or the period of time in which the alleged violation(s) occurred. Identify allegations of fact not personally known to the complainant, but alleged on information and belief. Please use simple, concise, and direct statements.

ELECTION IN WHICH VIOLATION(S) OCCURRED

NAME OF ELECTION 2020 Election DATE OF ELECTION 11 / 3 / 202
MM/DD/YYYY

COUNTY OR POLITICAL SUBDIVISION Tarrant County PRECINCT 4137

I early voted on 10/15 at Precinct 4137 at Tarrant County location 33, UNT - Health Science Center; Carl E. Everett Education and Administration building lower level Atrium. Address: 3500 Camp Bowie Boulevard, Fort Worth, Texas 76107.

When voting I gave my name and date of birth to the poll worker and identification was not verified by picture ID before given my ballot. When asking the poll worker if they needed ID she said no.

ATTACH ADDITIONAL PAGES AS NEEDED

V. LISTING OF DOCUMENTS AND OTHER MATERIALS**Page 4**

List all documents and other materials filed with this complaint. Additionally, list all other documents and other materials that are relevant to this complaint and that are within your knowledge, including their location, if known.

ATTACH ADDITIONAL PAGES AS NEEDED

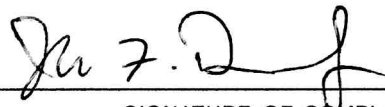
VI. SIGNED STATEMENT**Page 5**

I, John F. Davies Jr., the undersigned,

PRINTED NAME OF COMPLAINANT

under penalty of perjury do swear or affirm that the information contained in this complaint is true and correct to the best of my knowledge.

I have read and understand the accompanying instructions, and I am aware that completion of this form cannot and will not alter the outcome of the election.



SIGNATURE OF COMPLAINANT

**NOTICE: THIS COMPLAINT IS NOT CONFIDENTIAL; ONCE REVIEWED BY
THE SECRETARY OF STATE, IT WILL BE TREATED AS A PUBLIC RECORD.**

REMINDER: YOU MUST SIGN THIS FORM PRIOR TO SUBMITTING**IF MAILING, PLEASE SEND TO:**

Texas Secretary of State
Elections Division
c/o Legal Dept.
P.O. Box 12060
Austin, TX 78711

IF FAXING, PLEASE SEND TO:

512.475.2811

IF EMAILING, PLEASE SEND TO:

elections@sos.texas.gov

VII. IMPORTANT INFORMATION

Pursuant to Section 31.006 of the Texas Election Code (the "Code"), the Office of the Secretary of State (the "Secretary of State") has the ability to refer elections complaints to the Office of the Attorney General (the "Attorney General"). If, after receiving a complaint alleging criminal conduct in connection with an election, the Secretary of State determines that there is reasonable cause to suspect that the alleged criminal conduct occurred, the Secretary of State shall promptly refer the complaint to the Attorney General. The Secretary of State shall deliver to the Attorney General all pertinent documents in the Secretary of State's possession.

Any person who believes that a criminal violation of the Code has occurred may file a complaint. In order to initiate the complaint process, a written and signed complaint must be filed with the Secretary of State. The complaint must allege the violation with particularity, identify the person(s) or entity responsible for the alleged violation, and contain a reference to the section of the Code alleged to have been criminally violated, if known.

The Secretary of State has no authority to order a new election, change an election result, or conduct a criminal investigation. This form is to be used solely to document alleged election irregularities and submit allegations of criminal violations of the Code to be referred to the Attorney General. Often complaints will be Code violations that do not amount to criminal violations or acts. These violations are election irregularities which may form the basis of an election contest, but do not carry a criminal penalty. These election irregularities will not be referred to the Attorney General for possible criminal prosecution.

Challenging an election result can be done either through (1) a recount or (2) an election contest. If you are seeking to alter the outcome of the election, you will need to use one of these methods of challenging the results, described below. **A complaint filed with this form will not alter the results of an election.**

Legal Remedies That May Alter the Election Outcome

1. Recount

Recounts are used only to recount the votes in a particular race (office) or measure. A recount does not have the scope or authority of an election contest in court, i.e., the recount committee will not look at the manner in which voters were qualified to vote in person or by mail or whether voters were eligible to vote in the election. The governing body of an entity cannot conduct a recount on its own motion, e.g., at the canvass.

Please note that recount request deadlines occur soon after the canvass - a recount must be requested not later than two days following the canvass. More information on filing recounts (including form, deposit information, and who and how to file) is available on the Secretary of State's website.

2. Election Contest

If a candidate disputes the outcome of the election, regardless of whether or not a recount has been conducted, and has discovered irregularities, fraud, or mistakes in the conduct of the election that affected or could have affected the outcome, he/she can file an election contest to challenge the election results. The legal question raised by an election contest is whether the outcome of the contested election, as shown by the final canvass, is not (or cannot be conclusively determined to be) the true outcome because (1) illegal votes were counted, or because (2) an election officer or other official administering the election either (i) prevented eligible voters from voting, (ii) failed to count legal votes, (iii) engaged in fraud or illegal conduct, or (iv) erred in some material way.

Contests involving county elections are filed in the district court in the relevant county. In most circumstances, the filing deadline for an election contest is 30 days after the canvass, except in the case of a primary or an election where a runoff is necessary, in which case the deadline for filing is 10 days after the final canvass. If a recount is held and the votes are changed, the date of the canvass of the recount (i.e., final canvass) becomes the new date by which the contest deadline is calculated.

Any losing candidate may contest an election. In a contest of an officer election, the contestant files suit against the election's winner (or in the event that the election outcome is determined by majority vote rather than plurality vote, the person or persons entitled to a place on the runoff ballot). Voters at large within a political subdivision do not possess standing to intervene as parties to an election contest for public office.

In an election contest, the court has the authority to: (1) examine ballots and equipment; (2) compel voters to reveal how they voted; (3) declare an election void if illegal votes are greater than or equal to the number of votes necessary to change the outcome or cannot ascertain the true outcome of the election; (4) order a new election (or new runoff election), if unable to ascertain true outcome; (5) subtract illegal votes, if able to determine the side for which an illegal vote was cast; or (6) declare outcome of election, if able to ascertain true outcome.

If you think either a recount or an election contest is the proper procedure for the remedy you seek, you may wish to consult private legal counsel regarding your legal options. The Secretary of State staff can provide general guidance on these procedures as well.

From: Dakota Pekerti [REDACTED] >
Sent: Tuesday, July 7, 2020 8:59 PM
To: Elections Internet
Subject: Never received Texas Absentee Ballot Voter form

Follow Up Flag: Follow up
Flag Status: Completed

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To whom it may concern,

My name is Dakota Pekerti and I am a voter registered in Tarrant County who is currently working out of state. I have requested a mail in voter form application multiple times over the past two months but have yet to receive any such mail from the voting committee. I have no printer so there is no other way for me to send out my application. The tardiness of being able to send in my application has meant that I am no longer able to vote in the July 14th election according to the FAQ on your website. I would like to formally request a confirmation that the applications have been sent to my address and if not to file a complaint.

Thank you,
Dakota Pekerti

From: Elections Internet
Sent: Thursday, October 29, 2020 2:44 PM
To: 'Mike Diersen'; Elections Internet
Subject: RE: Ballot complaint

Thank you for contacting the Elections Division of the Office of the Texas Secretary of State. **Please be advised the last day to order an absentee ballot for the November 3, 2020 Election was October 23, 2020.**

The Early Voting Clerk in your home Texas County is the one responsible for mailing all balloting materials to you and receiving them back from you. **Please check with your county Early Voting Clerk as to the status of your ballot by mail or to order one.**

Contact information for the Early Voting Clerk in your Texas county is available here:
<https://www.sos.state.tx.us/elections/voter/county.shtml>

For additional information on voting in Texas, please see www.votetexas.gov.

Again, thank you for contacting our office. If you have any additional questions or if we can be of further assistance, please contact our office at 1.800.252.8683 or email us at Elections@sos.texas.gov.

Elections Division

Office of the Secretary of State
800-252-VOTE(8683)

www.sos.state.tx.us/elections/index.shtml

For Voter Related Information, please visit:



The information contained in this email is intended to provide advice and assistance in election matters per §31.004 of the Texas Election Code. It is not intended to serve as legal advice for any matter. Please review the law yourself, and consult with an attorney when your legal rights are involved.

From: Mike Diersen [REDACTED]
Sent: Thursday, October 29, 2020 2:41 PM
To: Elections Internet <Elections@sos.texas.gov>
Subject: Ballot complaint

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Approximately 5 weeks ago I mailed the Texas Elections Office in Austin the required form needed to request a ballot for the upcoming election.

I asked for a ballot to be mailed to me in Illinois because I am temporarily away from my home of Tarrant county and unable to be in Texas to vote in the General Election from here.

To date, I still have not received my ballot and I'm not happy.

I have been in touch with the Attorney General's Office regarding this and they gave me your e-mail address.

I'm angry that your office has failed to do it's civic duty and provide me with a ballot.

--

Michael Diersen
(817) 584-4244

From: Elections Internet
Sent: Thursday, July 30, 2020 3:04 PM
To: [REDACTED]
Subject: RE: Complaint from Cassandra Roberson
Attachments: Cassandra Roberson.pdf

Thank you for contacting the Elections Division of the Office of the Texas Secretary of State.

Attached is a response to your complaint that was submitted to our office regarding your concerns against Precinct 2644 in Tarrant County.

Again, thank you for contacting our office. If you have any additional questions or if we can be of further assistance, please contact our office at 1.800.252.8386 or email us at Elections@sos.texas.gov.

Elections Division
Office of the Secretary of State
800-252-VOTE(8683)
www.sos.state.tx.us/elections/index.shtml
For Voter Related Information, please visit:



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The State of Texas



Elections Division
P.O. Box 12060
Austin, Texas 78711-2060
www.sos.state.tx.us

Phone: 512-463-5650
Fax: 512-475-2811
Dial 7-1-1 For Relay Services
(800) 252-VOTE (8683)

Ruth R. Hughs
Secretary of State

July 30, 2020

Via electronic mail: [REDACTED]

Dear Ms. Roberson,

This letter is in response to the complaint you submitted to our office regarding your complaint against Precinct 2644. For a general or special election in which the use of county election precincts is required, the County Clerk shall recommend the location of the polling place for each county election precinct. The Commissioner's Court shall designate the recommended location as the polling place unless the Court finds good cause to reject the recommendation. In that case, the Commissioner's Court shall designate another place. Sec.43.002(a). If county election precincts are consolidated, the Commissioner's Court shall designate the location of the polling place for the consolidated precinct. Sec. 42.002(b).

The Office of the Texas Secretary of State does not have any authority to investigate allegations of criminal conduct. However, if our office receives a complaint that provides reasonable cause to suspect that alleged criminal conduct occurred in connection to an election, our office is required to refer the complaint to the Texas Attorney General for investigation. Tex. Elec. Code § 31.006 (2015).

Our office has reviewed each of your concerns, but none of the facts that you have presented to us in your complaint appear to involve criminal matters under the election code. Therefore, our office is not referring this matter to the Texas Attorney General for investigation. If you have additional information that was not included in your complaint that demonstrates that criminal conduct may have occurred, please send it to us for further review.

If you have any further questions, please do not hesitate to contact the Elections Division toll-free at 1-800-252-(VOTE) 8683.

Sincerely,

A handwritten signature in blue ink, appearing to read "Keith Ingram".

Keith Ingram
Director of Elections

From: Elections Internet
Sent: Wednesday, July 15, 2020 10:25 AM
To: [REDACTED]
Subject: RE: Complaint
Attachments: Candace Miller.pdf

Thank you for contacting the Elections Division of the Office of the Texas Secretary of State.

Attached is a response to your complaint that was submitted to our office regarding your concerns about not being allowed to vote fairly or completely.

Again, thank you for contacting our office. If you have any additional questions or if we can be of further assistance, please contact our office at 1.800.252.8386 or email us at Elections@sos.texas.gov.

Elections Division

Office of the Secretary of State
800-252-VOTE(8683)

www.sos.state.tx.us/elections/index.shtml

For Voter Related Information, please visit:



The information contained in this email is intended to provide advice and assistance in election matters per §31.004 of the Texas Election Code. It is not intended to serve as legal advice for any matter. Please review the law yourself, and consult with an attorney when your legal rights are involved.

From: Miller, Candace [Business] <[REDACTED]>
Sent: Wednesday, July 15, 2020 7:52 AM
To: Elections Internet <Elections@sos.texas.gov>
Subject: Complaint

CAUTION: This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to informationsecurity@sos.texas.gov.

I look forward to your response on this Complaint.

Thanks,

Candace Miller
Texas registered voter

The State of Texas



Elections Division
P. O. Box 12060
Austin, Texas 78711-2060
www.sos.state.tx.us

Phone: 512-463-5650
Fax: 512-475-2811
Dial 7-1-1 For Relay Services
(800) 252-VOTE (8683)

Ruth R. Hughs
Secretary of State

July 15, 2020

Via electronic mail: [REDACTED]

Dear M. Miller,

This letter is in response to the complaint you submitted to our office in regards to not being able to vote fairly and completely. (Tarrant County)

The Office of the Texas Secretary of State does not have any authority to investigate allegations of criminal conduct. However, if our office receives a complaint that provides reasonable cause to suspect that alleged criminal conduct occurred in connection to an election, our office is required to refer the complaint to the Texas Attorney General for investigation. Tex. Elec. Code § 31.006 (2015).

Our office has reviewed each of your concerns, but none of the facts that you have presented to us in your complaint appear to involve criminal matters under the election code. Therefore, our office is not referring this matter to the Texas Attorney General for investigation. If you have additional information that was not included in your complaint that demonstrates that criminal conduct may have occurred, please send it to us for further review.

If you have any further questions, please do not hesitate to contact the Elections Division toll-free at 1-800-252-(VOTE) 8683.

Sincerely,

A handwritten signature in blue ink, appearing to read "Keith Ingram".

Keith Ingram
Director of Elections

KI: TS

From: Heider I. Garcia <HIGarcia@tarrantcounty.com>
Sent: Friday, October 16, 2020 7:04 PM
To: Heidi Martinez; [REDACTED]
Cc: Elections Internet
Subject: RE: Recent voting in Tarrant County (EI Response)

Sensitivity: Personal

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Good evening,

The screen that appears when a voter starts their session (before the presidential race) is the list of abbreviations of the political parties. There is no question on that screen, the only action the voter can take is to press next. This is a requirement of the Texas Elections Code.

Regards,

Heider Garcia
Tarrant County Elections Administrator
2700 Premier Street
Fort Worth, Texas 76111
(817) 831-8683



From: Heidi Martinez <HMartinez@sos.texas.gov>
Sent: Friday, October 16, 2020 5:43 PM
To: [REDACTED]
Cc: Elections Internet <Elections@sos.texas.gov>
Subject: Recent voting in Tarrant County (EI Response)
Sensitivity: Personal

EXTERNAL EMAIL ALERT! Think Before You Click!

As an initial matter, thank you for your concern for the integrity of Texas elections and for taking the time to send in the inquiry.

We are forwarding a copy of your email to the early voting clerk in Tarrant County to make him aware of your complaint and to address same.

Heidi Martinez
Staff Attorney – Elections Division
Office of the Texas Secretary of State
1019 Brazos Street | Rudder Building, 2nd Floor | Austin, Texas 78701
1.800.252.VOTE (8683)
elections@sos.texas.gov | www.sos.state.tx.us/elections

For Voter Related Information, please visit:



The information contained in this email is intended to provide advice and assistance in election matters per §31.004 of the Texas Election Code. It is not intended to serve as a legal opinion for any matter. Please review the law yourself, and consult with an attorney when your legal rights are involved.

From: Frederick Miller [REDACTED]
Sent: Thursday, October 15, 2020 1:25 PM
To: Elections Internet <Elections@sos.texas.gov>
Subject: Recent voting in Tarrant County

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To Whom it May Concern:

My family, and I, just voted early for the 2020 Presidential Election. I voted on the 13th and my parents voted today, the 15th, and we all voted at the same location. When my parents inserted their ballots into the machine – the first question they both received was about their political affiliation – whether they were Democrats, Republicans, Independents, etc. I was NOT asked this on the 13th. Is this a random question – or is something strange going on? I'm starting to question the validity of my ballot/vote. Any information regarding this will be greatly appreciated.

Frederick J. Miller

Sent from [Mail](#) for Windows 10

From: Krystine Ramon
Sent: Monday, July 20, 2020 3:34 PM
To: bonita.howard@hud.gov
Subject: RE: SAO Hotline 20-3024 (EI Response)

Hello Ms. Howard,

My name is Krystine Ramon. I am one of the staff attorney's with the Texas Secretary of State's Office. I received your complaint. I am very sorry to hear about this. I tried calling the number 409-788-1011 listed below but was unable to leave a voicemail. I would like to speak further with you in regards to this situation so that I can try to find out what happened. Please let me know a good phone number to call you.

Krystine N. Ramon
Staff Attorney – Elections Division
Office of the Texas Secretary of State
1019 Brazos Street | Rudder Building, 2nd Floor | Austin, Texas 78701
1.800.252.VOTE (8683)
elections@sos.texas.gov |
<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.sos.texas.gov%2F&data=02%7C01%7CCAdkins%40sos.texas.gov%7Cd3b86bb60cce45b700d208d82cec43b7%7C760188c0f63443a096dfec1b8eca6719%7C0%7C0%7C637308740555420260&msdata=58ruaE75KqnZQsLAF%2F8%2FxFuG6yNqP%2B2TvZgjCZGJEHbY%3D&reserved=0>
For Voter Related Information, please visit:

The information contained in this email is intended to provide advice and assistance in election matters per §31.004 of the Texas Election Code. It is not intended to serve as a legal opinion for any matter. Please review the law yourself, and consult with an attorney when your legal rights are involved.

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

From: System-Generated Email <webmaster@sao.texas.gov>
Sent: Friday, July 17, 2020 8:36 PM
To: Hotline Intake <HotlineIntake@sao.texas.gov>
Subject: Fraud, Waste and/or Abuse Hotline

The following fraud, waste, or abuse report was received

Control Number: 203024

Name: Bonita Howard

Phone: 4047881011

Email: bonita.howard@hud.gov

Agency/University: 307 - Secretary of State

Organization/Company/Individual: Tarrant County Voting Office

Tarrant County Voting Office fraudulently changed my voting address. My voter's registration indicates an address for which I do not reside. Additionally, I did not make this change. I believe Lorraine Chambers or an affiliate used the voting registration system to change my address and not me. Further, I live in a totally different county and have voted in this county. My records did not reflect the address that is currently shown in your files.

This message contains information which may be an audit working paper and/or may be confidential, privileged, or otherwise exempt from open records. Unless you are the addressee (or authorized to receive for the addressee), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by reply e-mail and delete the message. Please contact the State Auditor's Office at publicinformation@sao.texas.gov before releasing this document in response to an open records request.

From: Heidi Martinez
Sent: Friday, October 16, 2020 5:43 PM
To: [REDACTED]
Cc: Elections Internet
Subject: Recent voting in Tarrant County (EI Response)

Sensitivity: Personal

As an initial matter, thank you for your concern for the integrity of Texas elections and for taking the time to send in the inquiry.

We are forwarding a copy of your email to the early voting clerk in Tarrant County to make him aware of your complaint and to address same.

Heidi Martinez
Staff Attorney – Elections Division
Office of the Texas Secretary of State
1019 Brazos Street | Rudder Building, 2nd Floor | Austin, Texas 78701
1.800.252.VOTE (8683)
elections@sos.texas.gov | www.sos.state.tx.us/elections

For Voter Related Information, please visit:



The information contained in this email is intended to provide advice and assistance in election matters per §31.004 of the Texas Election Code. It is not intended to serve as a legal opinion for any matter. Please review the law yourself, and consult with an attorney when your legal rights are involved.

From: Frederick Miller [REDACTED] >
Sent: Thursday, October 15, 2020 1:25 PM
To: Elections Internet <Elections@sos.texas.gov>
Subject: Recent voting in Tarrant County

CAUTION: This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please send this email as an attachment to Informationsecurity@sos.texas.gov.

To Whom it May Concern:

My family, and I, just voted early for the 2020 Presidential Election. I voted on the 13th and my parents voted today, the 15th, and we all voted at the same location. When my parents inserted their ballots into the machine – the first question they both received was about their political affiliation – whether they were Democrats, Republicans, Independents, etc. I was NOT asked this on the 13th. Is this a random question – or is something strange going on? I'm starting to question the validity of my ballot/vote. Any information regarding this will be greatly appreciated.

Frederick J. Miller

Sent from [Mail](#) for Windows 10

From: Elections Internet
Sent: Thursday, May 13, 2021 2:56 PM
To: [REDACTED]
Subject: Tarrant County Complaint
Attachments: Denise Linn.pdf

Thank you for contacting the Elections Division of the Office of the Texas Secretary of State.

Attached is a response to your complaint that was submitted to our office regarding your concerns regarding Tarrant County Elections.

Again, thank you for contacting our office. If you have any additional questions or if we can be of further assistance, please contact our office at 1.800.252.8386 or email us at Elections@sos.texas.gov.

Elections Division

Office of the Secretary of State
800-252-VOTE(8683)

www.sos.state.tx.us/elections/index.shtml

For Voter Related Information, please visit:



The information contained in this email is intended to provide advice and assistance in election matters per §31.004 of the Texas Election Code. It is not intended to serve as legal advice for any matter. Please review the law yourself, and consult with an attorney when your legal rights are involved.

The State of Texas



Elections Division
P.O. Box 12060
Austin, Texas 78711-2060
www.sos.state.tx.us

Phone: 512-463-5650
Fax: 512-475-2811
Dial 7-1-1 For Relay Services
(800) 252-VOTE (8683)

Ruth R. Hughs
Secretary of State

May 13, 2021

Via electronic mail: [REDACTED]

Dear Mrs. Linn,

This letter is in response to the complaint you submitted to our office regarding the Tarrant County Election.

The Office of the Texas Secretary of State does not have any authority to investigate allegations of criminal conduct. However, if our office receives a complaint that provides reasonable cause to suspect that alleged criminal conduct occurred in connection to an election, our office is required to refer the complaint to the Texas Attorney General for investigation. Tex. Elec. Code § 31.006 (2015).

Our office has reviewed each of your concerns, but none of the facts that you have presented to us in your complaint appear to involve criminal matters under the election code. Therefore, our office is not referring this matter to the Texas Attorney General for investigation. If you have additional information that was not included in your complaint that demonstrates that criminal conduct may have occurred, please send it to us for further review.

If you have any further questions, please do not hesitate to contact the Elections Division toll-free at 1-800-252-(VOTE) 8683.

Sincerely,

A handwritten signature in blue ink, appearing to read "Keith Ingram".

Keith Ingram
Director of Elections

KI:TS