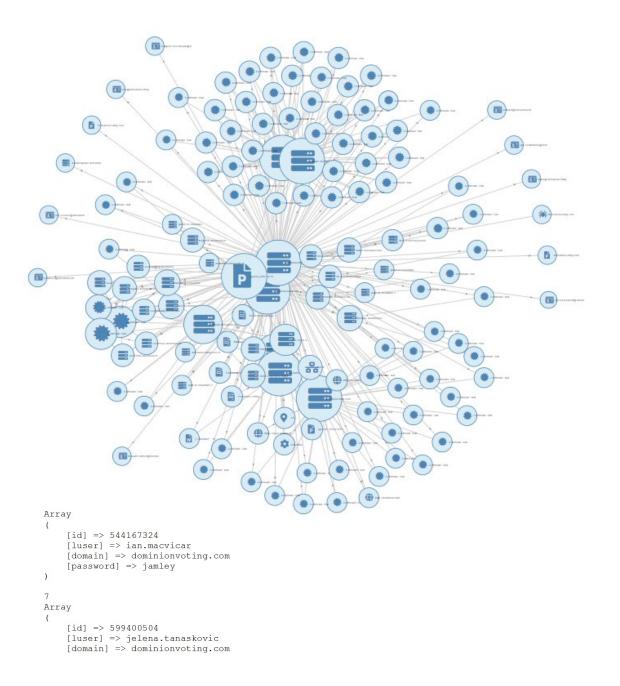
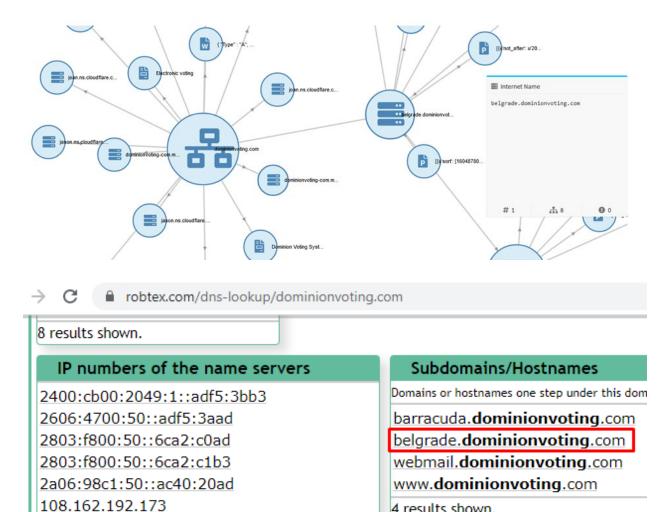
#### Declaration of

Pursuant to 28 U.S.C Section 1746, make the following declaration.

- 1. I am over the age of 21 years and I am under no legal disability, which would prevent me from giving this declaration.
- 2. I was an electronic intelligence analyst under 305<sup>th</sup> Military Intelligence with experience gathering SAM missile system electronic intelligence. I have extensive experience as a white hat hacker used by some of the top election specialists in the world. The methodologies I have employed represent industry standard cyber operation toolkits for digital forensics and OSINT, which are commonly used to certify connections between servers, network nodes and other digital properties and probe to network system vulnerabilities.
- 3. I am a US citizen and I reside location in the United States of America.
- 4. Whereas the Dominion and Edison Research systems exist in the internet of things, and whereas this makes the network connections between the Dominion, Edison Research and related network nodes available for scanning,
- 5. And whereas Edison Research's primary job is to report the tabulation of the count of the ballot information as received from the tabulation software, to provide to Decision HQ for election results,
- 6. And whereas Spiderfoot and Robtex are industry standard digital forensic tools for evaluation network security and infrastructure, these tools were used to conduct public security scans of the aforementioned Dominion and Edison Research systems,
- 7. A public network scan of Dominionvoting.com on 2020-11-08 revealed the following interrelationships and revealed 13 unencrypted passwords for dominion employees, and 75 hashed passwords available in TOR nodes:



8. The same public scan also showed a direct connection to the group in Belgrade as highlighted below:



9. A cursory search on LinkedIn of "dominion voting" on 11/19/2020 confirms the numerous employees in Serbia:

4 results shown.



108 162 103 170

#### Vukašin Đorđević • 3rd

Software Developer at Dominion Voting Systems Serbia

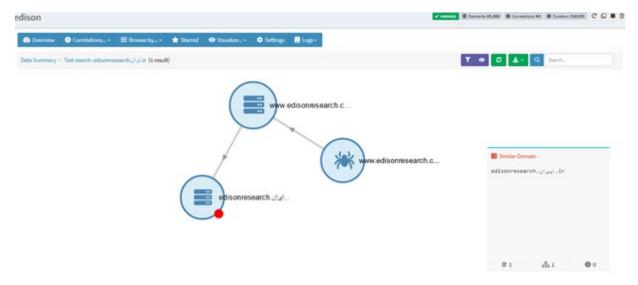


#### Edvan Sabanovic • 3rd

Senior Full-stack Web Developer Belgrade, Serbia

Past: Senior Web Developer at Dominion Voting Systems

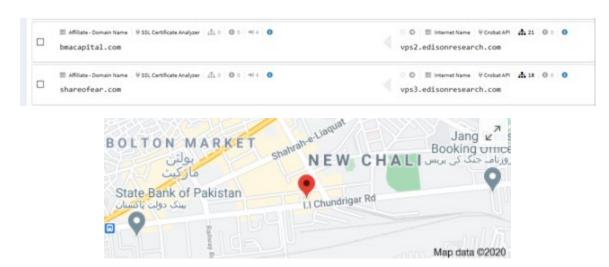
10. An additional search of Edison Research on 2020-11-08 showed that Edison Research has an Iranian server seen here:



Inputting the Iranian IP into Robtex confirms the direct connection into the "edisonresearch" host from the perspective of the Iranian domain also. This means that it is not possible that the connection was a unidirectional reference.



A deeper search of the ownership of Edison Research "edisonresearch.com" shows a connection to BMA Capital Management, where shareofear.com and bmacapital.com are both connected to edisonresearch.com via a VPS or Virtual Private Server, as denoted by the "vps" at the start of the internet name:



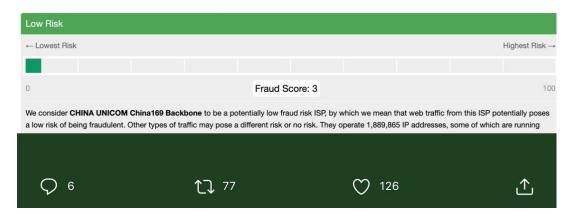
Dominionvoting is also dominionvotingsystems.com, of which there are also many more examples, including access of the network from China. The records of China accessing the server are reliable.







#### CHINA UNICOM China169 Backbone - Fraud Risk



#### Domain Name: dominionvotingsystems.com

Registry Domain ID: 2530599738\_DOMAIN\_COM-VRSN

Registrar WHOIS Server: whois.godaddy.com Registrar URL: http://www.godaddy.com Updated Date: 2020-05-26T15:48:58Z Creation Date: 2020-05-26T15:48:57Z

Registrar Registration Expiration Date: 2021-05-26T15:48:57Z

Registrar: GoDaddy.com, LLC Registrar IANA ID: 146

Registrar Abuse Contact Email: abuse@godaddy.com Registrar Abuse Contact Phone: +1.4806242505

Domain Status: clientTransferProhibited http://www.icann.org/epp#clientTransferProhibited Domain Status: clientUpdateProhibited http://www.icann.org/epp#clientUpdateProhibited Domain Status: clientRenewProhibited http://www.icann.org/epp#clientRenewProhibited Domain Status: clientDeleteProhibited http://www.icann.org/epp#clientDeleteProhibited

Registrant Organization:

Registrant State/Province: Hunan

Registrant Country: CN

Registrant Email: Select Contact Domain Holder link at

https://www.godaddy.com/whois/results.aspx?domain=dominionvotingsystems.com

Admin Email: Select Contact Domain Holder link at

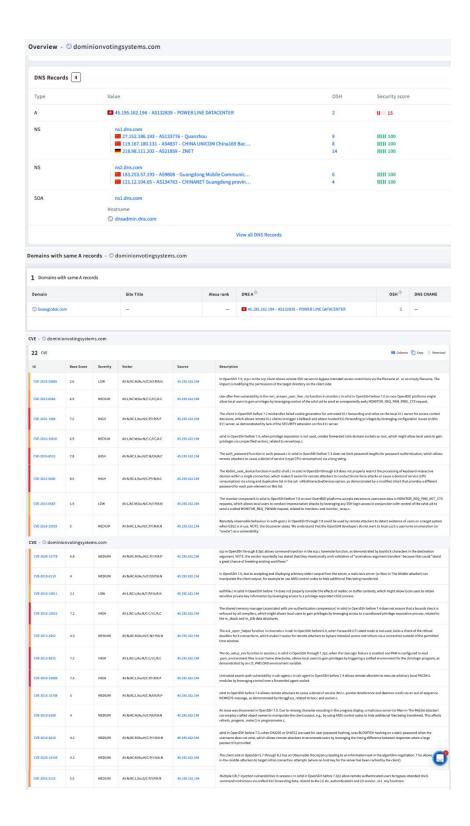
https://www.godaddy.com/whois/results.aspx?domain=dominionvotingsystems.com

Tech Email: Select Contact Domain Holder link at

 $https:/\!/\!www.godaddy.com/who is/results.aspx?domain=dominion voting systems.com$ 

Name Server: NS1.DNS.COM Name Server: NS2.DNS.COM

DNSSEC: unsigned



11. BMA Capital Management is known as a company that provides Iran access to capital markets with direct links publicly discoverable on LinkedIn (found via google on 11/19/2020):

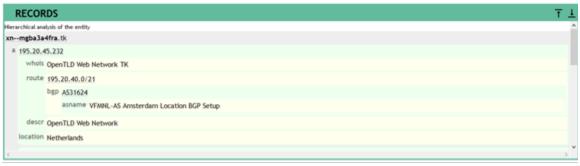
www.linkedin.com > muhammad-talha-a0759660

### Muhammad Talha - BMA Capital Management Limited

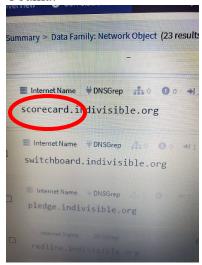
Manager, Money Market & Fixed Income at **BMA Capital** Management Limited. **BMA Capital** ... Manager-FMR at Pak Iran Joint Investment Company. Pakistan.

Pakistan · Manager, Money Market & Fixed Income · BMA Capital Management Limited

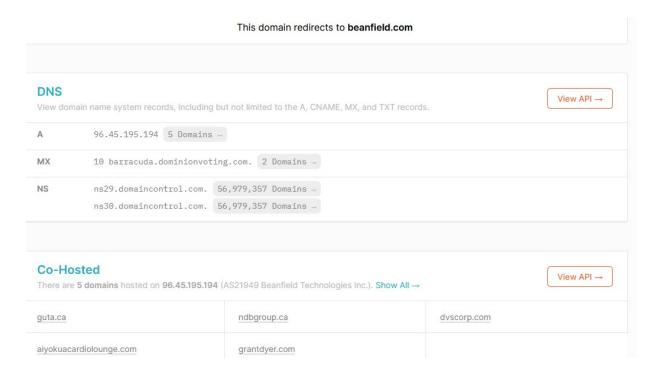
The same Robtex search confirms the Iranian address is tied to the server in the Netherlands, which correlates to known OSINT of Iranian use of the Netherlands as a remote server (See Advanced Persistent Threats: APT33 and APT34):



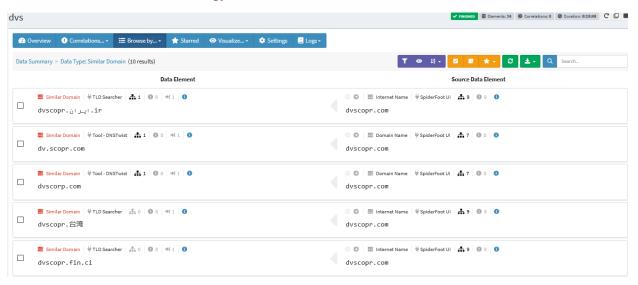
12. A search of the indivisible.org network showed a subdomain which evidences the existence of scorecard software in use as part of the Indivisible (formerly ACORN) political group for Obama:

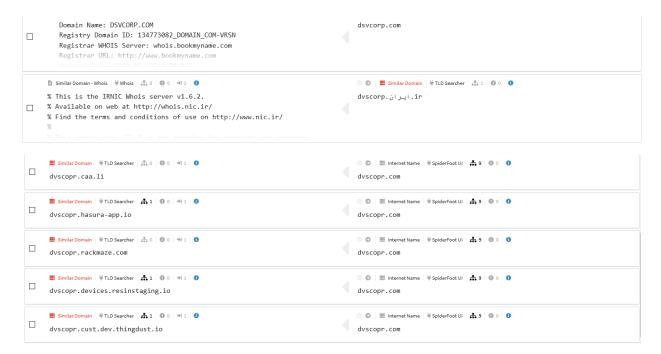


- 13. Each of the tabulation software companies have their own central reporting "affiliate". Edison Research is the affiliate for Dominion.
- 14. Beanfield.com out of Canada shows the connections via co-hosting related sites, including dvscorp.com:



This Dominion partner domain "dvscorp" also includes an auto discovery feature, where new innetwork devices automatically connect to the system. The following diagram shows some of the related dvscopr.com mappings, which mimic the infrastructure for Dominion and are an obvious typo derivation of the name. Typo derivations are commonly purchased to catch redirect traffic and sometimes are used as honeypots. The diagram shows that infrastructure spans multiple different servers as a methodology.





The above diagram shows how these domains also show the connection to Iran and other places, including the following Chinese domain, highlighted below:



- 15. The auto discovery feature allows programmers to access any system while it is connected to the internet once it's a part of the constellation of devices (see original Spiderfoot graph).
- 16. Dominion Voting Systems Corporation in 2019 sold a number of their patents to China (via HSBC Bank in Canada):

# Assignment details for assignee "HSBC BANK CANADA, AS COLLATERAL AGENT"

## Assignments (1 total)

Assignment 1

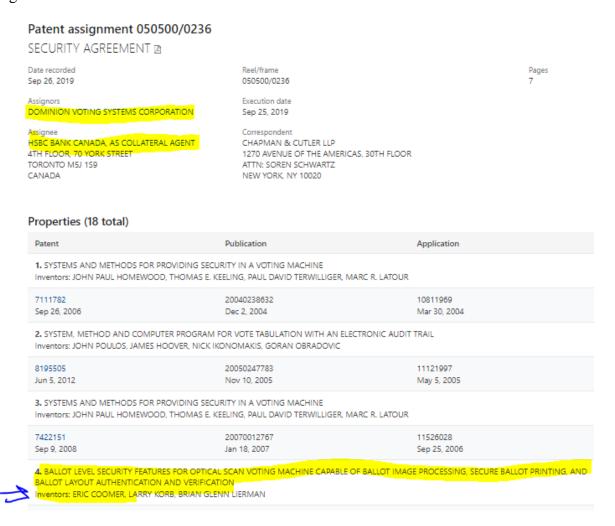
Reel/frame 050500/0236	Execution date Sep 25, 2019	Date recorded Sep 26, 2019	Pages 7
	eyance AGREEMENT		
Assignors  DOMINION VOTING SYSTEMS CORPORATION	Correspondent  CHAPMAN & CUTLER LLP  1270 AVENUE OF THE  AMERICAS, 30TH FLOOR  ATTN: SOREN SCHWARTZ  NEW YORK, NY 10020		Attorney docket
Assignee  HSBC BANK CANADA, AS COLLATERAL AGENT  4TH FLOOR, 70 YORK STREET  TORONTO M5J 1S9  CANADA			

Patent	Publication	Application	PCT	International registration
8844813	20130306724	13476836		
8913787	20130301873	13470091		
9202113	20150071501	14539684		
8195505	20050247783	11121997		
9870666	20120232963	13463536		
9710988	20120259680	13525187		
9870667	20120259681	13525208		
7111782	20040238632	10811969		
7422151	20070012767	11526028		
D599131		29324281		

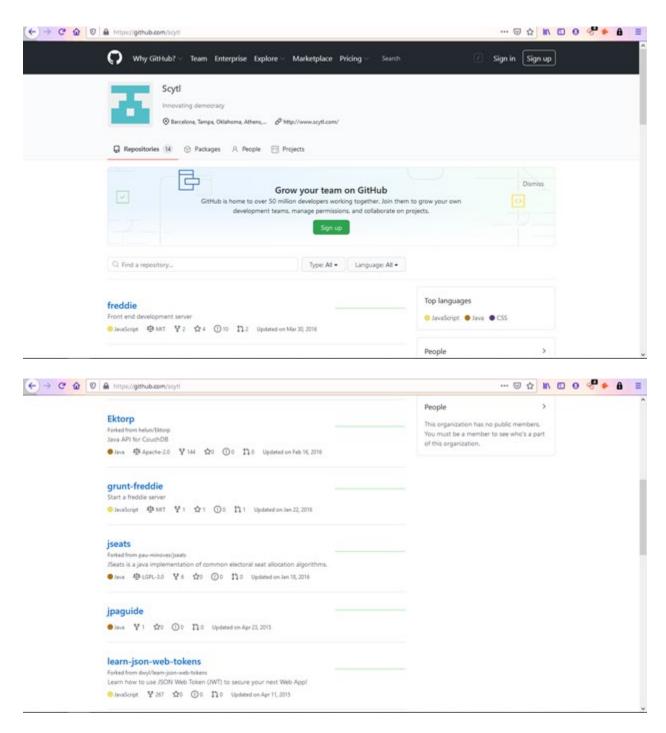
This searchable database contains all recorded Patent Assignment information from August 1980 to the present.

When the USPTO receives relevant information for its assignment database, the USPTO puts the information in the public record and does not verify the validity of the information. Recordation is a ministerial function—the USPTO neither makes a determination of the legality of the transaction nor the right of the submitting party to take the action.

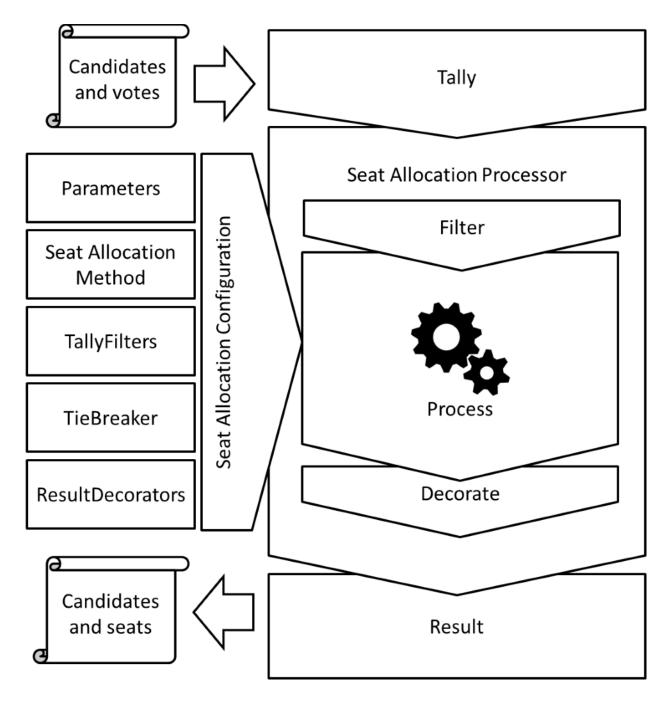
Release 2.0.0 | Release Notes | Send Feedback | Legacy Patent Assignment Search | Legacy Trademark Assignment Search Of particular interest is a section of the document showing aspects of the nature of the patents dealing with authentication:



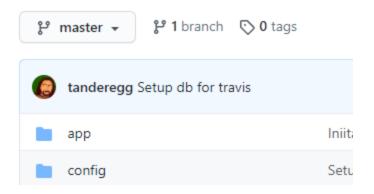
17. Smartmatic creates the backbone (like the cloud). SCYTL is responsible for the security within the election system.



18. In the GitHub account for Scytl, Scytl Jseats has some of the programming necessary to support a much broader set of election types, including a decorator process where the data is smoothed, see the following diagram provided in their source code:



19. Unrelated, but also a point of interest is CTCL or Center for Tech and Civic Life funded by Mark Zuckerberg. Within their github page (<a href="https://github.com/ctcl">https://github.com/ctcl</a>), one of the programmers holds a government position. The Bipcoop repo shows tanderegg as one of the developers, and he works at the Consumer Financial Protection Bureau:



# Tim Anderegg

tanderegg

Follow	
മു 38 followers ∙ 23 following ∙ 🏠 ്	133
Consumer Financial Protection Washington DC	Bureau

20. As seen in included document titled

"AA20-304A-

Iranian\_Advanced\_Persistent\_Threat\_Actor\_Identified\_Obtaining\_Voter\_Registration\_Data "that was authored by the Cybersecurity & Infrastructure Security Agency (CISA) with a Product ID of AA20-304A on a specified date of October 30, 2020, CISA and the FBI reports that Iranian APT teams were seen using ACUTENIX, a website scanning software, to find vulnerabilities within Election company websites, confirmed to be used by the Iranian APT teams buy seized cloud storage that I had personally captured and reported to higher authorities. These scanning behaviors showed that foreign agents of aggressor nations had access to US voter lists, and had done so recently.

21. In my professional opinion, this affidavit presents unambiguous evidence that Dominion Voter Systems and Edison Research have been accessible and were certainly compromised by rogue actors, such as Iran and China. By using servers and employees connected with rogue actors and hostile foreign influences combined with numerous easily discoverable leaked credentials, these organizations neglectfully allowed foreign adversaries to access data

and intentionally provided access to their infrastructure in order to monitor and manipulate elections, including the most recent one in 2020. This represents a complete failure of their duty to provide basic cyber security. This is not a technological issue, but rather a governance and basic security issue: if it is not corrected, future elections in the United States and beyond will not be secure and citizens will not have confidence in the results.

I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge. Executed this November 23<sup>th</sup>, 2020.

