

EXHIBIT 2

An Analysis of Surveys Regarding Absentee Ballots Across Several States

William M. Briggs

November 23, 2020

1 Summary

Survey data was collected from individuals in several states, sampling those who the states listed as not returning absentee ballots. The data was provided by Matt Braynard.

The survey asked respondents whether they (a) had ever requested an absentee ballot, and, if so, (b) whether they had in fact returned this ballot. From this sample I produce predictions of the total numbers of: **Error #1**, those who were recorded as receiving absentee ballots *without* requesting them; and **Error #2**, those who returned absentee ballots but whose votes went missing (i.e. marked as unreturned).

The sizes of both errors were large in each state. The states were Georgia, Michigan, Wisconsin, and Arizona where ballots were across parties. Pennsylvania data was for Republicans only.

2 Analysis Description

Each analysis was carried out separately for each state. The analysis used (a) the number of absentee ballots recorded as unreturned, (b) the total responding to the survey, (c) the total of those saying they did not request a ballot, (d) the total of those saying they did request a ballot, and of these (e) the number saying they returned their ballots. I assume survey respondents are representative and the data is accurate.

From these data a simple parameter-free predictive model was used to calculate the probability of all possible outcomes. Pictures of these probabilities were derived, and the 95% prediction interval of the relevant numbers was calculated. The pictures appear in the Appendix at the end. They are summarized here with their 95% prediction intervals.

Error #1: being recorded as sent an absentee ballot without requesting one.

Error #2: sending back an absentee ballot and having it recorded as not returned.

State	Unreturned ballots	Error #1	Error #2
Georgia	138,029	16,938–22,771	31,559–38,866
Michigan	139,190	29,611–36,529	27,928–34,710
Pennsylvania*	165,412	32,414–37,444	26,954–31,643
Wisconsin	96,771	16,316–19,273	13,991–16,757
Arizona	518,560	208,333–229,937	78,714–94,975

*Number for Pennsylvania represent Republican ballots only.

Ballots that were not requested, and ballots returned and marked as not returned were classed as *troublesome*. The estimated average number of troublesome ballots for each state were then calculated using the table above and are presented next.

State	Unreturned ballots	Estimated average troublesome ballots	Percent
Georgia	138,029	53,489	39%
Michigan	139,190	62,517	45%
Pennsylvania*	165,412	61,780	37%
Wisconsin	96,771	29,594	31%
Arizona	518,560	303,305	58%

*Number for Pennsylvania represent Republican ballots only.

3 Conclusion

There are clearly a large number of troublesome ballots in each state investigated. Ballots marked as not returned that were never requested are clearly an error of some kind. The error is not small as a percent of the total recorded unreturned ballots.

Ballots sent back and unrecorded is a separate error. These represent votes that have gone missing, a serious mistake. The number of these missing ballots is also large in each state.

Survey respondents were not asked if they received an unrequested ballot whether they sent these ballots back. This is clearly a lively possibility, and represents a third possible source of error, including the potential of voting twice (once by absentee and once at the polls). No estimates or likelihood can be calculated for this potential error due to absence of data.

4 Declaration of William M. Briggs, PhD

1. My name is William M. Briggs. I am over 18 years of age and am competent to testify in this action. All of the facts stated herein are true and based on my personal knowledge.
2. I received a Ph.D of Statistics from Cornell University in 2004.
3. I am currently a statistical consultant. I make this declaration in my personal capacity.
4. I have analyzed data regarding responses to questions relating to mail ballot requests, returns and related issues.
5. I attest to a reasonable degree of professional certainty that the resulting analysis are accurate.

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



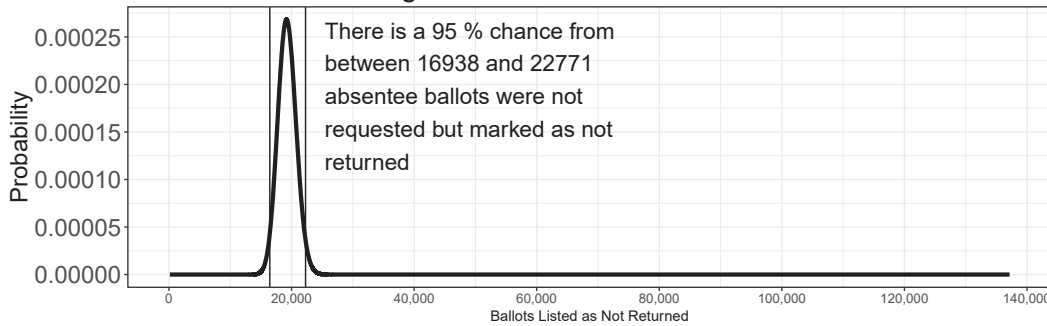
23 November 2020

William M. Briggs

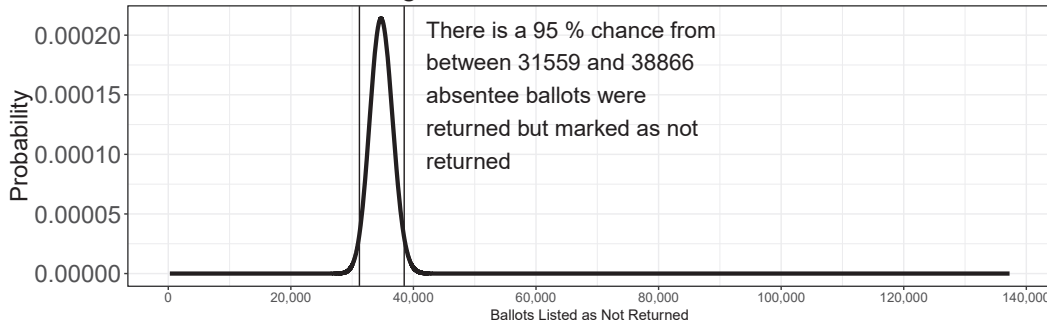
5 Appendix

The probability pictures for each state for each outcome as mentioned above.

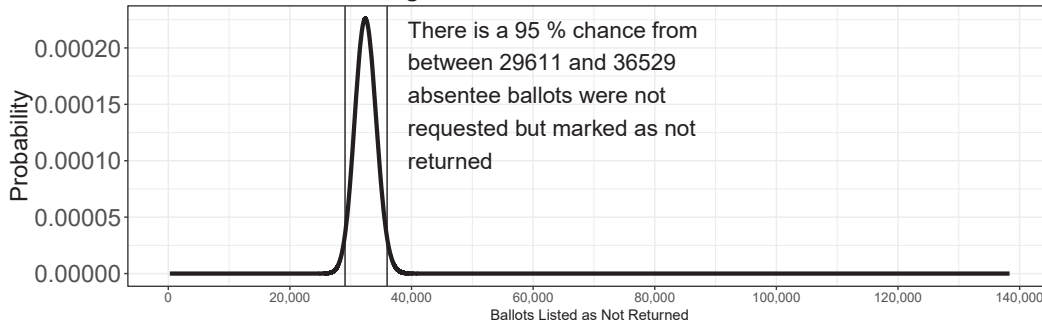
Probability of numbers of un-requested absentee ballots listed as not returned for Georgia



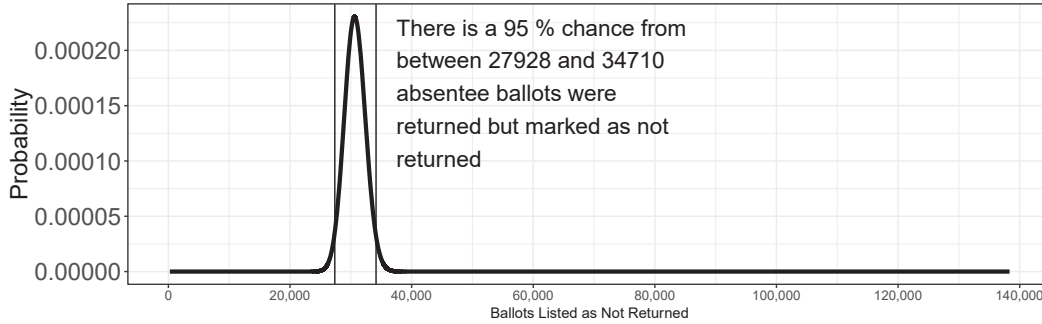
Probability of numbers of absentee ballots returned but listed as not returned for Georgia



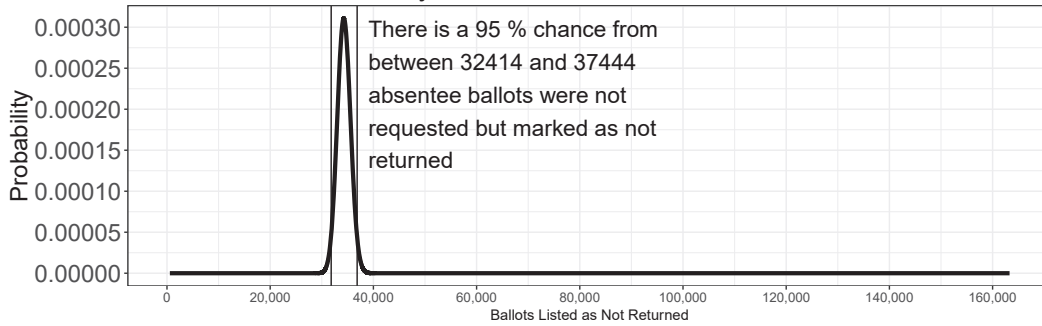
Probability of numbers of un-requested absentee ballots listed as not returned for Michigan



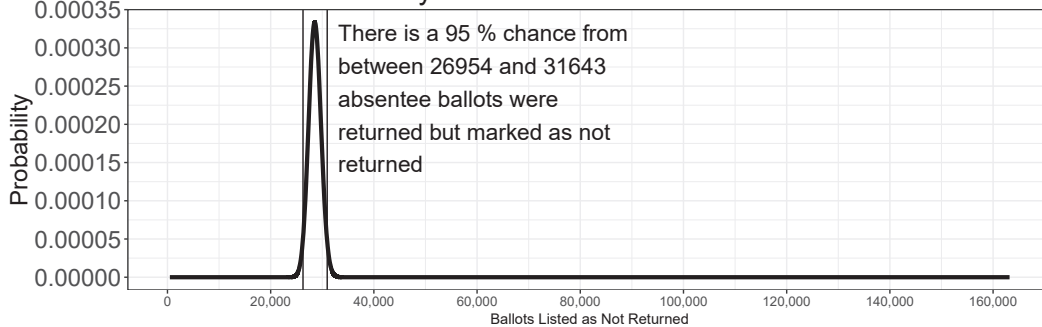
Probability of numbers of absentee ballots returned but listed as not returned for Michigan



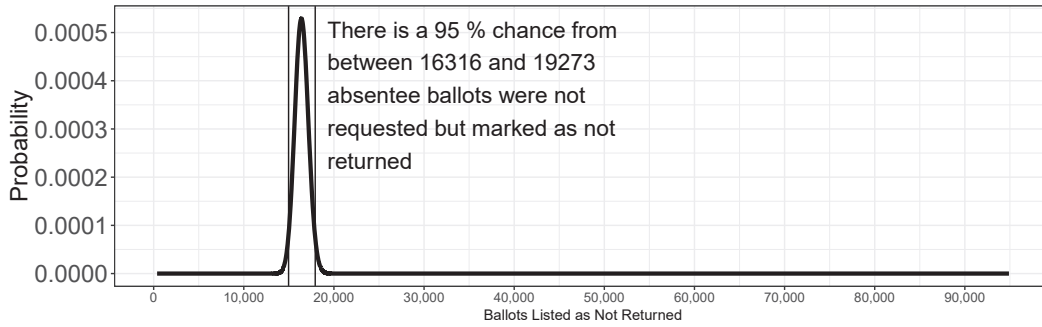
Probability of numbers of un-requested absentee ballots listed as not returned for Pennsylvania



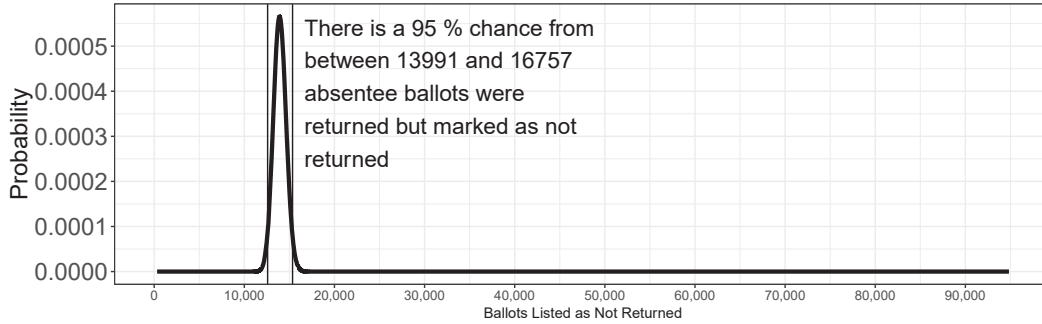
Probability of numbers of absentee ballots returned but listed as not returned for Pennsylvania



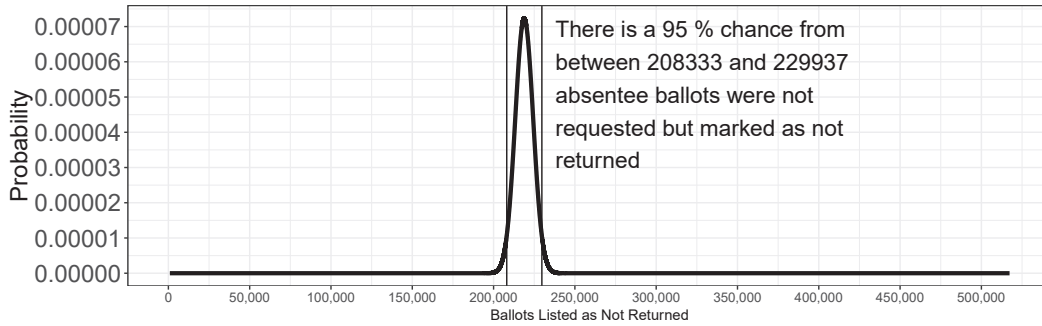
Probability of numbers of un-requested absentee ballots listed as not returned for Wisconsin



Probability of numbers of absentee ballots returned but listed as not returned for Wisconsin



Probability of numbers of un-requested absentee ballots listed as not returned for Arizona



Probability of numbers of absentee ballots returned but listed as not returned for Arizona

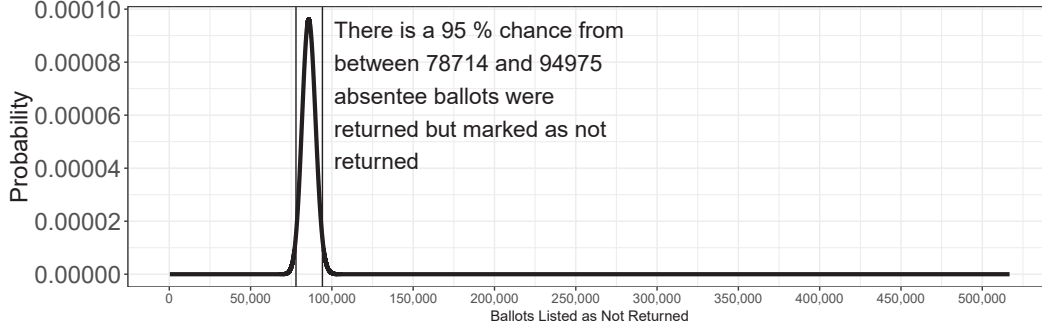


EXHIBIT 2 A

AZ Unreturned Live Agent - Mass Markets

	11/15/2020	11/16/2020	11/17/2020
5,604 Completes	745	1,881	2,978
684 Q4=01	116	212	356
1,945 VM Message Left	90	657	1,198
2,975 up/RC	539	1,012	1,424
74,437 No Answer	6,764	25,056	42,617
1,663 Numbers/Language	245	384	1,034
100.00% List Penetration			
81,708 Data Loads			

	11/15/2020	11/16/2020	11/17/2020
Q1 - May I please speak to <lead on screen>?			
1,812	307	554	951
40.05% A-Reached Target			
335	80	124	131
7.40% Uncertain			
2,377	382	854	1,141
52.54% X = Refused			
0			
0.00%			
4,524	769	1,532	2,223
100.00% Sum of All Responses			

	11/15/2020	11/16/2020	11/17/2020
Q2 - Did you request Absentee Ballot in state of AZ?			
1,120	210	361	549
45.00% A-Yes [Go to Q3]			

885	35.56%	B-No [Go to Q4]	162	286	437
24	0.96%	Member) [Go to Q3]	5	9	10
21	0.84%	Member) [Go to Q4]	3	10	8
72	2.89%	E-Unsure [Go to Close A]	10	18	44
7	0.28%	[Go to Close A]	-	1	6
360	14.46%	X = Refused	45	69	246
2,489	100.00%	Sum of All Responses	435	754	1,300

		Response	11/15/2020	11/16/2020	11/17/2020
344	16.16%	A-Yes [Go to Q4]	67	112	165
696	32.69%	B-No [Go to Close A]	116	237	343
11	0.52%	Member) [Go to Q4]	2	2	7
9	0.42%	Member) [Go to Close A]	1	4	4
14	0.66%	Close A]	3	4	7
1,055	49.55%	X = Refused	201	326	528
2,129	100.00%	Sum of All Responses	390	685	1,054

		Response	11/15/2020	11/16/2020	11/17/2020
678	82.48%	Q5]	116	212	350
144	17.52%	B-Refused [Go to Q5]	38	50	56

0	0.00%				
0	0.00%				
822	100.00%	Sum of All Responses	154	262	406

Q5 - Can you provide us your email address?		Response	11/15/2020	11/16/2020	11/17/2020
127	18.57%	01-Yes [Go to Close B]	24	36	67
557	81.43%	02-No [Go to Close B]	92	176	289
0	0.00%				
684	100.00%	Sum of All Responses	116	212	356

EXHIBIT 2 B

AZ Unreturned Live Agent - Mass Markets

	11/15/2020	11/16/2020	11/17/2020
5,604 Completes	745	1,881	2,978
684 Q4=01	116	212	356
1,945 VM Message Left	90	657	1,198
2,975 up/RC	539	1,012	1,424
74,437 No Answer	6,764	25,056	42,617
1,663 Numbers/Language	245	384	1,034
100.00% List Penetration			
81,708 Data Loads			

	11/15/2020	11/16/2020	11/17/2020
Q1 - May I please speak to <lead on screen>?			
1,812	307	554	951
40.05% A-Reached Target			
335	80	124	131
7.40% Uncertain			
2,377	382	854	1,141
52.54% X = Refused			
0			
0.00%			
4,524	769	1,532	2,223
100.00% Sum of All Responses			

	11/15/2020	11/16/2020	11/17/2020
Q2 - Did you request Absentee Ballot in state of AZ?			
1,120	210	361	549
45.00% A-Yes [Go to Q3]			

885	35.56%	B-No [Go to Q4]	162	286	437
24	0.96%	Member) [Go to Q3]	5	9	10
21	0.84%	Member) [Go to Q4]	3	10	8
72	2.89%	E-Unsure [Go to Close A]	10	18	44
7	0.28%	[Go to Close A]	-	1	6
360	14.46%	X = Refused	45	69	246
2,489	100.00%	Sum of All Responses	435	754	1,300

		Response	11/15/2020	11/16/2020	11/17/2020
344	16.16%	A-Yes [Go to Q4]	67	112	165
696	32.69%	B-No [Go to Close A]	116	237	343
11	0.52%	Member) [Go to Q4]	2	2	7
9	0.42%	Member) [Go to Close A]	1	4	4
14	0.66%	Close A]	3	4	7
1,055	49.55%	X = Refused	201	326	528
2,129	100.00%	Sum of All Responses	390	685	1,054

		Response	11/15/2020	11/16/2020	11/17/2020
678	82.48%	Q5]	116	212	350
144	17.52%	B-Refused [Go to Q5]	38	50	56

0	0.00%				
0	0.00%				
822	100.00%	Sum of All Responses	154	262	406

Q5 - Can you provide us your email address?		Response	11/15/2020	11/16/2020	11/17/2020
127	18.57%	01-Yes [Go to Close B]	24	36	67
557	81.43%	02-No [Go to Close B]	92	176	289
0	0.00%				
684	100.00%	Sum of All Responses	116	212	356

EXHIBIT 2 C

MI Unreturned Live Agent - Mass Markets

	11/15/2020	11/16/2020	11/17/2020
3,815 Completes	-	990	2,825
248 Q4=01	-	36	212
1,257 VM Message Left	-	388	869
2,310 up/RC	-	566	1,744
62,569 No Answer	-	15,482	47,087
3,644 Numbers/Language	-	570	3,074
100.00% List Penetration			
70,030 Data Loads			

	11/15/2020	11/16/2020	11/17/2020
Q1 - May I please speak to <lead on screen>?			
958 23.65% A-Reached Target	-	158	800
142 3.51% Uncertain	-	57	85
2,950 72.84% X = Refused	-	883	2,067
0 0.00%			
4,050 100.00% Sum of All Responses	-	1,098	2,952

	11/15/2020	11/16/2020	11/17/2020
Q2 - Did you request Absentee Ballot in state of MI?			
752 49.64% A-Yes [Go to Q3]	-	167	585

239	15.78%	B-No [Go to Q4]	-	39	200
50	3.30%	Member) [Go to Q3]	-	5	45
17	1.12%	Member) [Go to Q4]	-	2	15
37	2.44%	E-Unsure [Go to Close A]	-	4	33
11	0.73%	Moment [Go to Close A]	-	2	9
409	27.00%	X = Refused	-	63	346
1,515	100.00%	Sum of All Responses	-	282	1,233

			11/15/2020	11/16/2020	11/17/2020
Q3 - Did you mail your ballot back?	Response				
232	21.28%	A-Yes [Go to Q4]	-	41	191
472	43.30%	B-No [Go to Close A]	-	109	363
10	0.92%	Member) [Go to Q4]	-	2	8
28	2.57%	Member) [Go to Close A]	-	2	26
22	2.02%	Close A]	-	5	17
326	29.91%	X = Refused	-	60	266
1,090	100.00%	Sum of All Responses	-	219	871

			11/15/2020	11/16/2020	11/17/2020
Q4 - Can you please give us the best phone number to reach you at?	Response				
246	69.89%	to Q5]	-	36	210
106	30.11%	B-Refused [Go to Q5]	-	27	79

0	0.00%				
0	0.00%				
352	100.00%	Sum of All Responses	-	63	289

Q5 - Can you provide us your email address?		Response	11/15/2020	11/16/2020	11/17/2020
18	7.26%	01-Yes [Go to Close B]	-	5	13
230	92.74%	02-No [Go to Close B]	-	31	199
0	0.00%				
248	100.00%	Sum of All Responses	-	36	212

EXHIBIT 2 D

0270 PA Absentee Live ID Topline

	11/9/2020	11/10/2020	11/11/2020
18037 Completes	4419	13618	0
834 survey** - Q4=01	178	656	
14,203 Machines	3465	10738	
3,000 Hang up/RC	776	2224	
3,521 Numbers/Languag	556	2965	
0 MA			
87.70% List Penetration			
24,581 Data Loads	24,581		

	9-Nov	10-Nov	11-Nov
Q1 - May I please speak to <lead on screen>?			
2,262	593	1,669	
422	102	320	
298	77	221	
739	160	579	
2,982	932	2789	0

	9-Nov	10-Nov	11-Nov
Q2 - Did you request an absentee ballot?			
1,114	331	783	
531	131	400	

36	1.42%	confirmed "Yes" [Go to Q3]	12	24
25	0.99%	confirmed "No" [Go to Q4]	9	16
91	3.59%	5. Unsure. [Go to Q3].	25	66
89	3.51%	moment. [Go to Close A]	17	72
544	21.44%	A]	105	439
107	4.22%	X = Refused <Go to CLOSE A>	29	78
147	5.79%	Q = Hangup <Go to CLOSE A>	36	111
2,537	100.00%	Sum of All Responses	695	1989
				0

Q3 - Did you mail back that ballot?		Response	9-Nov	10-Nov	11-Nov
452	39.75%	1. Yes. [Go to Go to Q4].	90	362	
632	55.58%	2. No [Go to Close A].	229	403	
11	0.97%	confirmed "Yes" [Go to Q4]	1	10	
11	0.97%	confirmed "No" [Go to Close A]	4	7	
15	1.32%	5. Unsure. [Go to Close A].	6	9	
2	0.18%	moment. [Go to Close A]	0	2	
14	1.23%	X = Refused <Go to CLOSE A>	5	9	
13	1.14%	Q = Hangup <Go to CLOSE A>	8	5	
1,137	100.00%	Sum of All Responses	343	807	0

Q4 - Can you please give us the best phone number to reach you at?		Response	9-Nov	10-Nov	11-Nov
834	87.61%	01 = Yes <Go to CLOSE B>	178	656	
118	12.39%	X = Refused <Go to CLOSE A>	36	82	
67	7.04%	Q = Hangup <Go to CLOSE A>	17	50	
952	100.00%	Sum of All Responses	231	788	0

EXHIBIT 2 E

0276 GA Unreturned_Absentee Live ID Topline

	11/16/2020	11/17/2020
15179 Completes	8143	7036
184 Q5=01 or 02	64	120
13,479 Answering Machines	7090	6389
1,516 up/RC	989	527
4,902 Numbers/Language	2436	2466
0 MA	0	0
58.45% List Penetration		
34,355 Data Loads	34,355	

Q1 - May I please speak to <lead on screen>?	Response	16-Nov	17-Nov
767	1. Reached Target [Go to Q2].	446	321
255	[Go to Q2].	165	90
153	X = Refused <Go to CLOSE A>	104	49
385	Q = Hangup <Go to CLOSE A>	267	118
1,175	Sum of All Responses	982	578

Q2 - Did you request an absentee ballot?	Response	16-Nov	17-Nov
591	1. Yes. [Go to Go to Q3].	343	248
128	2. No. [Go to Q4].	84	44

39	4.05%	member confirmed "Yes" [Go to	24	15
14	1.45%	member confirmed "No" [Go to Q4]	11	3
40	4.15%	5. Unsure. [Go to Q3].	26	14
82	8.51%	moment. [Go to Close A]	48	34
70	7.26%	X = Refused <Go to CLOSE A>	42	28
58	6.02%	Q = Hangup <Go to CLOSE A>	33	25
964	100.00%	Sum of All Responses	611	411

Q3 - Did you mail back that ballot?		Response	16-Nov	17-Nov
240	38.52%	1. Yes. [Go to Go to Q4].	149	91
317	50.88%	2. No. [Go to Close A].	174	143
17	2.73%	member confirmed "Yes" [Go to	10	7
9	1.44%	member confirmed "No" [Go to	4	5
24	3.85%	Close A]	14	10
11	1.77%	5. Unsure. [Go to Close A].	8	3
5	0.80%	moment. [Go to Close A]	5	0
7	1.12%	X = Refused <Go to CLOSE A>	3	4
623	100.00%	Q = Hangup <Go to CLOSE A>	367	263
		Sum of All Responses		

Q4 - Can you please give us the best phone number to reach you		Response	16-Nov	17-Nov
313	82.15%	01 = Yes <Go to Q5>	205	108
49	12.86%	02 = No <Go to Q5>	26	23
19	4.99%	X = Refused <Go to CLOSE A>	13	6
18	4.72%	Q = Hangup <Go to CLOSE A>	10	8

381	100.00%	Sum of All Responses	254	145
Q5 - May we please have an email address to follow-up as well?				
99	28.86%	01 = Yes <Go to CLOSE B>	64	35
229	66.76%	02 = No <Go to CLOSE B>	144	85
15	4.37%	X = Refused <Go to CLOSE A>	11	4
19	5.54%	Q = Hangup <Go to CLOSE A>	12	7
343	100.00%	Sum of All Responses	231	131

EXHIBIT 2 F

William M. Briggs, PhD

Statistician to the Stars!

matt@wmbriggs.com

917-392-0691

1. EXPERIENCE

- (1) 2016: AUTHOR OF *Uncertainty: The Soul of Modeling, Probability & Statistics*, a book which argues for a complete and fundamental change in the philosophy and practice of probability and statistics. Eliminate hypothesis testing and estimation, and move to verifiable predictions. This includes AI and machine learning. Call this The Great Reset, but a good one.
- (2) 2004-2016 ADJUNCT PROFESSOR OF STATISTICAL SCIENCE, CORNELL UNIVERSITY, ITHACA, NEW YORK
I taught a yearly Masters course to people who (rightfully) hate statistics. Interests: philosophy of science & probability, epistemology, epidemiology (ask me about the all-too-common epidemiologist fallacy), Bayesian statistics, medicine, climatology & meteorology, goodness of forecasts, over-confidence in science; public understanding of science, limitations of science, scientism; scholastic metaphysics (as it relates to epistemology).
- (3) 1998-PRESENT. STATISTICAL CONSULTANT, VARIOUS COMPANIES
Most of my time is spent coaxing people out of their money to tell them they are too sure of themselves. All manner of analyses cheerfully undertaken. Example: Fraud analysis; I created the *Wall Street Journal's* College Rankings. I consultant regularly at Methodist and other hospitals, start-ups, start-downs, and with any institution willing to fork it over.
- (4) 2003-2010. RESEARCH SCIENTIST, NEW YORK METHODIST HOSPITAL, NEW YORK
Besides the usual, I sit/sat on the Institutional Review Committee to assess the statistics of proposed research. I was an Associate Editor for *Monthly Weather Review* (through 2011). Also a member of the American Meteorological Society's Probability and Statistics Committee (through 2011). At a hospital? Yes, sir; at a hospital. It rains there, too, you know.
- (5) FALL 2007, FALL 2010 VISITING PROFESSOR OF STATISTICS, DEPARTMENT OF MATHEMATICS, CENTRAL MICHIGAN UNIVERSITY, MT. PLEASANT, MI
Who doesn't love a visit from a statistician? Ask me about the difference between "a degree" and "an education."
- (6) 2003-2007, ASSISTANT PROFESSOR STATISTICS, WEILL MEDICAL COLLEGE OF CORNELL UNIVERSITY, NEW YORK, NEW YORK
Working here gave me a sincere appreciation of the influences of government money; grants galore.
- (7) 2002-2003. GOTHAM RISK MANAGEMENT, NEW YORK
A start-up then, after Enron's shenanigans, a start-down. We set future weather derivative and weather insurance contract prices that incorporated information from medium- and long-range weather and climate forecasts.
- (8) 1998-2002. DOUBLECLICK, NEW YORK
Lead statistician. Lot of computer this and thats; enormous datasets.
- (9) 1993-1998. GRADUATE STUDENT, CORNELL UNIVERSITY

Meteorology, applied climatology, and finally statistics. Was Vice Chair of the graduate student government; probably elected thanks to a miracle.

- (10) 1992-1993. NATIONAL WEATHER SERVICE, SAULT STE. MARIE, MI
Forecast storms o' the day and launched enormous balloons in the name of Science. My proudest moment came when I was able to convince an ancient IBM-AT machine to talk to an *analog*, 110 baud, phone-coupled modem, all using BASIC!
- (11) 1989-1992. UNDERGRADUATE STUDENT, CENTRAL MICHIGAN UNIVERSITY
Meteorology and mathematics. Started the local student meteorology group to chase tornadoes. Who knew Michigan had so few? Spent a summer at U Michigan playing with a (science-fiction-sounding) lidar.
- (12) 1983-1989. UNITED STATES AIR FORCE
Cryptography and other secret stuff. Shot things; learned pinochle. I adopted and became proficient with a fascinating and versatile vocabulary. Irritate me for examples. TS/SCI, etc. security clearance (now inactive).

2. EDUCATION

- (1) Ph.D., 2004, Cornell University. Statistics.
- (2) M.S., 1995, Cornell University. Atmospheric Science.
- (3) B.S., Summa Cum Laude, 1992, Central Michigan University. Meteorology and Math.

3. PUBLICATIONS

3.0.1. *Popular.*

- (1) Op-eds in various newspapers; articles in *Stream*, *Crisis Magazine*, *The Remnant*, *Quadrant*, *Quirks*; blog with ~70,000 monthly readers. Various briefs submitted to government agencies, such as California Air Resources Board, Illinois Department of Natural Resources. Talks and holding-forths of all kinds.

3.0.2. *Books.*

- (1) Richards, JW, WM Briggs, and D Axe, 2020. *UThe Price of Panic: How the Tyranny of Experts Turned a Pandemic into a Catastrophe*. Regnery. Professors Jay Richards, William Briggs, and Douglas Axe take a deep dive into the crucial questions on the minds of millions of Americans during one of the most jarring and unprecedented global events in a generation.
- (2) Briggs, WM., 2016. *Uncertainty: The Soul of Modeling, Probability & Statistics*. Springer. Philosophy of probability and statistics. A new (old) way to view and to use statistics, a way that doesn't lead to heartbreak and pandemic over-certainty, like current methods do.
- (3) Briggs, WM., 2008 *Breaking the Law of Averages: Real Life Probability and Statistics in Plain English*. Lulu Press, New York. Free text for undergraduates.
- (4) Briggs, WM., 2006 *So You Think You're Psychic?* Lulu Press, New York. Hint: I'll bet you're not.

3.0.3. *Methods.*

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