

# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## JOHN POULOS, CEO OF DOMINION VOTING SYSTEMS PROVIDED FALSE TESTIMONY THAT MAY QUALIFY AS PERJURY ON DECEMBER 15, 2020

This document provides information in support of the criminal complaint that John Poulos, CEO of Dominion Voting Systems, committed fifteen counts of perjury during his December 15, 2020 testimony (<https://www.youtube.com/watch?v=s7scSfpwnqw>) before the Michigan Senate under oath.<sup>1</sup>

### 1 Applicable Statutes

The principal statute violated during the testimony under oath by Dominion CEO John Poulos was MCL 750.423. Michigan law is not limited, however, to the explicit statements of common law obstruction of justice or the statute of obstruction of justice. In *People v. Jenkins*, 624 N.W.2d 457, 244 Mich. App. 1 (2001), "Following a jury trial, defendant was convicted of common-law obstruction of justice for the fabricating of false, inaccurate, or misleading evidence that was material to a grand jury investigation, M.C.L. § 750.505; MSA 28.773, conspiracy to obstruct justice, M.C.L. § 750.157a; MSA 28.354(1), and two Election Law violations by appointing as an assistant to accept delivery of absentee voter ballots..." The appeals court found that obstruction of justice under the common law is not limited to the precise categories recognized such as MCL 750.423. *People v. Jenkins* held that circumstances similar to the common law are also covered. Therefore, by that reasoning, the Senate committee seeking to determine if there was wrong-doing played the same role as a grand jury. *People v. Jenkins* rejected formal technicalities or form over substance. The substance of false or misleading statements to a fact-finding body constitutes obstruction of justice. In this light, we contend that multiple statutes were violated as a result of the testimony of John Poulos under oath before the Michigan Senate.

#### 1.1 MCL 750.423 Perjury; penalty; "record" and "signed" defined.

Any person authorized by a statute of this state to take an oath, or any person of whom an oath is required by law, who willfully swears falsely in regard to any matter or thing respecting which the oath is authorized or required is guilty of perjury, a felony punishable by imprisonment for not more than 15 years.

Subsection (1) applies to a person who willfully makes a false declaration in a record that is signed by the person and given under penalty of perjury. As used in this subsection:

"Record" means information that is inscribed on a tangible medium or that is stored in an electronic or other medium and is retrievable in perceivable form.

"Signed" means the person did either of the following to authenticate or adopt the record:

Executed or adopted a tangible symbol.

Attached to or logically associated with the record an electronic symbol, sound, or process.

---

<sup>1</sup> John Poulos statements reflect wording provided in an automated transcript of video testimony. Video testimony can be viewed to determine accuracy of statements.

# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## 1.2 MCL 750.422 Perjury committed in courts.

Perjury committed in courts—Any person who, being lawfully required to depose the truth in any proceeding in a court of justice, shall commit perjury shall be guilty of a felony, punishable, if such perjury was committed on the trial of an indictment for a capital crime, by imprisonment in the state prison for life, or any term of years, and if committed in any other case, by imprisonment in the state prison for not more than 15 years.

## 1.3 MCL 750.426 Court reasonably believes perjury committed.

Proceeding when court reasonably believes perjury has been committed—Whenever it shall appear to any court of record that any witness or party who has been legally sworn and examined or has made an affidavit in any proceeding in a court of justice, has testified in such a manner as to induce a reasonable presumption that he has been guilty of perjury therein, the court may immediately commit such witness or party, by an order or process for that purpose, or may take a recognizance with sureties, for his appearing to answer to an indictment for perjury; and thereupon the witness to establish such perjury may, if present, be bound over to the proper court, and notice of the proceedings shall forthwith be given to the prosecuting attorney.

## 2 Counts

### 2.1 Ballots Aren't Sent Anywhere

#### 2.1.1 FALSE STATEMENT:

"let me be clear ballots aren't sent anywhere not overseas not over state lines and not even over county lines"<sup>2</sup>

#### 2.1.2 TRUTH:

Ballot images are treated as ballots in Dominion tabulation and adjudication systems. Dominion internal communications indicate that Serbian developers were able to run "end-to-end" tests on equipment featuring ballot scanning devices in Colorado from Serbia.<sup>3</sup> End-to-end testing most certainly involves ballot scanners. Ballot scanners indicate the existence of ballot images. Clearly, "overseas" developers had access to election equipment including ballot scanners in the United States. This "overseas" access applied not only to their test environments. It also applied to environments actively supporting elections in America. In support of the assertion, we know that 3 days before the November 3, 2020 election, Goran Obradovic, VP Engineering and GM Europe, and his team ("we") had remote access to the ballot scanners sufficient to modify the configuration settings of these scanners.<sup>4</sup> Access to ballot scanners means they have access to settings that impact ballot images. Access to settings that can alter ballot images means that they have the ability to change how those ballots are tabulated. Once again, they sought to change these settings less than 3 days before the general election. Mr. Obradovic appears to have been based in Toronto, Canada, but his

---

<sup>2</sup> December 15, 2020 testimony under oath by Dominion CEO John Poulos before the Michigan Senate Oversight Committee, Timestamp 15:09 (REF: <https://www.youtube.com/watch?v=s7scSfpwnqw>)

<sup>3</sup> April 22, 2020 10:10:54 email from Ranko Stamatovic to other Dominion employees (in Serbian), Subject: CO - testiranje (Exhibit A)

<sup>4</sup> 10/31/20 email from Goran Obradovic to Eric Coomer et al, "RE: Chicago EV tabluators" (Exhibit A)

## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

team was likely based in Serbia since his title refers to him as “GM Europe”. Either way, their communications demonstrate that ballot images could be altered “over state lines” or “county lines” or possibly even “overseas”. In further support of the assertion that foreign Dominion employees had remote access to election equipment processing ballot images, the Fulton County, PA v Dominion lawsuit featured evidence of remote access from a Canadian IP Address to ballot adjudication devices was provided.<sup>5</sup>

### 2.1.3 WHY FALSE STATEMENT IS MATERIAL FALSE STATEMENT

The false statement by Mr. Poulos attempts to paint a false picture that ballot access is confined to local jurisdictions. Once ballots have been digitized via Dominion systems, these ballots are available to remote actors across “county lines”, “state lines” and even “overseas”. The fact that Mr. Poulos issued this demonstrably false statement as part of his prepared remarks with legal counsel present demonstrates that his statement was pre-meditated and willful.

## 2.2 Internet Connections

### 2.2.1 FALSE STATEMENT:

“voting systems are by design meant to be used as closed systems that are not networked meaning that they are not connected to the internet”<sup>6</sup>

### 2.2.2 TRUTH:

Dominion Voting Systems are designed to be connected to the internet and are not closed systems.<sup>7</sup> The contract between the State of Michigan and Dominion Voting Systems clearly documents how the design of the voting systems used to conduct election in Michigan features the need for internet connections. For example, every single EMS configuration provided to the State of Michigan featured an internet connection to complete its election functions.<sup>8</sup> Moreover, Dominion internal communications indicate that Serbian developers were able to run “end-to-end” tests on equipment in Colorado from Serbia.<sup>9</sup> In Fulton County, PA v Dominion, evidence of remote access from a Canadian IP Address to ballot adjudication devices was provided.<sup>10</sup> None of this could have been accomplished without access to the internet.

### 2.2.3 WHY FALSE STATEMENT IS MATERIAL FALSE STATEMENT

The false statement by Mr. Poulos that his systems are designed to be closed systems is directly refuted by one of his own developers. His false statement that his systems are not designed to be networked or connected to the internet is refuted by the contents of his contract with the State of Michigan that features multiple reference to network connectivity and specifically internet connectivity. The fact that

---

<sup>5</sup> Fulton County, PA v Dominion Voting Systems, Civil Law Complaint, September 2022, p. 18-19 (Exhibit B)

<sup>6</sup> December 15, 2020 testimony under oath by Dominion CEO John Poulos before the Michigan Senate Oversight Committee, Timestamp 15:30 (REF: <https://www.youtube.com/watch?v=s7scSfpwnqw>)

<sup>7</sup> Internal Dominion Communications  
(See Exhibit C)

<sup>8</sup> Contract 071B7700117 between The State of Michigan and Dominion Voting Systems (See Exhibit D)

<sup>9</sup> April 22, 2020 10:10:54 email from Ranko Stamatovic to other Dominion employees (in Serbian), Subject: CO - testiranje (Exhibit A)

<sup>10</sup> Fulton County, PA v Dominion Voting Systems, Civil Law Complaint, September 2022, p. 18-19 (Exhibit B)

# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

Mr. Poulos issued this demonstrably false statement as part of his prepared remarks with legal counsel present demonstrates that his statement was pre-meditated and willful.

## 2.3 Impossible to Alter

### 2.3.1 FALSE STATEMENT:

“no dominion employee has given me any reason to suspect that they have or would do anything to try to alter an election outcome but what's even more important for you to know is that it would not be possible for them to do so”<sup>11</sup>

### 2.3.2 TRUTH:

Forensic analyses of Dominion EMS Server images in Antrim County, MI<sup>12</sup>, Maricopa County, AZ<sup>13</sup> and Mesa County, CO<sup>14</sup> indicate that it is indeed possible for anyone with access to the EMS Server including Dominion employees to alter an election outcome.

The installation of SQL Server Management Studio in each of these circumstances coupled with lax credential management practices enables anyone with access to the EMS server the ability to modify election results. That is, insiders or external intruders / hackers who should not have the server and data "rights" by their credentials to modify data are nevertheless able to infiltrate the stored data and make alterations. It is important to recognize that this can involve a complex interplay between the server capabilities and current settings, the installation details of the server, the software design and implementation, and human "user" practices that defeat the intended or hoped for security protections by undermining the intended security. User error is still error. Real-world practices that do not support the strengths of technical security features but expose vulnerabilities can be just as damaging as intentionally bad security. In real world operations, all functions and features must be working effectively and together to achieve the necessary security.

### 2.3.3 WHY FALSE STATEMENT IS MATERIAL FALSE STATEMENT

The false statement by Mr. Poulos that it would not be possible for a Dominion employee to alter an election outcome is refuted by multiple technical experts able to demonstrate how Dominion access credentials could be used to alter election outcomes. The fact that Mr. Poulos issued this demonstrably false statement as part of his prepared remarks with legal counsel present demonstrates that his statement was pre-meditated and willful.

---

<sup>11</sup> December 15, 2020 testimony under oath by Dominion CEO John Poulos before the Michigan Senate Oversight Committee, Timestamp 18:32 (REF: <https://www.youtube.com/watch?v=s7scSfpwnqw>)

<sup>12</sup> Bailey v Antrim County, Exhibit 9 Lenberg #2 (Exhibit E)

<sup>13</sup> Senate Hearing on the Election Audit in Maricopa County, AZ ([https://www.youtube.com/watch?v=PG\\_uvVthV68](https://www.youtube.com/watch?v=PG_uvVthV68)) (Exhibit F)

<sup>14</sup> Mesa County Report #2, <https://tinapeters.us/wp-content/uploads/2023/08/Mesa-county-forensic-report-no-2.pdf> (Exhibit G)

# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## 2.4 Certification

### 2.4.1 FALSE STATEMENT:

“our voting systems undergo an accreditation process run by the EAC the process involves compliance with all voluntary voter system guidelines including standards for secure software design such as software independence”<sup>15</sup>

### 2.4.2 TRUTH:

The above reference to EAC is a reference to the Federal Election Assistance Commission. Dominion has deployed software used for elections and the counting of ballots that has not been certified by the EAC.<sup>16</sup>

### 2.4.3 WHY FALSE STATEMENT IS MATERIAL FALSE STATEMENT

The false statement by Mr. Poulos that his voting systems have undergone EAC accreditation is refuted by evidence of the deployment of voting system configurations that have not been properly certified. The fact that Mr. Poulos issued this demonstrably false statement as part of his prepared remarks with legal counsel present demonstrates that his statement was pre-meditated and willful.

## 2.5 Logic and Accuracy

### 2.5.1 FALSE STATEMENT:

“ahead of the election local officials conduct logic and accuracy testing with bipartisan observers present ensuring tabulation equipment and the specific election data files perform properly and accurately the precinct voting process”<sup>17</sup>

### 2.5.2 TRUTH:

“Logic and accuracy testing” sufficient to ensure that the Dominion system performed “properly and accurately” clearly did not happen in Antrim County, Michigan. There was a 7,060 vote flip between the initially reported results and the final results.<sup>18</sup> Logic and accuracy testing with bipartisan oversight featuring all equipment responsible for tabulating the votes would have ostensibly detected the configuration mismatch which has been attributed as the root cause of the 7,060 vote flip. The fact of the matter is that logic and accuracy tests are not conducted upon all Dominion equipment necessary for tabulating precinct-level results.<sup>19</sup> In Detroit, for example, only the ImageCast Precinct (ICP) and ImageCast Central (ICC) machines were subject to public accuracy tests. Even then, in a city with 503 precincts, only 14 ICP machines and 1 ICC machine were publicly tested<sup>20</sup>. Precinct-level election results, however, are not available using only the ICP and ICC machines. Precinct-level results are only available from the Results and Tally Reporting (RTR) module found on EMS servers. The EMS server was NEVER

---

<sup>15</sup> December 15, 2020 testimony under oath by Dominion CEO John Poulos before the Michigan Senate Oversight Committee, Timestamp 19:50 (REF: <https://www.youtube.com/watch?v=s7scSfpwnqw>)

<sup>16</sup> Lake v Fontes, Petition for Writ of Certiorari (Exhibit H)

<sup>17</sup> December 15, 2020 testimony under oath by Dominion CEO John Poulos before the Michigan Senate Oversight Committee, Timestamp 21:46 (REF: <https://www.youtube.com/watch?v=s7scSfpwnqw>)

<sup>18</sup> Bailey v Antrim County, Plaintiff’s Collective Response to Defendants’ and Non-Party Counties’ Motions to Quash and For Protective Orders, Diagram 1 (See Exhibit I)

<sup>19</sup> <https://letsfixstuff.org/2022/11/election-results-are-missing-key-audit-trail-links/> (See Exhibit J)

<sup>20</sup> <https://letsfixstuff.org/2023/05/detroit-elections-smoke-and-mirrors/> (See Exhibit J)

## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

tested before “bipartisan observers” for logic and accuracy. Dominion internal emails<sup>21</sup> coupled with City of Detroit FOIA responses<sup>22</sup> indicate that precinct-level results for the City of Detroit are only available from the Wayne County EMS Server. Granted, the Dominion CEO does not personally oversee the conduct of logic and accuracy tests throughout Michigan. However, he testified under oath *during his prepared statement* as an authority as to what testing was conducted *not should be conducted* throughout the state. There is a big difference between testimony that says something DID happen versus testimony that says something SHOULD happen. The net effect of his false statement was to convince members of the committee that “logic and accuracy” testing was performed when it had not been performed. This false narrative was then propagated as the truth in subsequent media stories, Senate reports and court deliberations.

### 2.5.3 WHY FALSE STATEMENT IS MATERIAL FALSE STATEMENT

The false statement by Mr. Poulos that logic and accuracy testing sufficient to ensure that the tabulation of votes is performed properly and accurately is refuted by inaccurate results in Antrim County and failure to produce precinct level results from equipment subject to logic and accuracy testing in Detroit. The fact that Mr. Poulos issued this demonstrably false statement as part of his prepared remarks with legal counsel present demonstrates that his statement was pre-meditated and willful.

## 2.6 Antrim Modems

### 2.6.1 FALSE STATEMENT:

“secondly none of antrum's tabulators were connected to the internet. Antrim county does not have modems. They do not use modems”<sup>23</sup>

### 2.6.2 TRUTH:

Antrim County received a proposal for modems from Dominion<sup>24</sup>. Antrim County received an email from Dominion citing modem connection issues during the 2020 primary election.<sup>25</sup> Examination of the forensic images of Dominion equipment obtained during the Bailey v Antrim County lawsuit indicate that Antrim County Dominion systems were indeed connected to the internet.<sup>26</sup>

### 2.6.3 WHY FALSE STATEMENT IS MATERIAL FALSE STATEMENT

The fact that Mr. Poulos issued this demonstrably false statement as part of his prepared remarks with legal counsel present demonstrates that his statement was pre-meditated and willful.

---

<sup>21</sup> September 21, 2020 email from Cheryl Holmes to other Dominion employees, Subject “INTERNAL – Response DRAFT to Wayne County Clerk email” (See Exhibit K)

<sup>22</sup> City of Detroit FOIA Response (See Exhibit L)

<sup>23</sup> December 15, 2020 testimony under oath by Dominion CEO John Poulos before the Michigan Senate Oversight Committee, Timestamp 28:19 (REF: <https://www.youtube.com/watch?v=s7scSfpwngw>)

<sup>24</sup> Bailey v Antrim County, Antrim County, MI Dominion Equipment Quotes (Exhibit M)

<sup>25</sup> Bailey v Antrim County, Connectivity Issue Email (Exhibit N)

<sup>26</sup> Bailey v Antrim County, Forensic Analysis (Exhibit O)

# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## 2.7 Source Code

### 2.7.1 FALSE STATEMENT:

“our source code remains unchanged uh and that is exactly what post-election activities should verify after every election uh they they check that the hash code is exactly the same as the certification hash code and and that gives the local officials the the knowledge that the source code was exactly the source code that was certified and tested”<sup>27</sup>

### 2.7.2 TRUTH:

There is evidence that Dominion has deployed source code in support of an election that has not been certified and tested.<sup>28</sup>

### 2.7.3 WHY FALSE STATEMENT IS MATERIAL FALSE STATEMENT

The false statement by Mr. Poulos is simply a derivative of his previous false statement that his voting systems have undergone EAC accreditation is refuted by evidence of the deployment of voting system configurations that have not been properly certified.

The fact that Mr. Poulos repeats a demonstrably false statement that was part of his prepared remarks with legal counsel present demonstrates that his statement was a pre-meditated and willful attempt to promote his false narrative.

## 2.8 Vote Flipping

### 2.8.1 FALSE STATEMENT:

‘there's no flipping of any votes at any time on any system’<sup>29</sup>

### 2.8.2 TRUTH:

John Poulos' assertion that Dominion Voting Systems are incapable of flipping votes is contradicted by evidence from Antrim County, where a discrepancy involving 7,060 votes<sup>30</sup> initially reported in favor of Biden over Trump was attributed to the Dominion system. Despite the Michigan Department of State's clarification that the misreporting of unofficial results was due to an accidental error by the Antrim County clerk, further examination reveals that the issue stemmed from a system configuration mismatch<sup>31</sup>. This mismatch occurred when precinct totals were aggregated into county-wide totals for state reporting, facilitated by the election management system software—a component of the Dominion system<sup>32</sup>. Therefore, the incident in Antrim County demonstrates that not only is the Dominion system capable of causing vote flips, but it was indeed implicated in such an occurrence.

---

<sup>27</sup> December 15, 2020 testimony under oath by Dominion CEO John Poulos before the Michigan Senate Oversight Committee, Timestamp 1:05:14 (REF: <https://www.youtube.com/watch?v=s7scSfpwnqw>)

<sup>28</sup> Lake v Fontes, Petition for Writ of Certiorari (Exhibit H)

<sup>29</sup> December 15, 2020 testimony under oath by Dominion CEO John Poulos before the Michigan Senate Oversight Committee, Timestamp 1:06:19 (REF: <https://www.youtube.com/watch?v=s7scSfpwnqw>)

<sup>30</sup> Bailey v Antrim County, Plaintiff's Collective Response to Defendants' and Non-Party Counties' Motions to Quash and For Protective Orders, Diagram 1 (See Exhibit C)

<sup>31</sup> Bailey v Antrim County, Halderman Report on Antrim County, MI Election (See Exhibit P)

<sup>32</sup> “Antrim vote glitch: Expert shares how county mistakenly flipped from red to blue”, November 6, 2020, Paul Egan, Detroit Free Press (See Exhibit Q)



# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## 2.8.3 WHY FALSE STATEMENT IS MATERIAL FALSE STATEMENT

The false statement by Mr. Poulos is simply a derivative of his previous false statement that logic and accuracy testing was performed on his systems sufficient to determine the election results was properly and accurately performed.

The fact that Mr. Poulos repeats a demonstrably false statement that was part of his prepared remarks with legal counsel present demonstrates that his statement was a pre-meditated and willful attempt to promote his false narrative.

## 2.9 Ranked Choice Voting

### 2.9.1 FALSE STATEMENT:

“ranked choice voting is something completely different that was not used in Michigan”<sup>33</sup>

### 2.9.2 TRUTH:

Ranked Choice Voting may not have been advertised as active in Antrim County, but configuration logs indicate that Ranked Choice Voting features were enabled in Antrim County and were likely responsible for abnormally high adjudication rates.<sup>34</sup>

## 2.9.3 WHY FALSE STATEMENT IS MATERIAL FALSE STATEMENT

The false statement by Mr. Poulos that Ranked Choice Voting was not used in Michigan is refuted by redacted evidence submitted in Bailey v Antrim County lawsuit. Evidence was redacted on the basis of the false assertion that configuration logs are equivalent to source code. They are not. The repetition of this false assertion reflects willful intent to mislead officials as to the true configuration of their voting systems.

## 2.10 Ranked Choice Voting

### 2.10.1 FALSE STATEMENT:

“ranked choice voting is a requirement in some jurisdictions it was not used anywhere in Michigan”<sup>35</sup>

### 2.10.2 TRUTH:

Ranked Choice Voting may not have been advertised as active in Antrim County, but configuration logs indicate that Ranked Choice Voting features were enabled in Antrim County and were likely responsible for abnormally high adjudication rates.<sup>36</sup>

## 2.10.3 WHY FALSE STATEMENT IS MATERIAL FALSE STATEMENT

The false statement by Mr. Poulos that Ranked Choice Voting was not used in Michigan is refuted by redacted evidence submitted in Bailey v Antrim County lawsuit. Evidence was redacted on the basis of the false assertion that configuration logs are equivalent to source code. They are not. The repetition of

---

<sup>33</sup> December 15, 2020 testimony under oath by Dominion CEO John Poulos before the Michigan Senate Oversight Committee, Timestamp 1:06:22 (REF: <https://www.youtube.com/watch?v=s7scSfpwnqw>)

<sup>34</sup> Allied Security Operations Group Antrim Michigan Forensics Report, 12/13/2020 (See Exhibit R)

<sup>35</sup> December 15, 2020 testimony under oath by Dominion CEO John Poulos before the Michigan Senate Oversight Committee, Timestamp 1:08:02 (REF: <https://www.youtube.com/watch?v=s7scSfpwnqw>)

<sup>36</sup> Allied Security Operations Group Antrim Michigan Forensics Report, 12/13/2020 (See Exhibit R)



## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

this false assertion reflects willful intent to mislead officials as to the true configuration of their voting systems.

### 2.11 Internet Design

#### 2.11.1 FALSE STATEMENT:

“they are not designed to be connected to the outside world through either an internet connection or any other uh external connect connectivity device”<sup>37</sup>

#### 2.11.2 TRUTH:

The systems are designed to be connected to the internet.<sup>38,39</sup>

#### 2.11.3 WHY FALSE STATEMENT IS MATERIAL FALSE STATEMENT

The false statement by Mr. Poulos is simply a derivative of his previous false statement that his voting systems are not designed to be connected to the internet.

The fact that Mr. Poulos repeats a demonstrably false statement that was part of his prepared remarks with legal counsel present demonstrates that his statement was a pre-meditated and willful attempt to promote his false narrative.

### 2.12 Internet Connectivity

#### 2.12.1 FALSE STATEMENT:

“there is no internet connectivity at all”<sup>40</sup>

#### 2.12.2 TRUTH:

Dominion transfers component configuration updates, virtual machine images, and election results via internet-based ftps<sup>41</sup>, sftp<sup>42</sup> or ftp<sup>43</sup> services. Some states transfer election results via non-encrypted FTP connections. Any encryption-related file transfers are compromised by the fact that Dominion stores their decryption keys in plain text on their EMS servers.<sup>44</sup> This practice is the banking equivalent posting the passcode to the outside of a secure vault. Anyone with access to these keys is therefore able to modify election records without detection. Election results transfers are facilitated by “Listening Modules” that “listen” for internet-based updates from tabulators.<sup>45</sup> Special Counsel Justice Mike

---

<sup>37</sup> December 15, 2020 testimony under oath by Dominion CEO John Poulos before the Michigan Senate Oversight Committee, Timestamp 1:32:33 (REF: <https://www.youtube.com/watch?v=s7scSfpwnqw>)

<sup>38</sup> 4/4/2018 email from Dominion developer Ranko Stamatovic, Subject “RE: RTM – Listener certificate signing” (See Exhibit C)

<sup>39</sup> Contract 071B7700117 between The State of Michigan and Dominion Voting Systems (See Exhibit D)

<sup>40</sup> December 15, 2020 testimony under oath by Dominion CEO John Poulos before the Michigan Senate Oversight Committee, Timestamp 1:36:22 (REF: <https://www.youtube.com/watch?v=s7scSfpwnqw>)

<sup>41</sup> FTPS Communications (Exhibit S)

<sup>42</sup> SFTP Communications (Exhibit T)

<sup>43</sup> FTP Communications (Exhibit U)

<sup>44</sup> Lake v Fontes, Decryption Keys Evidence (Exhibit V)

<sup>45</sup> Contract 071B7700117 between The State of Michigan and Dominion Voting System (Exhibit W)

## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

Gableman noted in his report to the Wisconsin State Assembly that “contrary to what Dominion has publicly stated, that at least some machines had access to the internet on election night”.<sup>46</sup>

### 2.12.3 WHY FALSE STATEMENT IS MATERIAL FALSE STATEMENT

The false statement by Mr. Poulos is simply a derivative of his previous false statement that his voting systems are not designed to be connected to the internet.

The fact that Mr. Poulos repeats a demonstrably false statement that was part of his prepared remarks with legal counsel present demonstrates that his statement was a pre-meditated and willful attempt to promote his false narrative.

### 2.13 Internet Design

#### 2.13.1 FALSE STATEMENT:

“well the system as i said is designed not to be connected”<sup>47</sup>

#### 2.13.2 TRUTH:

The systems are designed to be connected to the internet.<sup>48,49</sup>

### 2.13.3 WHY FALSE STATEMENT IS MATERIAL FALSE STATEMENT

The false statement by Mr. Poulos is simply a derivative of his previous false statement that his voting systems are not designed to be connected to the internet.

The fact that Mr. Poulos repeats a demonstrably false statement that was part of his prepared remarks with legal counsel present demonstrates that his statement was a pre-meditated and willful attempt to promote his false narrative.

### 2.14 Standalone System

#### 2.14.1 FALSE STATEMENT:

“no they're not connect as i said they're not connected to the internet they're designed to be completely standalone system”<sup>50</sup>

#### 2.14.2 TRUTH:

The systems are designed to be connected to the internet.<sup>51,52</sup>

---

<sup>46</sup> Second Interim Investigative Report On the Apparatus & Procedures of the Wisconsin Election System, Delivered to the Wisconsin State Assembly on March 1, 2022, p. 13 (Exhibit X)

<sup>47</sup> December 15, 2020 testimony under oath by Dominion CEO John Poulos before the Michigan Senate Oversight Committee, Timestamp 1:38:51 (REF: <https://www.youtube.com/watch?v=s7scSfpwnqw>)

<sup>48</sup> 4/4/2018 email from Dominion developer Ranko Stamatovic, Subject “RE: RTM – Listener certificate signing” (See Exhibit C)

<sup>49</sup> Contract 071B7700117 between The State of Michigan and Dominion Voting Systems (See Exhibit D)

<sup>50</sup> December 15, 2020 testimony under oath by Dominion CEO John Poulos before the Michigan Senate Oversight Committee, Timestamp 2:51:57 (REF: <https://www.youtube.com/watch?v=s7scSfpwnqw>)

<sup>51</sup> 4/4/2018 email from Dominion developer Ranko Stamatovic, Subject “RE: RTM – Listener certificate signing” (See Exhibit C)

<sup>52</sup> Contract 071B7700117 between The State of Michigan and Dominion Voting Systems (See Exhibit D)

# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## 2.14.3 WHY FALSE STATEMENT IS MATERIAL FALSE STATEMENT

The false statement by Mr. Poulos is simply a derivative of his previous false statement that his voting systems are not designed to be connected to the internet.

The fact that Mr. Poulos repeats a demonstrably false statement that was part of his prepared remarks with legal counsel present demonstrates that his statement was a pre-meditated and willful attempt to promote his false narrative.

## 2.15 Background Checks

### 2.15.1 SENATOR McBROOM QUESTION:

“how are the employees um not so much for well even at dominion how do you go about checking them make sure that they don't have foreign connections i think that was a question that senator tice kind of started on but then went in a different direction

so what is your process for assuring that the there isn't some sort of illicit influence or going on with the programming”

### 2.15.2 FALSE STATEMENT:

“we do very extensive background checks on our employees uh through third parties uh this is part of our uh voluntary disclosure that we have with uh our state partners as it pertains to our contract employees we employ third-party temp firms and part of their obligations and accountabilities to do background checks criminal checks and the like”<sup>53</sup>

### 2.15.3 TRUTH:

Dominion has employees in Belgrade, Serbia and Toronto, Canada actively involved in the programming of their software and election support operations.<sup>54</sup> The fact that they have offices in Serbia and Canada denotes that they do indeed have “foreign connections”.

The Senator was clearly seeking assurance from Dominion that these foreign connections did not exist but Poulos gave him the false assurance that background checks would preclude any of these “foreign connections”. Failure to provide a direct answer to address the Senator’s concerns regarding “foreign connections” is not perjury. However, his assertion that “extensive background checks on our employees” were performed is not true. Due to provisions of Serbian law, employers can only ask employees for full name and email address.<sup>55</sup>

## 2.15.4 WHY FALSE STATEMENT IS MATERIAL FALSE STATEMENT

The false statement by Mr. Poulos regarding extensive background checks on his employees is refuted by internal Dominion communications and Serbian law prohibiting such background checks. The fact that he dodged the fact that Dominion developers were outside the United States indicates a willful intent to avoid disclosure of such restrictions.

---

<sup>53</sup> December 15, 2020 testimony under oath by Dominion CEO John Poulos before the Michigan Senate Oversight Committee, Timestamp 2:59:45 (REF: <https://www.youtube.com/watch?v=s7scSfpwnqw>)

<sup>54</sup> Evidence of Dominion developers working in Serbia (See Exhibit Y)

<sup>55</sup> Evidence of Serbian restrictions on background checks (See Exhibit Z)

# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## 3 Conclusion

John Poulos has engaged in conduct that, as documented, appears to meet the statutory elements of perjury under MCL 750.423. On the basis of case law precedent, his testimony also likely violates the tenets of MCL 750.422 and 750.426. Specifically, Mr. Poulos made numerous statements that are alleged to be false. These statements were not casual remarks but were made during formal proceedings, as evidenced by their inclusion in his prepared opening remarks and the presence of legal counsel, indicating willful intent as well as an understanding of the gravity and legal implications of his testimony.

The material nature of Mr. Poulos's statements is evidenced by their significant impact on the integrity of the electoral system, as well as the financial, professional, and reputational damages incurred by individuals and entities attempting to address and correct the misinformation disseminated by Mr. Poulos. The propagation of these alleged falsehoods into legal cases, official reports, and media narratives underscores their materiality, as they have influenced public perception and legal proceedings.

Furthermore, the willfulness of Mr. Poulos's actions is suggested by the deliberate and strategic manner in which the statements were crafted and disseminated to establish and reinforce a specific public narrative. This narrative, rooted in the alleged false statements, has been utilized in election fraud cases and defamation suits, indicating an intent to deceive and mislead.

Given the serious consequences of Mr. Poulos's alleged false statements and their alignment with the elements of perjury as defined by MCL 750.423, it is imperative that these actions be subject to legal scrutiny. Prosecution to the full extent of the law is warranted to uphold the integrity of the judicial system and the rule of law.

# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## Exhibits

### Exhibit A: Dominion Internal Emails Indicating Remote Access to Ballot Scanning Equipment

Internal Dominion communications revealed that Serbian developers had the ability to perform end-to-end testing on a system located in Colorado.

**To:** Nenad Matic[[nenad.matic@dominionvoting.com](mailto:nenad.matic@dominionvoting.com)]; Goran Obradovic[[goran.obradovic@dominionvoting.com](mailto:goran.obradovic@dominionvoting.com)]; Maja Bajovic[[maja.bajovic@dominionvoting.com](mailto:maja.bajovic@dominionvoting.com)]; Rade Djermanovic[[rade.djermanovic@dominionvoting.com](mailto:rade.djermanovic@dominionvoting.com)]  
**Cc:** Djordje Matijevic[[djordje.matijevic@dominionvoting.com](mailto:djordje.matijevic@dominionvoting.com)]; Sanja Sobotovic[[sanja.sobotovic@dominionvoting.com](mailto:sanja.sobotovic@dominionvoting.com)]  
**From:** Ranko Stamatovic  
**Sent:** Wed 4/22/2020 10:10:54 AM  
**Subject:** RE: CO - testiranje

Ne morale odmah da forsirate 22" ...  
Hajde da utvrdimo da system elementarno radi end-to-end ...  
pa cemo posle da gledamo da radimo ove malo teze stvari...

You don't have to be 22" right now.  
Let's find that the system elementary works end-to-end ...  
We'll see if we can do these things...

Communications from VP of Engineering and GM Europe, Goran Obradovic, regarding Dominion election equipment installed in Chicago indicates that he and his team (remember, he is "GM Europe") "will try to increase that to 2 and see if this is helping". This indicates that he and "his team" had remote access to the Chicago election equipment that processed ballots less than 3 days before the November 3, 2020 election. Whether or not the team members he alludes to reside in Toronto or Belgrade, it is clear that they had remote access to ballot scanning devices across county and state lines.

## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

**To:** Goran Obradovic[[goran.obradovic@dominionvoting.com](mailto:goran.obradovic@dominionvoting.com)]; Alex Soto Vasquez[[alex.sotovasquez@dominionvoting.com](mailto:alex.sotovasquez@dominionvoting.com)]; Mark McKinney[[mckinney@dominionvoting.com](mailto:mckinney@dominionvoting.com)]; Paul Chavez-Casanova[[paul.chavez-casanova@dominionvoting.com](mailto:paul.chavez-casanova@dominionvoting.com)]; Sheannse Smith[[SmithsSheannse.smith@dominionvoting.com](mailto:SmithsSheannse.smith@dominionvoting.com)]; Martijn Punt[[martijn.punt@dominionvoting.com](mailto:martijn.punt@dominionvoting.com)]  
**Cc:** Xenofon Marangos[[xenofon.marangos@dominionvoting.com](mailto:xenofon.marangos@dominionvoting.com)]  
**From:** Eric Coomer  
**Sent:** Sat 10/31/2020 6:27:01 PM  
**Subject:** RE: Chicago EV tabulators.

Thanks Goran. Yes, any further performance tweaks/testing would be much appreciated. I don't mind working through the night on Monday, but we're already short-handed and we'll need to sleep at some point before polls close on election day.

Again, if RTR can handle exporting loaded files while still importing additional files, we can at least work somewhat in parallel which should help in the overall time. Obviously my biggest concern is if we're still trying to load EV results when polls close and getting clobbered by the listener etc.

ERIC D. COOMER | DIRECTOR, PRODUCT STRATEGY AND SECURITY

DOMINION VOTING  
1201 18th Street, Suite 210, DENVER, CO 80202  
1.866.654.8683 | [DOMINIONVOTING.COM](http://DOMINIONVOTING.COM)

720.201.1728 MOBILE

---

**From:** Goran Obradovic <[goran.obradovic@dominionvoting.com](mailto:goran.obradovic@dominionvoting.com)>  
**Sent:** Saturday, October 31, 2020 12:19 PM  
**To:** Eric Coomer <[eric.coomer@dominionvoting.com](mailto:eric.coomer@dominionvoting.com)>; Alex Soto Vasquez <[alex.sotovasquez@dominionvoting.com](mailto:alex.sotovasquez@dominionvoting.com)>; Mark McKinney <[mark.mckinney@dominionvoting.com](mailto:mark.mckinney@dominionvoting.com)>; Paul Chavez-Casanova <[paul.chavez-casanova@dominionvoting.com](mailto:paul.chavez-casanova@dominionvoting.com)>; Sheannse Smith <[sheannse.smith@dominionvoting.com](mailto:sheannse.smith@dominionvoting.com)>; Martijn Punt <[martijn.punt@dominionvoting.com](mailto:martijn.punt@dominionvoting.com)>  
**Cc:** Xenofon Marangos <[xenofon.marangos@dominionvoting.com](mailto:xenofon.marangos@dominionvoting.com)>  
**Subject:** Re: Chicago EV tabulators.

I think that one with 27k is from 4 machines. Our calculation is that until EV polls are closed we will have up to 6000 ballots per EV machine (on average). So that is 2x less than our tests. Also with time loading is going down to 24 to 25 min (for our 12k test). All this is with multiprocessing factor of 1. Tomorrow we will try to increase that to 2 and to see if this is helping.  
G

GORAN OBRADOVIC | VP ENGINEERING AND GM EUROPE  
DOMINION VOTING  
215 Spadina Avenue, Toronto, Ontario, M5T 2C7  
1.866.654.8683 | [DOMINIONVOTING.COM](http://DOMINIONVOTING.COM)  
866.654.8683 OFFICE (ext 401)

---

## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

### Exhibit B: Fulton County, PA

On pages 18-19 of *Fulton County v Dominion Voting Systems*, plaintiffs cited evidence of remote connections to a Canadian IP address.

73. The September Report further determined that “[a]n external IP address that is associated with Canada is found on the Adjudication01 [workstation]” and “[t]his shows that at least one of the network devices has connected to an external device on an external network” and that this was the same device that the post-certification python script was found on. *Id.*, ¶ 7. Among other findings, this constituted a direct violation of and failure of the conditions required for certification in the Dominion Certification Report, see **EXHIBIT B**, pp. 40-50, ¶ C.

74. The log files for the Adjudication device showed an IP address of 172.102.16.22, which derives from a location in Quebec, Canada and that this

18

---

revealed a serious issue to be connected remotely to a Canadian system. *Id.* at p. 4. The report cannot determine when this connection occurred nor what data was transmitted, but this remote access did occur. *Id.* Among other findings, this constituted a direct violation of and failure of the conditions required for certification in the Dominion Certification Report, see **EXHIBIT B**, pp. 40-50, ¶



# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## Exhibit C: Emails from Dominion Developer on Internet Design

Internal Dominion email from Dominion developer Ranko Stamatovic clearly indicates that Dominion systems are no longer closed systems because they are sending election results via the internet. This internal Dominion email effectively contradicts Mr. Poulos' assertion that voting systems are not closed systems and they are indeed designed to connect to the internet. Dominion systems are clearly connected to the internet in order to transmit results from the tabulators or the Election Management System (EMS) Results Transfer Managers (RTM).

From: Ranko Stamatovic [ranko.stamatovic@dominionvoting.com]  
Sent: 4/4/2018 1:06:10 PM  
To: Paul Chavez-Casanova [paul.chavez-casanova@dominionvoting.com]; Ivan Bulut [ivan.bulut@dominionvoting.com]  
CC: Martijn Punt [martijn.punt@dominionvoting.com]; Ruzica Matic [ruzica.matic@dominionvoting.com]; Dave Anderson [dave.anderson@dominionvoting.com]  
Subject: RE: RTM - Listener certificate signing

When we talk about certificates in general ~ Dominion is not the certificate issuer. Actually, we can create certificate, but - level of trust can be problematic... Different people (users) have different perspective what certificate means and how it should be obtained.

One more thing - when we are sending election results through **Internet** (from tabulators or RTM), this is not closed system any more.

Therefore, my general approach to this problem is:

- do not assume anything regarding who/how/when certificate should be created/obtained,
- do not assume anything regarding the name of the certificate
- Our system should be able to:
  - o import any provided certificate (but first to check validity), or/and
  - o Create certificate on simple and intuitive way. Furthermore, implement logic that the same certificate is be copied to exact location where, EMS will pick it up, when prepare definition files for tabulators/RTM...

Ranko

Review of issue logs tracked by Dominion employees indicates that the Dominion ImageCast Precinct (ICP) ballot scanner is *designed* to “connect automatically (to the Listener) without user interaction”. Anyone with remote access to the ballot scanner would also have access to the ballot images stored on the ballot scanner and have the ability to modify those images. The Dominion ImageCast Listener (ICL) is *designed* to constantly monitor modem connections from ICP devices. The Dominion Election Management System (EMS) Server can be configured to transmit election records “when the polls are open”. The design of Dominion voting systems is clearly not that of a closed system without any ability to connect to the internet.

## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

### ICP:

- The ICP should be capable of turn on with the modem connected.
- Once the polls are open, the ICP should check for the modem and if the modem is connected automatically transmit the configuration to the Listener without user interaction, if the modem is not connected, the transmission process will be skipped (no notification).
- An manual option to transmit configuration needs to be added in the Polls worker menu.

### -ICL:

- A new transmission type needs to be added in the ICL system to support configuration transmissions
- The Dashboard should display records of configurations transmitted.
- If configurations and results have been transmitted by the same ICP, the filter options should allow to generate reports by either criteria
- The export functionality should allow to generate report of configuration for tracking purposes during the day
- Information related to configurations should be saved in different tables.

### -EMS:

- The option to whether transmit the configuration or not when the polls are open, should be manage in EMS via DCF parameter

# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## Exhibit D: Contract between Dominion Voting Systems and the State of Michigan

Contract 07B7700117 between Dominion and the State of Michigan includes numerous illustrations of how Dominion Voting Systems including Election Night Reporting, Listening Modules, and EMS servers are designed to connect to the internet. Notably, every single configuration of the EMS Server features an internet connection.



### Election Night Reporting

As an optional additional feature, Dominion offers enhanced Election Night Reporting tools to create an Internet-based graphical display of results, which provides an attractive and dynamic focus on election night. Our cross-platform (mobile-friendly) results display based in HTML5 is our standard and most popular configuration. The report display runs in real-time on the Internet, updating as results are released from the results tally module by officials. It can be projected on public display screens, such as County Offices, fed to local television stations, and displayed on the county or state's website. Dominion has different report layouts available, and can configure the display with the jurisdiction's logos and colors.



The Internet-based graphical display is completely automated and runs behind the scenes. Once election officials have released a set of results, XML files are created and transferred to a local FTP directory (or via an external memory device), and the graphical display is automatically updated. This XML file is in an internationally defined election format called EML (Election Markup Language). As such, the election results are transferred in a format that can be easily read by news media, if they wish to import the XML files into their own display program (or they can simply use your Dominion graphical report for broadcast).

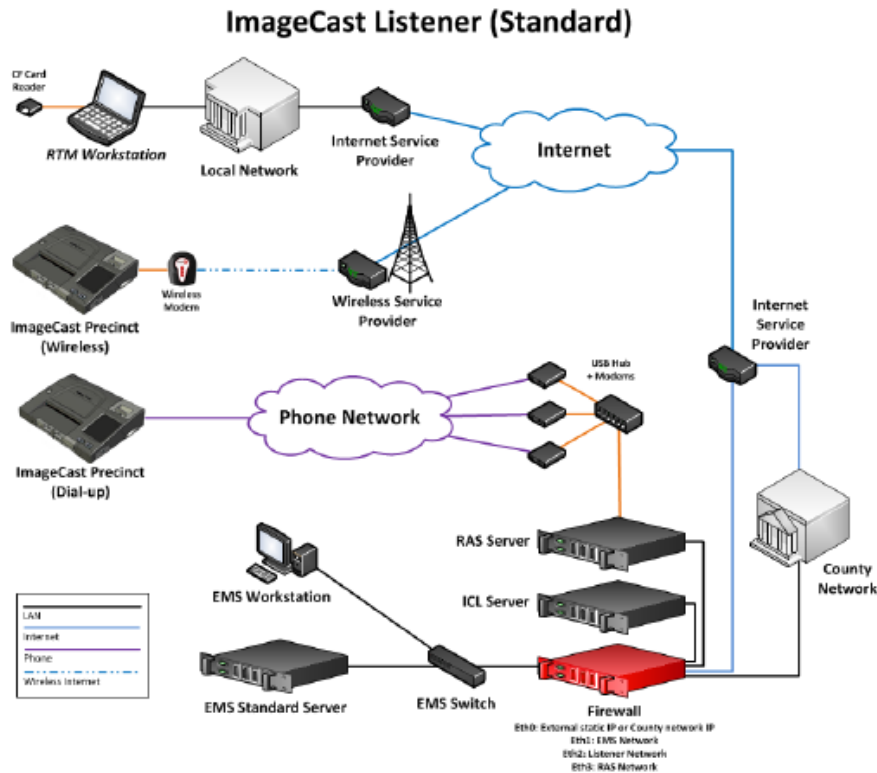


The EMS Results Transfer Manager (RTM) application requires the following components:

- Laptop (with internet access)
- Compact Flash (CF) card reader/writer

Complete instructions for installing and configuring the ImageCast Listener and RAS servers can be found in the system installation documents (*2.08 ImageCast Listener System Operation Procedures, RAS Installation and Configuration Procedure and EMS RTM User's Guide*).

Note: these documents currently describe the configuration steps using screenshots from Microsoft Windows Server 2008 R2 Standard, however the 5.0-S system uses Microsoft Windows Server 2012 R2 Standard. The configuration steps are the same on both platforms.

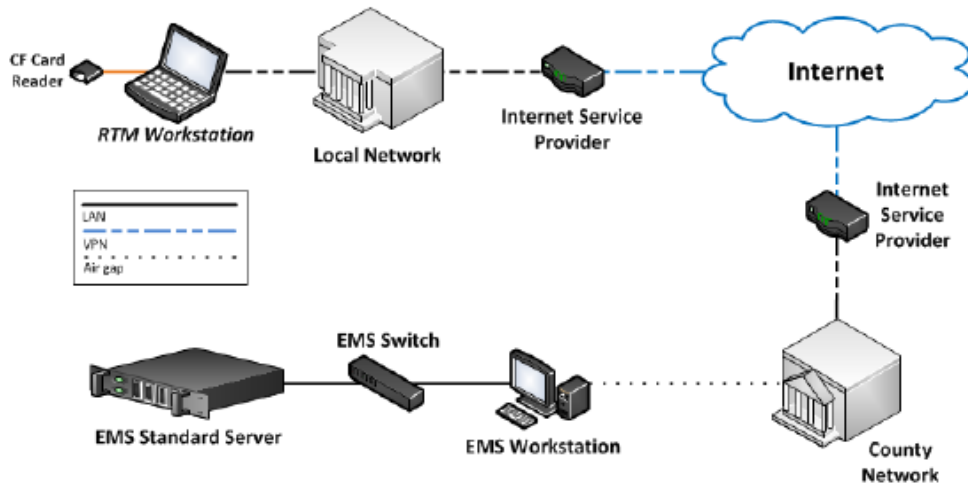




EMS Results Transfer Manager With VPN Network

A purely LAN-based solution can be implemented using the RTM application, which allows jurisdictions to load results from ImageCast Precinct memory cards at a regional office and send those results to a local folder or a shared network folder within a secure Virtual Private Network (VPN). This solution does not require the ImageCast Listener on the receiving end. Received results files are manually copied from the shared folder on the jurisdiction's secure network to the EMS Workstation machine using a removable medium, and loaded into the EMS Results Tally and Reporting application.

**EMS Results Transfer Manager (VPN Network)**



It is entirely the jurisdiction's responsibility to set up the required infrastructure for linking remote locations in a wide-area network (for example, creating secure VPN tunnels between offices). Dominion can work with IT departments to plan these solutions, but due to the variability of the networking and firewall equipment used by different jurisdictions, cannot take responsibility for directly configuring or maintaining the jurisdiction's VPN infrastructure.

When RTM is used to transmit results to a shared network folder, without the ImageCast Listener, the Dashboard is not available. Progress of results files can be tracked in EMS Results Tally and Reporting as they are loaded into the system.

# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## Cost Table 5 – EMS Network Configuration Options Dominion Voting Systems

### Democracy Suite Sample Configuration for Michigan

The following Democracy Suite® Configurations are samples based on estimated needs of the counties and local jurisdictions. These configurations can be further adjusted according to the specific components required for each county. They have been simplified to illustrate the major components required in each location.

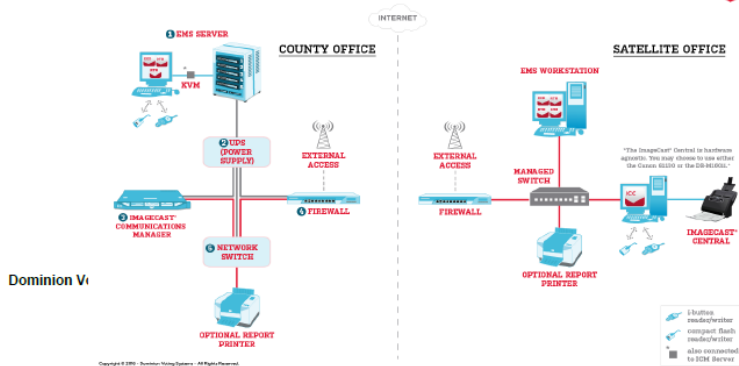
#### Configuration 1

Democracy Suite® Components located at the County/central office and/or local satellite office (city or township) for larger jurisdictions:

- EMS Standard (with client station)
- EMS Express (no client station)
- Listener (wireless modems only)
- ICC (M160-II) for AVCB

Please see below for the Configuration diagram.

State of Michigan - Democracy Suite® System Configuration 1



Dominion V

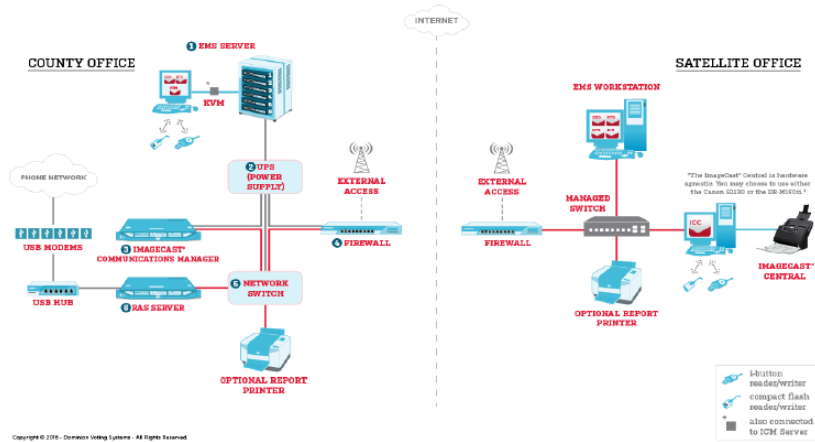
#### Configuration 2

Democracy Suite® Components located at the County/central office and/or local satellite office (city or township) for larger jurisdictions:


- EMS Standard (with client station)
- EMS Express (no client station)
- Listener (wireless and analog modems)
- ICC (M160-II) for AVCB

See below for the Configuration Diagram.

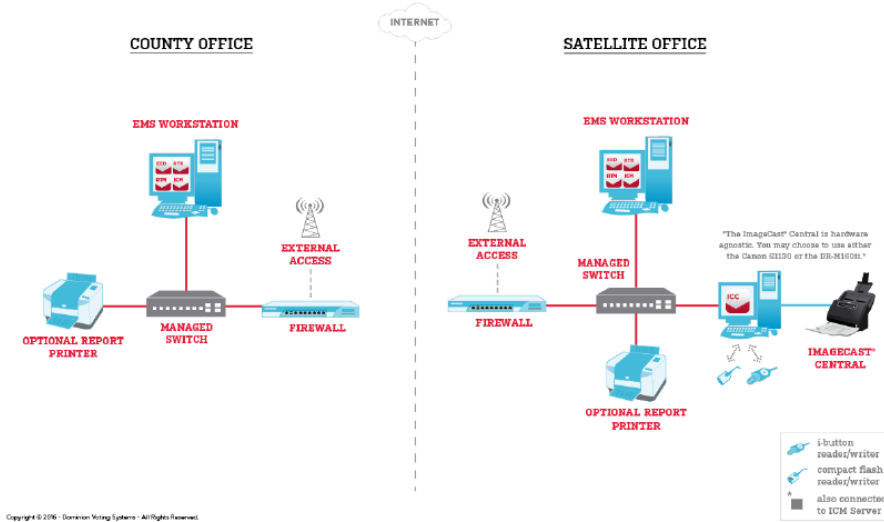
State of Michigan - Democracy Suite® System Configuration 2



# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

CONTRACT #071B7700117 

State of Michigan - Democracy Suite® System Configuration 3

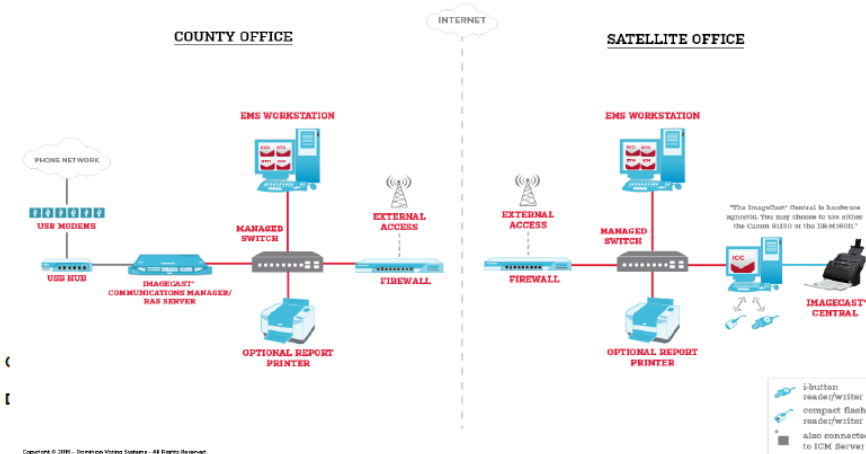


CONTRACT #071B7700117 

- EMS Express (no client station)
- Listener (wireless and analog modems)
- ICC (M160-II) for AVCB

Please see below for the Configuration diagram.

State of Michigan - Democracy Suite® System Configuration 4





## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

### Exhibit E: Bailey v Antrim County, Lenberg #2

John Poulos clearly states that it is not possible to switch votes. In Bailey v Antrim County, Jeff Lenberg demonstrates how Microsoft SQL Server Management Studio (SSMS) software installed on Dominion EMS servers provide the ability to switch votes without detection.

April 7, 2021

Jeff Lenberg conducted a test that demonstrated the vote flip in Antrim County was not "human error" and the general election was not "the safest election in history." Rather, the test confirmed that the vote tally errors observed in Antrim County on November 3, 2020 were most likely the result of technical manipulation of the election project file; not human error and not a computer glitch. By conducting a series of tests, Plaintiff's experts were able to replicate the vote tally errors through a method wholly contrary to the "human error" narrative proposed by Alex Halderman.

You can view the video here:

<https://www.depernelaw.com/dominion.html>

This video demonstrates fraud in the election process and vote tabulation process. These tests show the following:

1. Ballots were fed into the tabulator at the precinct/township level.

BIDEN ballots: 2

TRUMP ballots: 4

JORGENSEN ballots: 1

2. Ballots were counted by the tabulator without error.

3. The election was then closed and the tally tape printed from the tabulator. It shows the following results:

BIDEN: 4 votes

TRUMP: 2 votes

JORGENSEN: 1 vote

4. But even more interesting, we can "flip" the votes in any manner within the same race. We can give all the votes to Jorgenson. We can give all of the votes to Trump. We can give all of the votes to Biden.

5. The system and election can be entirely compromised utilizing an easy and quick bypass of all security protocol.

6. The manipulated vote count can then be transferred to the EMS.

7. This means that the "flip" will never be caught by the canvass board. There will be no reason to doubt the election results because the number of votes on the printed tape will match the number of votes in the poll pad.

8. We also intentionally swapped the votes in the Congressional race

9. We intentionally kept clean results in the US Senate race

We did this demonstration to show that we can swap votes in any race we want; up-ballot or

down-ballot. We can pick and choose which races we affect.

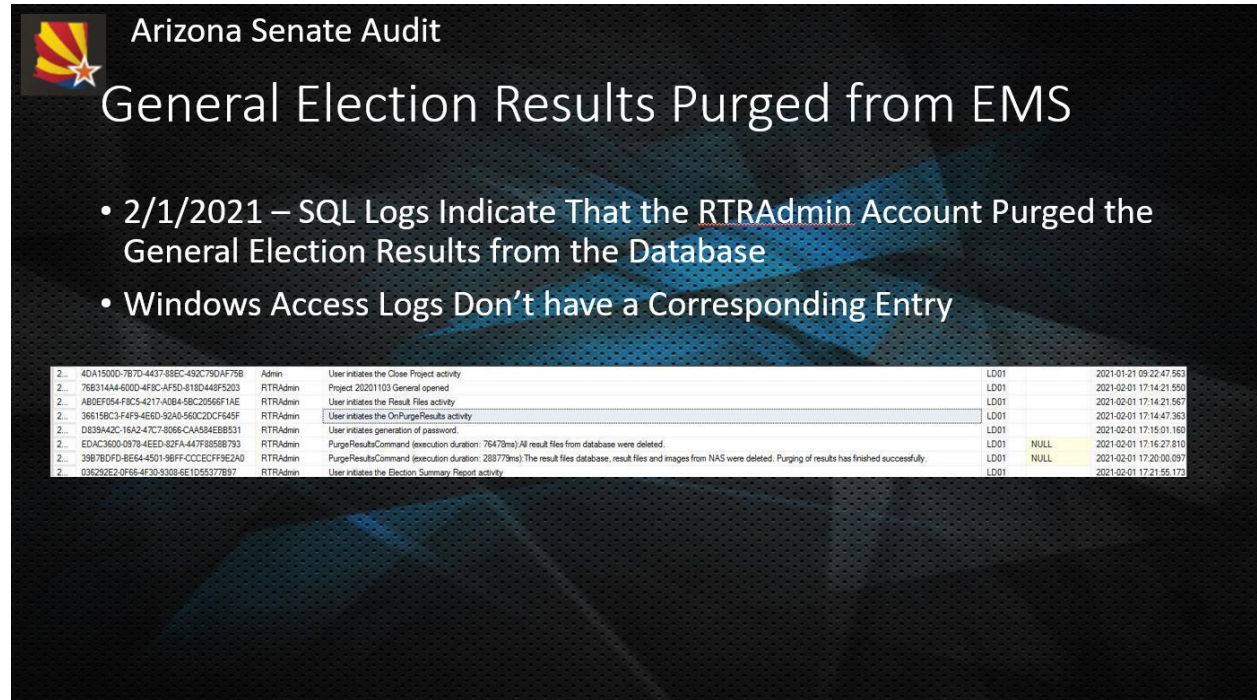
# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## Exhibit F: AZ Senate Hearing on Maricopa County, AZ Election Audit

Auditors working on behalf of the Arizona Senate presented their findings in an audit of the 2020 General Election in Maricopa County, AZ. The full proceedings can be viewed at:

[https://www.youtube.com/watch?v=PG\\_uvVthV68](https://www.youtube.com/watch?v=PG_uvVthV68)

Cybersecurity professional Ben Cotton presented evidence of the deletion of audit records from the Maricopa County Dominion EMS server. The deletion of these audit records ensures that it is indeed possible to replace the actual election outcome with an alternate election outcome.



**Arizona Senate Audit**

## General Election Results Purged from EMS

- 2/1/2021 – SQL Logs Indicate That the RTRAdmin Account Purged the General Election Results from the Database
- Windows Access Logs Don't have a Corresponding Entry

2...	4DA1500D-787D-4437-89EC-492C79DAF75B	Admin	User initiates the Close Project activity	LD01		2021-01-21 09:22:47.553
2...	76B314A4-600D-4F8C-AF5D-818D448F5203	RTRAdmin	Project 20201103 General opened	LD01		2021-02-01 17:14:21.550
2...	AB0E054-F8C5-4217-A0B4-58C2D566F1AE	RTRAdmin	User initiates the Result Files activity	LD01		2021-02-01 17:14:21.567
2...	366158C3-F4F9-4E6D-92A0-56C2DC6F645F	RTRAdmin	User initiates the OnPurgeResults activity	LD01		2021-02-01 17:14:47.363
2...	D638A42C-16A2-47C7-9066-CA584EBB531	RTRAdmin	User initiates generation of password.	LD01		2021-02-01 17:15:01.160
2...	EDAC360D-0978-4EED-82FA-447F8558B793	RTRAdmin	PurgeResultsCommand (execution duration: 764.79ms) All result files from database were deleted.	LD01	NULL	2021-02-01 17:16:27.810
2...	39878DFD-8E54-4501-96FF-CCCECF99E2A0	RTRAdmin	PurgeResultsCommand (execution duration: 283.73ms) The result files database, result files and images from NAS were deleted. Purging of results has finished successfully.	LD01	NULL	2021-02-01 17:20:00.097
2...	030292E2-0F66-4F39-8398-6E1D45377897	RTRAdmin	User initiates the Election Summary Report activity	LD01		2021-02-01 17:21:55.173

# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## Exhibit G: Mesa County, CO Report #2

The Dominion EMS Server in Mesa County, CO was also analyzed via forensic cyber experts. Their analysis was summarized in a series of three reports accessible at the following website: <https://tinapeters.us/reports/>

Page 68 of Report #2 revealed that the presence of SQL Server Management Studio combined with lax security practices enables the alteration of election outcomes without a trace.

**CONFIDENTIAL**

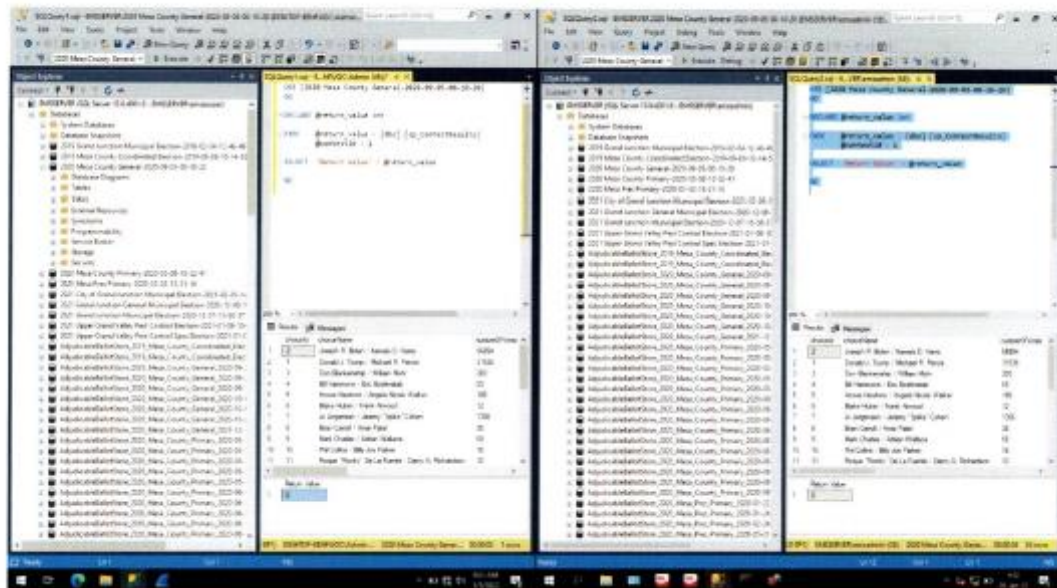


Figure 43 - From a separate Windows computer, the databases can be accessed and reports run.

**To confirm this is the data directly from the EMS server, the same report is run on both systems. They both report identical information from the database.**

The results display the database in the altered state in which it was left, showing the flipped 56,894 votes for Biden and 31,536 for Trump from the test illustrated in Figure 28.

**Finding 5: The security configuration of the Mesa County EMS server permitted access to election data and records from a separate computer not part of the DVS D-Suite system.**

## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

### Exhibit H: Lake v Fontes Certification Issues

Page 12 of the Lake v Fontes petition to the Supreme Court of the United States cites evidence that uncertified software was used in the 2020 and 2022 elections in Maricopa County, AZ.

- In place of the Arizona-certified election software that Maricopa claimed to use, Maricopa's election software has been surreptitiously altered with respect to components controlling how ballots are read and tabulated. The election results put through this uncertified software are unreliable. Contrary to Maricopa's representations to the district court, the election software Maricopa used in the 2020 election is not approved by the EAC or for use in Arizona in violation of Arizona law.<sup>3</sup> The SLOG files show that Maricopa used the same uncertified software in the 2022 election.

Pg. 12

## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

### Exhibit I: Antrim County Vote Tallies

There were 4 distinct vote tallies conducted in Antrim County, MI for the results of the 2020 general election. In the presidential race between Joe Biden and Donald Trump, the final vote tally indicates that the initial vote tally flipped 7,060 votes from Donald Trump to Joe Biden.

DIAGRAM 1:

Date	Registered Voters	Total Votes Cast	Biden	Trump	Third Party	Write-In	TOTAL VOTES for President
Nov 3	22,082	16,047	7,769	4,509	145	14	12,423
Nov 5	22,082	18,059	7,289	9,783	255	20	17,327
Nov 21	22,082	16,044	5,960	9,748	241	23	15,949
Dec 17	22,082		5,959	9,759	244	20	15,962

30

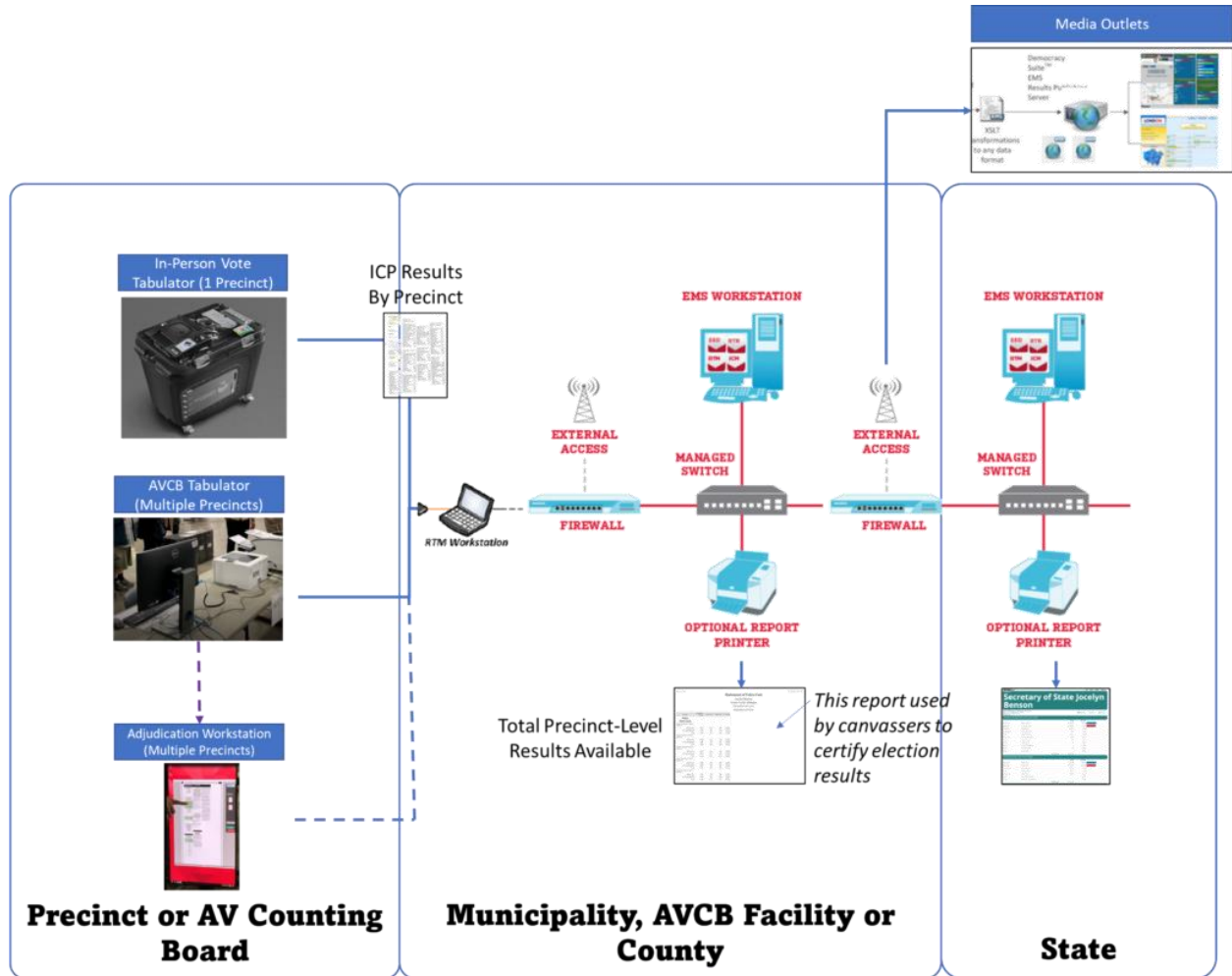
[https://www.depernolaw.com/uploads/2/7/0/2/27029178/collective\\_response\\_to\\_motions\\_for\\_protective\\_order\\_040921.pdf](https://www.depernolaw.com/uploads/2/7/0/2/27029178/collective_response_to_motions_for_protective_order_040921.pdf)

# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## Exhibit J: Detroit Elections Process

The Detroit elections process features a significant number of audit trail gaps. These gaps are detailed with references to Dominion documentation and official election records in the following post:

<https://letsfixstuff.org/2022/11/election-results-are-missing-key-audit-trail-links/>



Additional details on the significant gaps in the vote tally chain of custody can be found in the following post:

<https://letsfixstuff.org/2023/05/detroit-elections-smoke-and-mirrors/>



# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## Exhibit K: Dominion Overview of Detroit Election Process

In an email from Dominion employee Cheryl Holmes, she goes over the process of tallying the votes in the City of Detroit. The process of tallying the votes involves a variety of devices including ICP, ICC, and EMS Servers featuring RTR modules. RTR modules were never tested for accuracy in Detroit before bipartisan observers.

---

**From:** Cheryl Holmes <[cheryl.holmes@dominionvoting.com](mailto:cheryl.holmes@dominionvoting.com)>  
**Sent:** Monday, September 21, 2020 2:18 PM  
**To:** Tim Baumbach <[tim.baumbach@dominionvoting.com](mailto:tim.baumbach@dominionvoting.com)>; David Stahl <[david.stahl@dominionvoting.com](mailto:david.stahl@dominionvoting.com)>; Nicole Nollette <[nicole.nollette@dominionvoting.com](mailto:nicole.nollette@dominionvoting.com)>; Darren Silverburg <[darren.silverburg@dominionvoting.com](mailto:darren.silverburg@dominionvoting.com)>; Megan Hanna <[megan.hanna@dominionvoting.com](mailto:megan.hanna@dominionvoting.com)>  
**Subject:** INTERNAL - Response DRAFT to Wayne County Clerk email -

All ~

Please see below the draft response to the email sent from the Wayne County Clerk. The original email is attached.  
Your comments and edits are appreciated. I would like to send it out tomorrow morning if possible. If the response should be sent from someone other than myself, please advise.

Thank you  
Cheryl

«DRAFT»

*Dear Clerk Garrett,*

*Thank you for sharing your concerns regarding the City of Detroit Absentee Counting Board process. We include our responses below to your questions and concerns regarding the use of the DSuite systems: ICC high speed scanner/tabulator, adjudication system, RTR and EMS/Server. We had one initial Zoom meeting call with the City last week to discuss the AVCB. System functionality, best practices and questions regarding the system use and capability were discussed. Our emphasis overall has been that they prepare a thorough and organized approach, implement multiple layers of physical and operational security and absolute confirmation of the accuracy of any reports or results before release.*

*Dominion's customer commitment is to ensure that all users are provided the knowledge, best practice guidance and support in the correct use of the systems and software toward accurate and successful elections. Our onsite support for the City's November election is of the highest caliber and will assist the City Lead in the administration of the DSuite systems as well as troubleshoot and resolve any system issues that may arise.*

*Please see our responses below: If you have further questions, we welcome any discussion.*

*Thank you*

*Cheryl Holmes*

1. Will the City of Detroit perform a complete adjudication extract of all their AVCB's each time they want to export?



## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

*The City wants to provide results from AVCB tabulators as batches are fully processed (scanned or scanned and adjudicated). This may or may not include full AVCB precincts depending on the time of the export of results files from RTR.*

*The City would be best to answer how they will manage the AVCBs.*

2. Has any of Dominion's customers performed adjudication exports throughout an election night at the scale of what the City of Detroit is intending to do?  
*The results files of completed, fully adjudicated ICC scanned batches are validated, published, and exported from RTR, not adjudication. In the absentee tally process, most Dominion customers export full precincts or ballot styles/types. The scale of results file export generation would be best answered by the City of Detroit*
3. To perform the adjudication export, do all adjudication stations have to cease adjudicating in order to initiate and complete the file export each time?
  - a. If so, has the City shared how they will administratively organize, communicate and ensure its proper application?
  - b. Is there any concerns regarding stresses on the EMS System/Server stopping and starting every 15 minutes?

*The results files of completed, fully adjudicated ICC scanned batches are validated, published, and exported from RTR, not adjudication. ICC scanning and adjudication workstations do not have to cease operations. They continue to process batches and adjudicate ballots without affecting the results file export in RTR.*

*The results export process is conducted in RTR on the EMS System Server without stopping the server.*

4. Are there any issues that Dominion or their customers have experienced exporting adjudication files throughout an election night?  
*Results files are exported from RTR, not adjudication. Adjudication files, once complete and submitted within the application, automatically transfer to RTR. We have not seen any issues related to that process.*
5. The City intends to upload an adjudication files to the County's FTPS every 15 minutes, the County will be following its previous protocols of loading hourly, does RTR prevent multiple adjudicated files from doubling the same batch results?  
*The City intends to upload an adjudication files to the County's FTPS every 15 minutes, The City would be best able to provide the frequency of the results file uploads to the FTPS that they intend to implement.*

*the County will be following its previous protocols of loading hourly, does RTR prevent multiple adjudicated files from doubling the same batch results?*

*The same as in the County's EMS system, RTR prevents the upload files that have already been loaded. RTR will display an error message stating that these files already exist in the system and will not allow them to be uploaded or validated.*

6. Is there any limitation on the number or frequency of adjudication exports the EMS system can handle?  
*Results files are exported from RTR, not adjudication. The EMS system does not have a limit on the frequency or number of results files exports. The frequency of exports is usually determined by the time to complete the physical processes to generate the export, print the summary report and confirm results accuracy before uploading.*
7. What are the implications if the City of Detroit accidentally closes out adjudication before the conclusion of the election?  
*If the adjudication application is stopped or closed before the conclusion of tabulation, it can be*

## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

*restarted or reopened without effect. The batches that are pending adjudication remain in queue. When the application is reopened, the batches waiting on adjudication are displayed and ready to adjudicate. Processing would continue as before.*

8. The County is very concerned with the City of Detroit closing a tabulator in EMS while results are still being processed by the AVCB.
  - a. What safety protocols does Dominion advise to make sure the customer does not close a AVCB in EMS before all ballots have been tabulated? This is particularly concerning for it could damage public confidence if an AVCB is reporting it is at 100%, yet the results continue to increase throughout the night.

*In the City of Detroit, each ICCAVCB tabulator file will be programmed by precinct(s). Ballots are scanned in multiple batches within a precinct(s). When a batch is complete, it is accepted, and the next batch can be scanned. Multiple batches may make up a complete precinct Instructions provide that the ICC application on the tabulator is not closed until all ballots within that precinct have been scanned and accepted. If the operator inadvertently closes the ICC application on the tabulator, unlike the ICP, it can be reopened, and additional batches can be processed for that ICC AVCB tabulator.*

*In RTR, only validated and published results files can be printed and/or exported. Any batches in process in the ICC or adjudication applications would not be included in an export. Unlike the ICP, the ICCAVCB tabulator files do not need to be closed in RTR.*

*Dominion recommends that the City Lead confirm the accuracy and completion of ballot accounting documentation that all ballots for that AVCB have been processed. A thorough review and signoff of the printed summary report is recommended before exporting or uploading results. When all is complete, the ICCAVCB tabulator application can be closed, and file backups created.*

9. Has Dominion reviewed and advised the City of Detroit's administrative protocols to ensure all AVCB ballots have been tabulated and adjudicated before AVCBs are closed in the EMS.

*Dominion has not yet seen the City of Detroit's administrative protocols.*

*In addition to the DSuite documentation already provided, Dominion continues to reinforce best practices in the administration of the hardware and software system for accuracy and the successful completion of election night tally.*

10. What tests will be performed during the pre-election period to ensure the integrity and accuracy of data being generated while in the middle of adjudicating, through downloading and uploading process?

*The City of Detroit would need to provide a response with the full extent of tests to be performed.*

*Dominion recommended to the City that a full and complete mock end to end be run, inclusive of all systems in the tally and reporting process. Those processes and components include but are not limited to ballot preparation front end processes, precinct tabulators, VATS, AVCB tabulators, material management in the tally center, adjudication system, RTR, report review, uploads on the actual networks that will be used Election Day/Night, test results uploads to the City server at COBO and the Boulevard, upload to the County FSTP site and the City website/ENR vendor site. This full end to end for system components should be included in the L&A testing.*

*We recommended to the City that they contact their other election providers to request best practices and recommendations in conducting and participation in full tests.*

11. Can Dominion provide a complete process flow chart of how the mid-stream adjudication export throughout the night will be conducted, not just from an EMS file generation

## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

standpoint but also the global steps that have to be taken in order to get the file from Detroit to the County's FTPS server? ie. Adj. stations stop adjudicating...etc.  
*The complete process flow chart will be finalized by the City of Detroit Dominion continues to provide guidance, best practices and support for use and issue resolution as related to the system hardware and software.*  
Who will be the project lead on Dominion and City of Detroit side?  
*Dominion's Election Day support lead for the City of Detroit is Nick Ikonomakis, EVP of Engineering. The City of Detroit indicated that their Election Day project lead is Tim Gaffney.*  
What are the milestones for this project?  
*The City of Detroit would be best to respond regarding milestones for their project.*

**CHERYL HOLMES | SENIOR MANAGER**  
**CUSTOMER RELATIONS MANAGER - Florida / Louisiana / Michigan**  
**DOMINION VOTING SYSTEMS**  
120118<sup>th</sup> Street, Suite 210, Denver, CO 80202  
1.866.654.VOTE ext. 9324 | [DOMINIONVOTING.COM](http://DOMINIONVOTING.COM)  
[559.2893818](tel:5592893818) MOBILE

# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## Exhibit L: City of Detroit FOIA

In response to a December 2, 2022 FOIA request by the Michigan Grassroots Alliance for precinct-specific election results from the City of Detroit, the City provided the following sample response.

City of Detroit, AVCB 131				
Election Day	0	0	0	N/A
AV Counting Board	0	144	144	N/A
Total	0	144	144	N/A
City of Detroit, AVCB 132				
Election Day	0	0	0	N/A
AV Counting Board	0	118	118	N/A
Total	0	118	118	N/A
City of Detroit, AVCB 133				
Election Day	0	0	0	N/A
AV Counting Board	0	326	326	N/A
Total	0	326	326	N/A
City of Detroit, AVCB 134				
Election Day	0	0	0	N/A
AV Counting Board	0	356	356	N/A
Total	0	356	356	N/A

Note that the City of Detroit provided results that were AVCB-specific NOT precinct-specific as requested. There are typically 3-5 precincts per AVCB in Detroit. When pressed for precinct-specific vote tallies for absentee ballots, the City provided the following response:

From: Ivars Steins [REDACTED]  
Sent: Tuesday, April 25, 2023 12:42 PM  
To: Patrick Colbeck <[REDACTED]>  
Subject: RE: FOIA Request No. A22-25351  
Importance: High

Good afternoon,

Your request has been sent to the City of Detroit - Department of Elections. Department of elections has responded to the Law Department that because the information on their Image Cast Central Tabulators (ICCs) are precinct specific, the **particular precincts** for which information is requested needs to be included in the request. They have also advised that if the information is needed for all precincts, this task will take approximately six (6) months to complete. Please advise what precincts you are requesting information for pertaining to this request and I will pass along this information to them so that they may obtain the records. Thanks!

Privileged and Confidential

Ivars Steins Esq. (*he/him/his*)  
Assistant Corporation Counsel  
City of Detroit Law Department  
FOIA Section



According to the City of Detroit Department of Elections, it would take SIX MONTHS to determine the precinct-specific vote tallies by ICC tabulator. If this is how long it takes to determine the precinct-level results for absentee voters, how did Detroit submit their statement of votes to the Wayne County Board of Canvassers less than two weeks after the 2020 election (NOTE: Other communities provided these results within 24 hrs)? How were these votes tabulated? If there are truly paper printouts of the

## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

precinct-specific results for each tabulator as asserted by Detroit election officials, where are they? All election records are supposed to be retained for at least 22 months under USC Title 52 Section 20701. If that were the case, Detroit election officials should have been able to provide me with copies of such records. That wouldn't take six months.



# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## Exhibit M: Antrim County Modem Quotes

Government records clearly show Dominion Voting Systems providing quotes for modems to counties throughout Michigan including Antrim County.

ANTRIM COUNTY

PROPOSAL

ANTRIM  
Total Registered Voters: 19,916  
Date: April 17, 2017

DOMINION VOTING

**Base System Components - State Funded (Years 1-5)**

DESCRIPTION	QTY	UNIT PRICE	STATE FUNDED	NET PRICE	EXTENSION
<b>Precinct Hardware (Shared Cost, State-Local)</b>					
ICP Tabulator w/ Ballot Box	17	\$5,295	\$4,337.66	\$957.34	\$16,275
ICX-BMD-A Accessible Ballot Marking Device (Includes Touchscreen terminal and printer)	16	\$3,515	\$2,879.49	\$635.51	\$10,168
<b>Sub-Total:</b>					<b>\$26,443</b>
<b>Election Management System Software (Shared Cost, State-Local)</b>					
Accumulation Only EMS	1	\$18,563	\$15,206.81	\$3,356.19	\$3,356
<b>Sub-Total:</b>					<b>\$3,356</b>
<b>Total Initial Purchase Price</b>					<b>\$29,799</b>
<b>Discounts</b>					
Trade-in discount (Units must be brought to a central location for pickup)				included	
System Discount - Price Match					(\$29,799)
<b>Sub-Total:</b>					<b>(\$29,799)</b>
<b>Total Initial Purchase Price (Shared Cost, State-Local)</b>					<b>\$0</b>
<b>Base System Extended Service and Maintenance for Years 6-10</b>					
<b>Extended Service and Maintenance</b>					
ICP Tabulator w/ Ballot Box Annual Fee	17	\$375			\$6,375
ICX Accessible Ballot Marking Device Annual Fee	16	\$240			\$3,840
Accumulation Only EMS Annual Fee (Warranty Service and Preventative Maintenance to be completed at local jurisdictions)	1	\$2,500			\$2,500
<b>Sub-Total:</b>					<b>\$12,715</b>
<b>Years 6-10 Base System Annual Fees:</b>					<b>\$12,715</b>

ANTRIM COUNTY PG 2

**Optional Hardware and Software Components**

DESCRIPTION	QTY	UNIT PRICE	EXTENSION
<b>Precinct Hardware</b>			
ICP Tabulator w/ Ballot Box	1	\$5,390	\$5,390
ICP Tabulator (spare w/o ballot box)	0	\$4,395	\$0
Discount if purchased with this order	1	(\$57)	(\$57)
<b>Election Management System Hardware</b>			
EMS Express Server - Desktop	1	\$1,750	\$1,750
Compact Flash Reader/Writer	1	\$60	\$60
I-Button Programmer with USB Adapter	1	\$50	\$50
ICX Activation Card Programmer	1	\$26	\$26
<b>Sub-Total:</b>			<b>\$1,896</b>
<b>Results Transmission (Base - Wireless)</b>			
ImageCast Listener Express Server - Desktop	1	\$2,200	\$2,200
ImageCast Listener Express Firewall	1	\$480	\$480
EMS Express Managed Switch	1	\$200	\$200
ICP External Wireless Modem	17	\$295	\$5,015
ImageCast Communications Manager Software	1	\$10,800	\$10,800
<b>Sub-Total:</b>			<b>\$18,895</b>
<b>Results Transmission (Analog)</b>			
ImageCast Listener Express RAS System	1	\$2,165	\$2,165
ImageCast Listener USB Modems (Receiving)	5	\$225	\$1,125
<b>Sub-Total:</b>			<b>\$3,290</b>
<b>Results Transmission (VPN/SFTP)</b>			
Compact Flash Reader/Writer (per municipality)	1	\$60	\$60
<i>Note: Results Transfer Manager software is included for municipalities that wish to use VPN/FTP method for transmitting results from memory cards to the county.</i>			
<b>Optional Hardware and Software Components Annual Maintenance</b>			
<b>Extended Service and Maintenance</b>			
ImageCast Communications Manager Annual Fee	1	\$1,200	\$1,200

## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

### Exhibit N: Antrim County Connectivity Issue Email

Not only is there evidence that Dominion sold modems to Antrim County, the following email from Dominion employee Cheryl Holmes is evidence that these modems were used to support data transmissions in support of the elections.



## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

### Exhibit O: Antrim County Forensics Evidence

Examination of the Antrim County, MI EMS Server used to manage the 2020 election revealed evidence of internet-based communications with a server in Taiwan.

9) **Internet Communications with the Dominion ICX.** I examined the forensic image of a Dominion ICX system utilized in the November 2020 election and discovered evidence of internet communications to a number of public and private IP addresses. Of specific concern was the presence of the IP address 120.125.201.101 in the unallocated space of the 10<sup>th</sup> partition of the device. This IP address resolves back to the Ministry of Education Computer Center, 12F, No 106, Sec.2,Hoping E. Rd.,Taipei Taiwan 106. This IP address is contextually in close proximity to data that would indicate that it was part of the socket configuration and stream of an TCP/IP communication session. Located at physical sector 958273, cluster 106264, sector offset 256, file offset 54407424 of the storage drive, the unallocated nature of the artifact precludes the exact definition of the date and time that this data was created. Also located in close proximity to the Ministry of Education IP address is the IP address 62.146.7.79. This IP address resolves to a cloud provider in Germany.



## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

### Exhibit P: Halderman Report

Even the report generated by University of Michigan Professor J. Alex Halderman at the request of the defense in the Bailey v Antrim County lawsuit provided evident that the election outcomes were altered as a result of the configuration of the Dominion Voting System. Vote flips were not only possible using Dominion Voting Systems, they actually occurred in Antrim County, MI.

5. After polls closed, the county loaded results from the memory cards into its election management system for reporting. Three cards failed to load and were entered manually from the poll tapes. The other 15 cards appeared to load normally, but 13 had not been updated after the ballot design changes. Internally, the Dominion voting system uses a sequence of numbers to identify all available choices across all ballot designs. The scanners use these identifiers to record voter selections. The ballot design changes had the effect of altering the expected candidate identifiers in most of the county's precincts. When memory cards that used the old identifiers were interpreted by the election management system using the new identifiers, votes were assigned to the wrong candidates, causing large errors in the initial reported results for most contests in all but a few precincts. The election management system did not alert the operator about this problem while loading the results.

## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

Exhibit Q: Free Press

Even defense-friendly media reports acknowledged that the configuration of the Dominion Voting System was responsible for altering the outcome of the election in Antrim County, MI.

### **Antrim vote glitch: Expert shares how county mistakenly flipped from red to blue**



**Paul Egan**  
Detroit Free Press

Published 6:44 p.m. ET Nov. 6, 2020 | Updated 3:35 p.m. ET Nov. 7, 2020

LANSING — A failure to properly update software was the reason for a computer glitch that caused massive errors in unofficial election results reported from Antrim county, the Michigan Department of State said late Friday.

And a U-M professor of computer science and engineering who specializes in voting systems and securities says it appears the snafu arose from an "unusual sequence of events very unlikely to affect any other jurisdictions."

"The erroneous reporting of unofficial results from Antrim county was a result of accidental error on the part of the Antrim County clerk," the state agency that oversees elections said in a news release.

There was no problem with the voting machines or vote totals, which were preserved on tapes printed from the tabulators, the state said. The problem occurred when the totals by precinct were combined into candidate county-wide totals for transfer to the state, using election management system software, the state agency said.

# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## Exhibit R: ASOG Report

The Allied Security Operations Group (ASOG) issued a report on their analysis of the Antrim County, MI server that revealed that configuration logs indicated that Ranked Choice Voting was enabled on the Antrim EMS Server.

3. A high "error rate" in the election software (in this case 68.05%) reflects an algorithm used that will weight one candidate greater than another (for instance, weight a specific candidate at a 2/3 to approximately 1/3 ratio). In the logs we identified that the RCV or Ranked Choice Voting Algorithm was enabled (see image below from the Dominion manual). This allows the user to apply a weighted numerical value to candidates and change the overall result. The declaration of winners can be done on a basis of points, not votes. [Image 8]:

choice voting results are evaluated on a district per district basis and each district has a set number of points (100). Elimination and declaration of winners is done on basis of points, not votes.

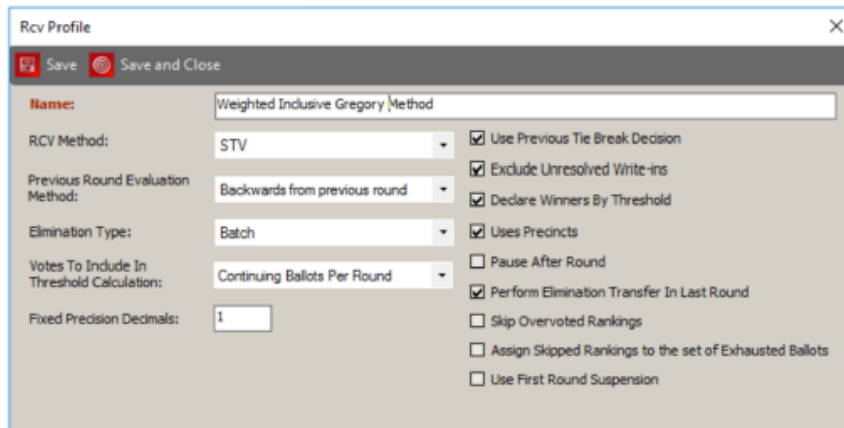


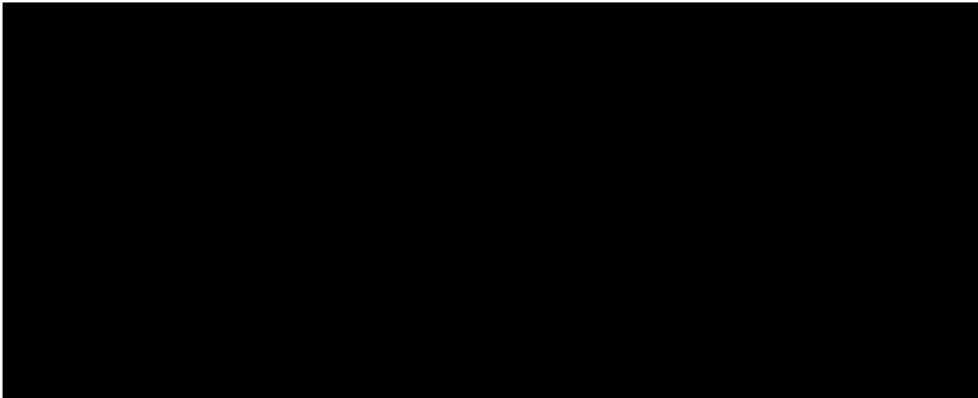
Figure 11-3: RCV Profile screen

The actual configuration logs were ordered to be redacted by Judge Elsenheimer under the false premise that configuration logs equate to "source code" and therefore were proprietary features not subject to disclosure. The report asserts that the unredacted log files would provide support for the assertion that Ranked Choice Voting was enabled in Antrim County, MI.

## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems



6. In the logs all but two of the Override Options were enabled on these machines, thus allowing any operator to change those votes. This gives the system operators carte blanche to adjudicate ballots, in this case 81.96% of the total cast ballots with no audit trail or oversight. [Image 10]:



7. On 12/8/2020 Microsoft issued 58 security patches across 10+ products, some of which were used for the election software machine, server and programs. Of the 58 security fixes 22, were patches to remote code execution (RCE) vulnerabilities. [Image 11]:

## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

### Exhibit S: FTPS Connections

The email from Dominion employee Cheryl Holmes on September 21, 2020 seems to indicate the intent of the City of Detroit to use FTPS connections to transfer election results to the County FTP Server. It is not clear, however, whether the FTPS reference in the email stands for FTP Server or FTP over TLS/SSL (aka FTPS). Regardless of whether or not they intend to use an unencrypted FTP connection, SFTP connection or an FTPS connection protocol, there is a clear intent to transfer election results via internet-based connection.

---

**From:** Cheryl Holmes <[cheryl.holmes@dominionvoting.com](mailto:cheryl.holmes@dominionvoting.com)>  
**Sent:** Monday, September 21, 2020 2:18 PM  
**To:** Tim Baumbach <[tim.baumbach@dominionvoting.com](mailto:tim.baumbach@dominionvoting.com)>; David Stahl <[david.stahl@dominionvoting.com](mailto:david.stahl@dominionvoting.com)>; Nicole Nollette <[nicole.nollette@dominionvoting.com](mailto:nicole.nollette@dominionvoting.com)>; Darren Silverburg <[darren.silverburg@dominionvoting.com](mailto:darren.silverburg@dominionvoting.com)>; Megan Hanna <[megan.hanna@dominionvoting.com](mailto:megan.hanna@dominionvoting.com)>  
**Subject:** INTERNAL - Response DRAFT to Wayne County Clerk email -

5. The City intends to upload an adjudication files to the County's **FTPS** every 15 minutes, the County will be following its previous protocols of loading hourly, does RTR prevent multiple adjudicated files from doubling the same batch results?  
The City intends to upload an adjudication files to the County's **FTPS** every 15 minutes, *The City would be best able to provide the frequency of the results file uploads to the **FTPS** that they intend to implement.*

the County will be following its previous protocols of loading hourly, does RTR prevent multiple adjudicated files from doubling the same batch results?  
*The same as in the County's EMS system, RTR prevents the upload files that have already been loaded. RTR will display an error message stating that these files already exist in the system and will not allow them to be uploaded or validated.*

# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## Exhibit T: SFTP Connections

Internal Dominion communications reveal that New York State requires that their Results Transfer Manager use SFTP protocol. Notably, their current RTM configuration used insecure FTP protocol.

Images from the NotCast Folder and Logfiles were uploaded to:

\\dvsp-file01\users\andrew.winter\Ticket Resource\ICC-2048 (BSR-3127) Yes California Charles Bocage, Tom Young 3 None 0 Minor Usability Impact Andrew Winter No 21 iOljef: Bugs, Support and Change Requests BSR-3129 Sullivan County, NY RTM - Needs to Support SFTP per New York State Support Open Minor Unresolved Martijn Punt Jim Alexander Jim Alexander 09/15/2020 20:58:00 09/16/2020 15:00:00 D-Suite 4.9 Results Transfer Manager 3 \_thumb\_76644.png Windows Server 2008 R2; Windows 7; Windows 10 Sullivan County NY reported that New York State has advised them that the RTM (Results Transfer Manager) must support SFTP. Currently the county is using RTM 4.9.17 which does not have a configuration selection for SFTP. It has **FTP**. No New York Gio Costantiello Requested functionality exists in 4.9 version of RTM, the "Secure Connection" checkbox should be checked to indicate that the server is an SFTP server. 3 1 Showstopper (Must Have) Jim Alexander and Martijn Punt No 21 iOljef: Medium EMS Pre-Voting PRE-3622 New Keyword needed to reference parent precinct name instead of precinct split name Story Open Minor Unresolved Ranko Stamatovic Alyssa Prohaska Alyssa Prohaska 09/15/2020 20:40:00 09/15/2020 20:40:00 5.13.4.2 1 \_thumb\_76640.png \_thumb\_76639.png \_thumb\_76638.png \_thumb\_76637.png \_thumb\_76636.png As an Election Administrator, I need a keyword that I can place within a ballot header or footer that references the name value for the top/parent precinct of a ballot rather than that ballot's Precinct split/Portion. The name of the top level precinct is more meaningful for both the election administrator, pollworkers and voters than the split name. A new keyword should be available from the existing keyword selections that, when used, references the Name value of the top-level or parent precinct. Colorado 3 No 5 Alyssa Prohaska (Resize) Ranko Stamatovic No 21 i01je7: ImageCast X ICD-3466 Progress messages during printing of ballots Story Open Minor Unresolved Nenad Matic Alyssa Prohaska Alyssa Prohaska 09/15/2020 18:27:00 09/15/2020 18:27:00 5.13.4.2 ICX 1 Voters need an informative progress message while their ballot is printing. When a voter selects to print their ballot, there should be a large clear message on screen indicating how many cards are printing (e.g. 1 of 1, 1 of 2, 1 of 7, etc...)

# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## Exhibit U: FTP Connections

Internal Dominion emails reveal that Dominion developers routinely used insecure FTP connections to transfer files used in their voting systems.

---

**From:** Ryan Almeida  
**Sent:** July 27, 2021 7:44 PM  
**To:** Lear\_Guo(\$P)£^ <[lear\\_guo@eversun.com.tw](mailto:lear_guo@eversun.com.tw)>  
**Cc:** Nebojsa Cirovic <[nebojsa.cirovic@dominionvoting.com](mailto:nebojsa.cirovic@dominionvoting.com)>; Taha Ramy <[taha.ramy@dominionvoting.com](mailto:taha.ramy@dominionvoting.com)>  
**Subject:** ICE Motherboard Repair - Error Message Follow Up

Hi Lear,

Regarding the ICE Motherboard error message troubleshooting we discussed in today's DRT, two things:

1. Did your team follow the procedure outlined in Taha's original email (attached)? In particular did your team follow Steps 4 and 5 of the repair procedure? ("Press Settings" and "Perform a "Restore MFG Settings" to clear the EEPROM"). If you don't recall, I have added images of what this process looks like in the PPT attached. (These screenshots are taken from pg16-19 of document 129-000547 which you already have in **FTP**). Please confirm if your team followed this procedure.
2. Could you also clarify the number count for units that experienced this issue? I believe you said 20 in the DRT? So does that mean 20 MBs experienced this issue and all others did not? Or did you say there were 20 boards that had yet to undergo SW upgrade after board was repaired? Or both? Would appreciate your clarification.

We can discuss any questions in our call tonight. Thanks,

RYAN ALMEIDA | HARDWARE ENGINEER

DOMINION VOTING SYSTEMS  
1. 866.654.8683 | [DOMINIONVOTING.COM](http://DOMINIONVOTING.COM)



## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

---

**From:** hk.wei(J@0E^> <[hk.wei@eversun.com.tw](mailto:hk.wei@eversun.com.tw)>  
**Sent:** Monday, November 29, 2021 3:12 AM  
**To:** Ryan Almeida; Nebojsa Cirovic; Joseph Lucchese  
**Cc:** Lear\_Guo(M@^); [vincenth@avalue-usa.com](mailto:vincenth@avalue-usa.com); Arnold Atienza; Aamer Chaudhry; Taha Ramy; Dejan Marinkovic; Shadow (PlzEJJ); Wu (吳朋靛); Brian\_Hsu(^n#); Peter\_Tang(唐志海)  
**Subject:** RE: [EXTERNAL] RE: New ICE Motherboard Boot Flash Preprogrammed Part (DVS p/n:124-000048)

Hi Ryan,

Thank you. The file has been downloaded from **FTP**.  
We will arrange the test and reply to the console log as soon as possible.

Best Regards.

\*\*\*\*\*  
昶亨科技股份有限公司  
Eversun Electronic CO., LTD  
HK.Weii 魏皓焜  
Engineering Dept.  
Tel: 886-7-8152243 #104  
高雄市前鎮區東十街6號  
\*\*\*\*\*

## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

### Exhibit V: Lake v Fontes Decryption Keys

Exhibits presented in Lake v Fontes petition to the Supreme Court of the United States reveals that Dominion stores their decryption keys in plain text in the database for their EMS servers. So even if they used encrypted protocols for data transfers over the internet, the keys needed to decrypt these data transfers was easily accessible.



The screenshot shows an SQL query window with the following text:

```
SQLQuery1.sql
/***** Script for SelectTopNRows command from SSRS *****/
SELECT [elec
, [RijndaelKey
FROM [2020]
ent]
```

Below the query, the results are displayed in a table with the following columns: electionDate, jurisdiction, description, RijndaelKey, RijndaelVector, X509Data, and HMACKey. The first row of data is highlighted in blue.

electionDate	jurisdiction	description	RijndaelKey	RijndaelVector	X509Data	HMACKey
2020-11-03	Maricopa County	General Election 2020	c12j7Y1L	7a9K44	0x308205E10	0x45506

Figure 7 - Rijndael Key for Maricopa 2020 Election

- 25) Simply put, this is like a bank having the most secure vault in the world, touting how secure it is to the public and then taping the combination in large font type on the wall next to the vault door.

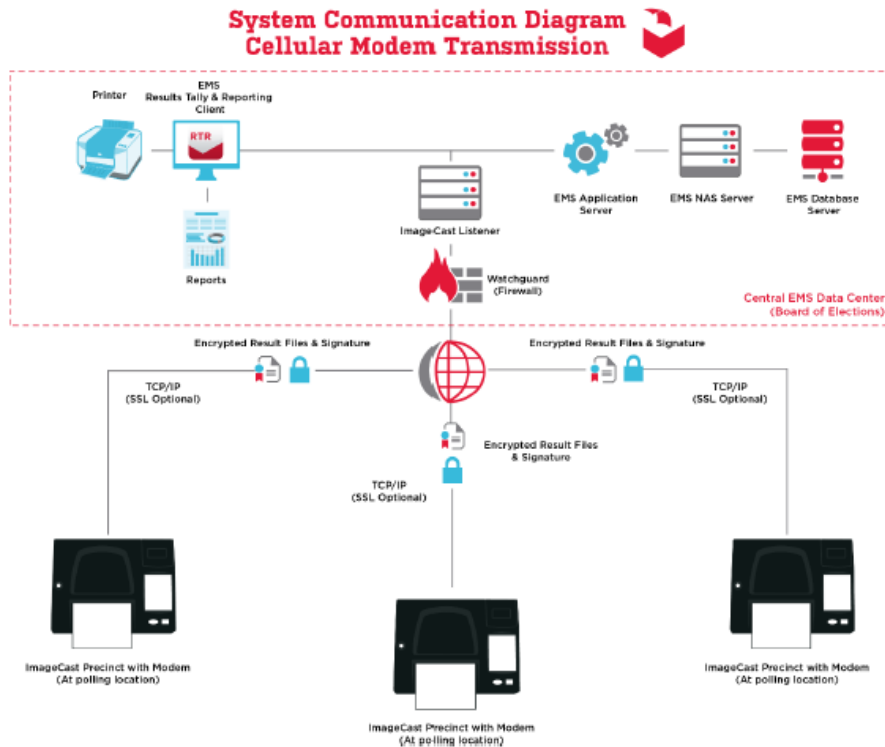
# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## Exhibit W: Listening Modules

Dominion used ImageCast Listener (ICL) software modules to collect election results over the internet from precinct-based vote tabulators.

CONTRACT #071B7700117 

### ImageCast Listener



The ImageCast Listener module is responsible for receiving and tracking encrypted results file transmissions from any ImageCast Election Day tabulator.

Unlike traditional results transmission using FTP/SFTP, the ImageCast Listener uses a secure and proprietary protocol for establishing an authenticated connection with the ImageCast tabulators. The ImageCast Listener verifies the signature of the results file upon receipt and immediately informs election officials whether the file is valid or if any suspicious activity is detected. Results files are encrypted using AES-128 or AES-256. They are signed with SHA-256.

## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

### Exhibit X: Gableman Report

In Wisconsin, the report on the 2020 election prepared for the Wisconsin legislature by former Justice Mike Gableman revealed that “contrary to what Dominion has publicly stated, that at least some machines had access to the internet on election night”.

The Special Counsel reviewed extensive reporting of a Dominion machine failure event in another State. The OSC was able to identify, through the reports of experts, that the failed machine recorded two anonymous and unauthorized access events from its VPN. This means, contrary to what Dominion has publicly stated, that at least some machines had access to the internet on election night. Shortly after the unauthorized access was recorded, the machine failed and was reset, wiping all voting history and forcing that election administrator to rely on unverifiable paper printouts from the failed machine.

# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

## Exhibit Y: Dominion Foreign Employees

Internal Dominion emails reveal that Dominion had a large contingent of software developers for their voting systems based in Belgrade, Serbia.

---

**From:** Nenad Matic <[nenad.matic@dominionvoting.com](mailto:nenad.matic@dominionvoting.com)>  
**Sent:** Wednesday, April 22, 2020 11:06 AM  
**To:** Goran Obradovic <[goran.obradovic@dominionvoting.com](mailto:goran.obradovic@dominionvoting.com)>; Ranko Stamatovic <[ranko.stamatovic@dominionvoting.com](mailto:ranko.stamatovic@dominionvoting.com)>; Maja Bajovic <[maja.bajovic@dominionvoting.com](mailto:maja.bajovic@dominionvoting.com)>; Rade Djermanovic <[rade.djermanovic@dominionvoting.com](mailto:rade.djermanovic@dominionvoting.com)>  
**Cc:** Djordje Matijevic <[djordje.matijevic@dominionvoting.com](mailto:djordje.matijevic@dominionvoting.com)>; Sanja Sobotovic <[sanja.sobotovic@dominionvoting.com](mailto:sanja.sobotovic@dominionvoting.com)>  
**Subject:** RE: CO - testiranje

Pokusavamo da nadjem projekte za CO kako bi shvatili koliko ballota imaju I kako bi mogli da kreiramo iste samo sa PNG-iovim za Full Ballot.  
Ja sam skinuo neki Mock project 2017 za Denver koji sam nasao.  
Sad skidam 2016 General za Denver, sto ce potrajati malo.

Onda cemo ubaciti 22" ballote, umesto QR png pa cemo videte koliki su el fajlovi i dal mozemo da ih ucitamo na Samsung / Classic / Prime.  
Sto se tice verzije mi smo radili sve u trunk, al cemo sad da vidimo da backportujemo feature u 5.11 koji je koriscen u CO proslе godine.

NENAD MATIC ( PRODUCT OWNER, ICX  
DOMINION VOTING SYSTEMS, CORP.  
Osmana Djikica 18. 11000 BELGRADE  
381-11-404-3090 | [DOMINIONVOTING.COM](http://DOMINIONVOTING.COM)  
381-11-404-3090 OFFICE (EXT 441)  
Mobile: +381 69 720958 (EXT 541)

---

**From:** Goran Obradovic <[goran.obradovic@dominionvoting.com](mailto:goran.obradovic@dominionvoting.com)>  
**Sent:** Tuesday, April 21, 2020 4:17 PM  
**To:** Ranko Stamatovic <[ranko.stamatovic@dominionvoting.com](mailto:ranko.stamatovic@dominionvoting.com)>; Nenad Matic <[nenad.matic@dominionvoting.com](mailto:nenad.matic@dominionvoting.com)>; Maja Bajovic <[maja.bajovic@dominionvoting.com](mailto:maja.bajovic@dominionvoting.com)>; Rade Djermanovic <[rade.djermanovic@dominionvoting.com](mailto:rade.djermanovic@dominionvoting.com)>  
**Cc:** Djordje Matijevic <[djordje.matijevic@dominionvoting.com](mailto:djordje.matijevic@dominionvoting.com)>; Sanja Sobotovic <[sanja.sobotovic@dominionvoting.com](mailto:sanja.sobotovic@dominionvoting.com)>  
**Subject:** Re: CO - testiranje

We're trying to find projects for CO so they can figure out how many ballots they have and how they can We only create the same with PNG's for Full Ballot. I downloaded some Mock project 2017 for Denver that I found.  
Now I'm downloading the 2016 General for Denver, which is going to take a while.  
Then we'll insert 22" ballotes instead of QR png and we'll see how big the el files are and if we can make them Download on Samsung/ Classic/ Prime.  
As for the version we did everything in trunk, but now we will see that we are backporting the feature in 5.11

---

**From:** Goran Obradovic [[goran.obradovic@dominionvoting.com](mailto:goran.obradovic@dominionvoting.com)]  
**Sent:** 1/6/2021 9:22:55 PM  
**To:** Ivan Vukovic [[ivan.vukovic@dominionvoting.com](mailto:ivan.vukovic@dominionvoting.com)]  
**CC:** David Moreno [[david.moreno@dominionvoting.com](mailto:david.moreno@dominionvoting.com)]  
**Subject:** Re: [ JIRA ] Luzerne County ICC STOP button / results by precinct

You mean in Belgrade? I don't think so. Maybe Martijn can take a look but I think he is on vacation.  
G

GORAN OBRADOVIC | VP ENGINEERING AND GM EUROPE  
DOMINION VOTING  
215 Spadina Avenue, Toronto, Ontario, M5T 2C7  
1.866.654.8683 | [DOMINIONVOTING.COM](http://DOMINIONVOTING.COM)  
866.654.8683 OFFICE (ext 401)

---

**From:** Ivan Vukovic <[ivan.vukovic@dominionvoting.com](mailto:ivan.vukovic@dominionvoting.com)>  
**Sent:** Wednesday, January 6, 2021 10:00:51 PM  
**To:** Goran Obradovic <[goran.obradovic@dominionvoting.com](mailto:goran.obradovic@dominionvoting.com)>  
**Cc:** David Moreno <[david.moreno@dominionvoting.com](mailto:david.moreno@dominionvoting.com)>  
**Subject:** Fwd: [ JIRA ] Luzerne County ICC STOP button / results by precinct

Hey Goran,

Is anyone from EMS working on Friday? David logged this as an urgent request to assist our customer in PA.

## Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

### Exhibit Z: Serbian Background Check Restrictions

The assertion by the Dominion CEO that “extensive background checks” were performed is exposed as a lie in the following internal Dominion communications. It is against Serbian law to perform “extensive background checks” on employees.

---

**To:** Daniel Mallatt[daniel.mallatt@dominionvoting.com]; Mike Frontera[mike.frontera@dominionvoting.com]  
**Cc:** Marija Kovacevic[marija.kovacevic@dominionvoting.com]  
**From:** Mirjana Elez  
**Sent:** Tue 4/21/2020 8:55:22 AM  
**Subject:** RE: [EXTERNAL] FW: Opinion required - Serbia background checks

Hi Guys,

I'd have a better word than enjoying, but that's no way to start a working week \*

Anyway, let me try to make some summary of what we know about this topic. It's gonna be more than 3 bullets, but I tried to make it clear and step by step:

- Conclusion of the overall situation is that there is way to ASK for personal information (criminal records, police, courts), but there is no GUARANTEE that we will get them at the end.
- Two main terms to consider are “data collector” and “data processor”. In this case, “data collector” is DVS i.e. the owner of Serbian entity. We are a branch office of US company, so the only “entity” that can ask for data is the actual US DVS company, through DVS Serbia as its branch.
- DVS Serbia **CAN NOT** ask any individual (candidate, future or current employee) to provide this data, that is entirely illegal.

# Perjury Complaint: John Poulos, CEO of Dominion Voting Systems

---

**From:** Alexis Sylvester <Alexiss.Sylvester@sterlingcheck.com>  
**Sent:** Wednesday, August 5, 2020 8:31 AM  
**To:** Marshall Mathews <marshall.mathews@sterlingcheck.com>; Daniel Mallatt <daniel.mallatt@dominionvoting.com>; Isaac King <Isaac.King@sterlingcheck.com>  
**Cc:** Justin Brant <Justin.Brant@sterlingcheck.com>; Adam Harris <adam.harris@dominionvoting.com>  
**Subject:** RE: [EXTERNAL] Weekly Touchbase - Dominion Voting  
**Sensitivity:** Private

Hi Daniel,

I hope you are well!

I wish I was coming to you with a positive update, but unfortunately we do not have a resolution on the below items you mentioned.

- Serbian e-invite data collection – can only legally ask for full name & email address.
- Serbian Global Consent – any way to make this an e-form/signature?
- Any way to request personal email from everyone (US, Canada, Serbia) to help with Social Media screening since the system will already have their work email and those likely aren't connected to social media accounts.

We will continue to press our team to see if we can come to a resolution on the above, but in the meantime I wanted to follow up as I know you'd like to push through your rescreens. We'd be happy to get the US and Canada rescreens started. I know that means communicating internally that the Serbia screening won't be going out at this time. From our previous conversation I know you also wanted to send out internal communication to the team so they are aware that this rescreen is about to happen. Once you've done that please feel free to provide us your list for Canada and the US and we will work on pushing these through.

Marshall is currently experiencing internet issues, but if you have any questions please reach out.

Thank you!

**Alexiss Sylvester**

SALES EXECUTIVE

**Sterling**

o: 216.685.7121 | m: 216.215.8673

alexiss.sylvester@sterlingcheck.com

sterlingcheck.com