

# EXHIBIT 9

## **Declaration of Seth Keshel**

Pursuant to 28 U.S.C Section 1746, I, Seth Keshel, 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 am a trained data analyst with experience in multiple fields, including service in the United States Army as a Captain of Military Intelligence, with a one-year combat tour in Afghanistan. My experience includes political involvement requiring a knowledge of election trends and voting behavior.
3. I reside at 233 Muir Hill Dr., Aledo, TX 76008.
4. My affidavit highlights substantial deviance from statistical norms and results regarding voting patterns in Arizona.
5. All 2020-related voting totals are taken from the Decision Desk HQ unofficial tracker, are not certified, and are subject to change from the time of the creation of this affidavit.
6. Arizona is a rapidly growing state, with 287,001 new Democrat registrations and 269,164 new Republican registrations statewide since the 2016 general election. Republicans hold a 3% registration edge statewide (35.2% to 32.2%), and a 3.9% registration edge in Maricopa County (35.3% to 31.4%), the state's largest county which has cast roughly 61.1% of all votes counted statewide thus far in Arizona's 2020 presidential race.
7. Republicans have out-registered Democrats in voter registration since the March presidential primaries. Statewide, since the end of

primaries, Republicans have added 148,485 to their rolls, compared to 116,389 for Democrats. In Maricopa County, Republicans lead 87,000 to 76,417 in this time period. This is an indicator of momentum heading into the general election favoring Republicans.

8. Maricopa County has been won by the Republican candidate in every election since 1952, including in 1996 when Democrat Bill Clinton carried the state, and in 2016, when Donald Trump won the county with the weakest performance relative to registered Republicans since at least 2004. In that year, he tallied just 97 votes per 100 registered Republicans in the county, below George W. Bush's total in 2004 (100), John McCain's in 2008 (108), and Mitt Romney's in 2012 (109). Statewide in 2016, Trump's numbers lagged the previous three Republican votes per 100 registered statewide (105, 110, and 110), at just 101 votes per 100 registered Republicans. This year, with counts not certified and subject to adjustment, Trump's performance in Maricopa County equals Mitt Romney's high of 109 votes per 100 registered Republicans and matches two previous highs of 110 votes per 100 registered Republicans statewide. This indicates strong base support, crossover support, independent support, and minimal party defections. Biden's totals however, per 100 registered Democrats, are well above established trendlines for Democrats. Statewide, he has 121 votes per 100 registered Democrats, 14 votes higher than the previous high (Obama, 2012, 107 votes), and 15 higher than Hillary Clinton's total in 2016. In Maricopa County, Biden has 128 votes per 100 registered Democrats, a full 10 votes higher than Barack Obama's 2012 total, and 14 above

Hillary Clinton's. These figures can be observed in Exhibit A to this affidavit.

9. In Maricopa County, Democrats grew by 118,116 votes (from Al Gore to John Kerry) between 2000 and 2004. Hillary Clinton added 100,619 votes to Barack Obama's 2012 total in 2016. Thus far in the count, Joe Biden has added 337,646 votes in Maricopa County in a single cycle, a 48.0% increase in a county that already had a high number of Democratic votes relative to the other large counties in the nation. This comes as President Trump has reconsolidated his lost voter base from 2016 with his own 33.2% increase in the county.
10. Maricopa County received 1.52 new Democratic votes for every new registered Democrat in 2008, reversed into a losing number in 2012, and then received 0.93 new votes for every new registered Democrat in 2016. This year, they are receiving 1.72 new Democratic votes for every new registered Democrat in the county.
11. Among comparable 2016 counties (within 100,000 votes of Maricopa's 2016 Democratic vote total), Maricopa County towers above the rest in percentage of new Democratic votes, with 48.0% more (337,646 new Democrat votes) than in 2016, a virtually impossible number. Comparable counties are also growing counties with expanding voter rolls, with none of the counties won by a Republican presidential nominee since 2004. This information is available in Exhibit B.
  - a. Orange County, California, has 198,203 (32.5%) more new Democrat votes.

- b. San Diego County, California, has 221,302 (30.1%) more new Democrat votes.
  - c. Harris County, Texas, has 203,999 (28.8%) more new Democrat votes.
  - d. King County, Washington, has 185,810 (25.9%) more new Democrat votes.
  - e. Miami-Dade County, Florida, has lost 6,499 (-1.0%) Democrat votes since 2016.
12. Excepting Miami-Dade for its notable loss in raw Democratic votes, Maricopa County Democratic vote growth in line with Orange, San Diego, Harris, and King Counties should align with slightly more than 900,000 votes in the county for Joe Biden, not 1.04 million.
13. Pima County, Arizona, has also shown 35.8% Democratic raw vote growth (80,320 votes) in a single cycle. President Trump has increased his vote total in the county by 24.1%, with a vote total now surpassing Obama's total in this county in 2012. The previous high for increase in this county for Democrats was 45,440 votes in 2004.
14. Of the remaining 13 counties, these show proper progression in keeping with historic party registration trends:
- a. Pinal
  - b. Graham
  - c. Greenlee
  - d. Santa Cruz
  - e. Yuma
  - f. La Paz

- g. Mohave
- h. Gila
- i. Yavapai

15. These 4 counties show deviation from standard progression associated with historic party registration trends:

- a. Apache – shifted one point in favor of Republicans in registration since 2016 but gave Trump a defeat margin 2,647 votes greater than in 2016, as Biden added a record number of votes in one cycle despite registration trends.
- b. Coconino – shifted three points in favor of Democrats but has a heavier than expected margin in favor of Biden, particularly since Republicans also gained in this county.
- c. Navajo – trended four points in favor of Republican registration since 2016, but Trump’s margin of victory remained all but unchanged, save for 156 votes, even though Trump added nearly 7,000 more votes to his total in a county heavily trending Republican.
- d. Cochise – trended four points in favor of Republican registration since 2016, but Trump’s margin of victory is nearly unchanged, up just 297 votes.



Seth Keshel

18 Nov. 2020

Aledo, Texas

# **EXHIBIT 9 A&B**

**More Mega Counties within 100,000 votes (+ or -) of 2016 Maricopa Dem Vote (702,907)  
 % Increase in Dem Votes in 2020**

\*Pima County included for comparison in Arizona

\*Orange, San Diego, Harris, and King average 29.2% increase in Dem votes

-A 29.2% Increase in Maricopa County would mean 205,249 more Dem Votes (908,156 total)

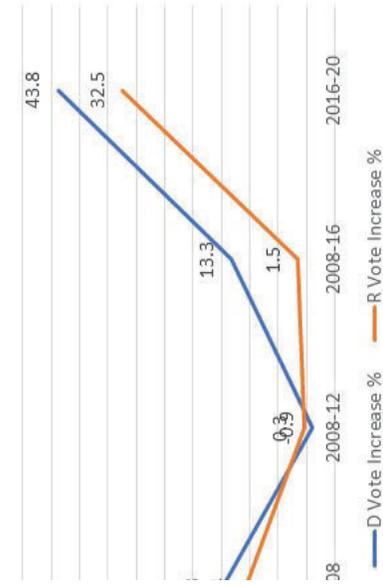
\*Previous highs for one-cycle increase in Dem Votes

-Maricopa – 118,166 (2004)

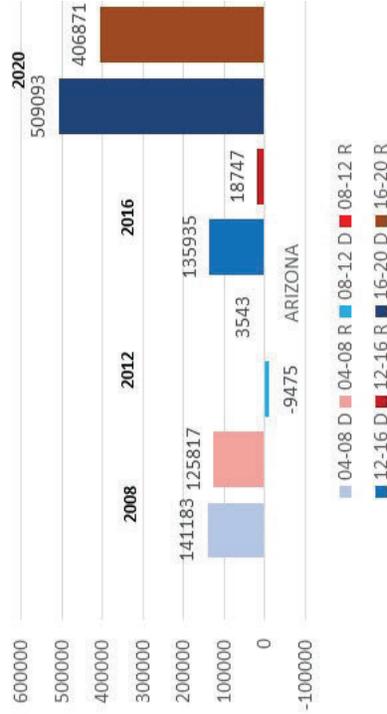
-Pima – 45,440 (2004)

UNITIES	% Increase Dem Votes 16-20	2016 Dem Votes	2020 Dem Votes	Amount
LA (AZ)	48.03%	702,907	1,040,533	337,626
LA (CA)	35.75%	224,661	304,981	80,320
LA (CA)	32.49%	609,961	808,164	198,203
LA (CA)	30.09%	735,476	956,778	221,302
LA (TX)	28.82%	707,914	911,913	203,999
LA (TX)	25.87%	718,322	904,132	185,810
LA (FL)	-1.04%	624,146	617,647	-6,499

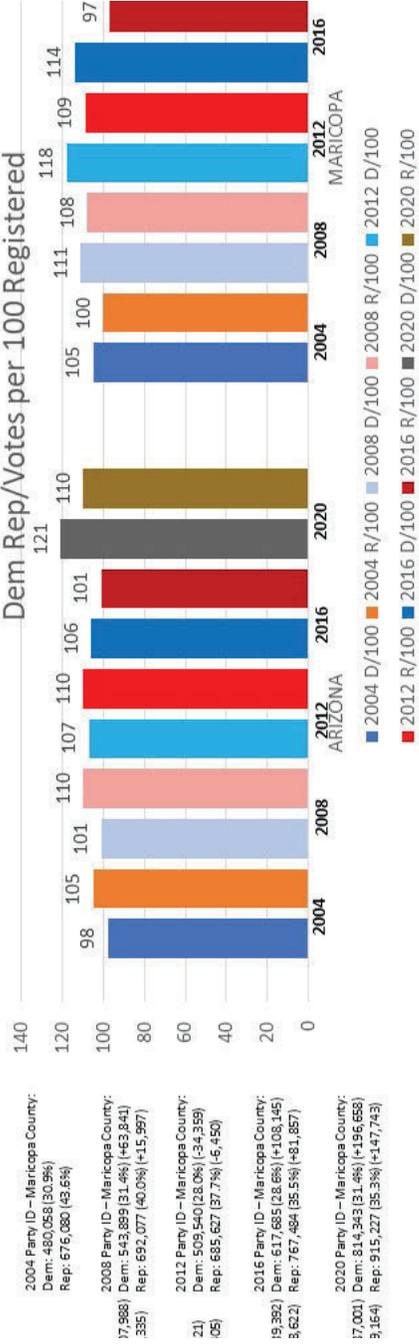
% Increase in Raw Votes by Party  
Arizona



Votes Added From Previous Election by Party  
Arizona



Dem Rep/Votes per 100 Registered



2004 Party ID - Maricopa County:  
Dem: 480,058 (30.9%)  
Rep: 676,080 (43.6%)

2008 Party ID - Maricopa County:  
Dem: 543,895 (31.4%) (+63,841)  
Rep: 692,077 (40.0%) (+15,997)

2012 Party ID - Maricopa County:  
Dem: 503,540 (28.0%) (-40,355)  
Rep: 685,627 (37.7%) (-6,450)

2016 Party ID - Maricopa County:  
Dem: 617,685 (28.6%) (+108,145)  
Rep: 767,484 (35.5%) (+81,857)

2020 Party ID - Maricopa County:  
Dem: 314,343 (13.1%) (-303,342)  
Rep: 915,227 (35.3%) (+147,743)

# **EXHIBIT 9 S**

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