

Case No.

*In re. Investigation of election irregularities affecting  
counties within the 9th Congressional District*

# Exhibit

# 7.1.2.2

Description: McCready evidentiary exhibits submitted under Paragraph 8 of the Order of Proceedings (Exhibit 6.1.1).



**NORTH CAROLINA**

State Board of Elections & Ethics Enforcement



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Suite 600  
Washington, D.C. 20005-3960

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PerkinsCoie.com

December 21, 2018

Marc E. Elias  
Jonathan S. Berkon  
MElias@perkinscoie.com  
JBerkon@perkinscoie.com  
D. +1.202.434.1669  
F. +1.202.654.9684

Mr. Joshua Malcolm  
Chairman  
North Carolina State Board of Elections  
430 N. Salisbury Street  
Raleigh, NC 27603-5918

Dear Chairman Malcolm:

We write to you on behalf of our client, Dan McCready, candidate for U.S. Representative for North Carolina's Ninth Congressional District. Pursuant to the Order of Proceedings dated December 17, 2018, we submit the following evidentiary information:

1. 14 affidavits from affected voters:
  - a. Affidavit of Callie S. Locklear
  - b. Affidavit of Cetire Retamar
  - c. Affidavit of Christopher Eason
  - d. Affidavit of Datesha Montgomery
  - e. Affidavit of Douglas Bullard
  - f. Affidavit of Emma Shipman
  - g. Supplemental Affidavit of Emma Shipman
  - h. Affidavit of Hazel Guyton
  - i. Affidavit of Lonnie I. Bullard
  - j. Affidavit of Lucy M. Young
  - k. Affidavit of Melissa Williams
  - l. Affidavit of Melody Covington
  - m. Affidavit of Nichole M. Nimmons
  - n. Affidavit of Stephanie E. Page
  
2. 6 affidavits from witnesses that provide further insight into the Bladen County Board of Elections operations and Leslie McCrae Dowless Jr.'s actions during the 2018 general election process:
  - a. Affidavit of Agnes Willis
  - b. Affidavit of Ben Snyder
  - c. Affidavit of Dwight Sheppard
  - d. Affidavit of Herman Dunn
  - e. Affidavit of Jens Lutz
  - f. Affidavit of Kenneth Simmons

Mr. Joshua Malcolm  
December 21, 2018  
Page 2

3. Report on Absentee Ballots in the 2018 North Carolina Congressional District 9 General Election

Please do not hesitate to contact us if you have any questions.

Very truly yours,



Marc E. Elias  
Jonathan S. Berkon

JSB

AFFIDAVIT OF CALLIE S. LOCKLEAR

North Carolina

County of Robeson

Callie S. Locklear, appearing before the undersigned notary and being duly sworn, says that:

I, Callie S. Locklear, do declare the following under penalty of perjury:

1. I am over the age of 18 and a resident of the state of North Carolina. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth herein.
3. I reside at 1185 N. Roberts Avenue, #A3, Lumberton, North Carolina. I am a registered North Carolina voter at this address and was eligible to vote in the November 6, 2018 general election.
4. I requested an absentee ballot for the 2018 general election.
5. When I received my absentee ballot, I filled out the ballot and sealed the ballot inside the absentee ballot envelope.
6. During the early in-person voting period, I decided to bring my sealed ballot envelope to a "one-stop" absentee voting location.
7. When I arrived at the one-stop absentee voting location a man standing outside the location was collecting ballots envelopes.
8. I did not know this man personally.
9. This man offered to deliver my sealed absentee ballot envelope to the proper county officials inside the one-stop absentee voting location.
10. I gave my sealed absentee ballot envelope to the man to deliver to the proper county elections officials.
11. I do not know whether my absentee ballot envelope was submitted to the proper county officials.
12. \_\_\_\_\_  
\_\_\_\_\_
13. \_\_\_\_\_  
\_\_\_\_\_

[Signature Page to Follow]

I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Name: Callie S. Locklear

Signature: Callie S Locklear

Date: 12/18/18

Sworn to (or affirmed) and subscribed before me this the 18<sup>th</sup> day of December, 20 18.



Sharon Hunt  
Notary Public

Sharon Hunt  
Notary's printed or typed name

My commission expires 2/22, 20 19.

AFFIDAVIT OF ~~Bob~~ Letive Retamar

North Carolina

County of Bladen

Letive Retamar, appearing before the undersigned notary and being duly sworn, says that:

I, Letive Retamar, do declare the following under penalty of perjury:

1. I am over the age of 18 and a resident of the state of North Carolina. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.

2. I suffer no legal disabilities and have personal knowledge of the facts set forth herein.

3. I reside at 709 Monte Lott Highway Dr., Bladen, NC. I am a registered North Carolina voter at this address and was eligible to vote in the November 6, 2018, general election.

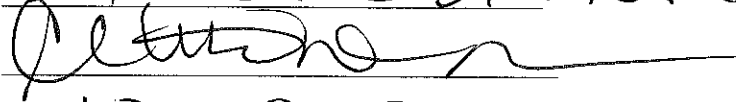
4. I received an absentee ballot by mail which I did not request,

5. I went to early voting on Friday, Nov. 2, 2018. I brought the ballot with me. An election official asked for my absentee ballot, so I handed it to her. I do not know what she did with it.


[Signature Page to Follow]

I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Name: ~~for~~ Cetire D. Retamar

Signature: 

Date: 12-18-18

Witness: 

Printed Name: Matthew J. Dixon

**AFFIDAVIT OF CHRISTOPHER EASON**

North Carolina

County of Bladen

Christopher Eason, appearing before the undersigned notary and being duly sworn, says that:

I, Christopher Eason, do declare the following under penalty of perjury:

1. I am over the age of 18 and a resident of the state of North Carolina. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth herein.
3. I reside at 401 Edwards Ave, Bladenboro, North Carolina. I am a registered North Carolina voter at this address and was eligible to vote in the November 6, 2018 general election.
4. I received an absentee ballot for the 2018 general election.
5. Leslie McCrae Dowless Jr., also known as McCrae Dowless, came to my residence and asked that I give him my absentee ballot.
6. I signed the absentee ballot envelope but left the ballot completely blank. I did not make any selections in any of the contests on the ballot.
7. I gave McCrae Dowless the absentee ballot envelope and ballot. I did not seal the ballot in the absentee ballot envelope.

8. I know McCrae Dowless personally.  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

[Signature Page to Follow]



I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Name: Christopher Eason

Signature: Chris Eason

Date: 12 7 18

Sworn to (or affirmed) and subscribed before me this the 7<sup>th</sup> day of December, 2018.



Sandra Whitley  
Notary Public

Sandra Whitley  
Notary's printed or typed name

My commission expires March 12, 2023

Affidavit of Datesha Montgomery

STATE OF NORTH CAROLINA  
COUNTY OF BLADEN

The Undersigned, Datesha Montgomery, being duly sworn deposes and says:

- 1. I am over the age of 18 and a resident of the state of North Carolina. I have personal knowledge of the facts herein, and, if called as a witness, can testify completely thereto.
- 2. I suffer no legal disabilities and have personal knowledge of the facts set forth below.
- 3. On Wednesday evening about two weeks from todays date which is October 12, 2018, a young whit lady came by and asked for my absentee ballot. She stated that she was collecting peoples ballots in the area. She had just come from another ladies house. I filled out two names on the ballot, Hakeem Brown for Sheriff and Vince Rozier for board of education. She stated the others were not important. I gave her the ballot and she said she would finish it herself. I signed the ballot and she left. It was not sealed up at any time.

I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Executed this 29 day of October 2018

Datesha Montgomery  
Datesha Montgomery

Michael Caspell  
Witness

State of NC

County of Bladen

Subscribed and sworn before me, I Cathy Newkirk. A Notary Public In and for the County and State above, do hereby declare ~~The~~ Affiant,

Datesha Montgomery did appear personally before me and furnish to me adequate identification of proving their identity and stated that She (he/she) did sign this document of their own free will on this 29 day of October 2018.



Cathy Newkirk  
Notary Public

My Commission expires: 3-12-2022

AFFIDAVIT OF DOUGLAS BULLARD

North Carolina

County of Bladen

Douglas Bullard, appearing before the undersigned notary and being duly sworn, says that:

I, Douglas Bullard, do declare the following under penalty of perjury:

- 1. I am over the age of 18 and a resident of the state of North Carolina. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.
- 2. I suffer no legal disabilities and have personal knowledge of the facts set forth herein.
- 3. I reside at 3109 Grimsley Farm Road, Bladenboro, North Carolina. I am a registered North Carolina voter at this address and was eligible to vote in the November 6, 2018 general election.
- 4. Prior to the 2018 general election, Lisa Britt came to my residence to ask whether I would like to submit an absentee ballot request form.
- 5. I know Lisa Britt personally.
- 6. Since I normally vote in-person, I declined to submit an absentee ballot request form for the 2018 general election.
- 7. I have been told that my name, residence, and signature are listed on an absentee ballot request form for the 2018 general election.
- 8. I have reviewed this request form, which includes my name, residence, and purported signature, attached as Exhibit A.
- 9. While the address listed on this request form is my residence, I did not fill out or sign this request form.

10. \_\_\_\_\_

\_\_\_\_\_

11. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

[Signature Page to Follow]

I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Name: Douglas Bullard

Signature: Douglas Bullard

Date: 12/20/2018

Sworn to (or affirmed) and subscribed before me this the 20<sup>th</sup> day of December, 2018.



Sandra Whitley  
Notary Public

Sandra Whitley  
Notary's printed or typed name

My commission expires March 12, 2023



# State Absentee Ballot Request Form

North Carolina

TO: BLADEN COUNTY BOARD OF ELECTIONS

Physical Address  
301 S Cypress St  
Elizabethtown NC  
28337

Mailing Address  
PO Box 512  
Elizabethtown

PHONE: 910-862-6951  
bladen.boe@ncsbe.gov

FAX: 910-862-7820

P10

FRAUDULENTLY OR FALSELY COMPLETING THIS FORM IS A CLASS I FELONY UNDER CHAPTER 163 OF THE NC GENERAL STATUTES.

I am requesting an absentee ballot for the: GENERAL ELECTION on NOVEMBER 6, 2018  
Election Type (Primary, General, Municipal, Special, etc.) Election Date

### Voter Information

Last Name <u>Bullard</u>		First Name <u>Douglas</u>		Middle Name <u>Earl</u>	Suffix	Date of Birth [REDACTED]
Home Address (NC Residential Address.) <u>3109 Grimsley Farm Rd</u>				Mailing Address (if different than home address.)		
City <u>Bladenboro</u>		State <u>NC</u>	Zip Code <u>28320</u>	City	State	Zip Code
Have you lived at this address for more than 30 days? <input type="checkbox"/> Yes <input type="checkbox"/> No <small>If "No," indicate the date of your move: <u>1/1</u></small>				County of Residence	Previous Name (if applicable)	
You must provide at least one identification number below. (for see instructions) <small>NC License or ID Number</small>				Voter Registration No. <small>Optional</small>	Phone (optional)	Email (optional)
<u>X X X - X X [REDACTED]</u>				[REDACTED]	[REDACTED]	[REDACTED]

### Absentee Voting Information

Absentee Mailing Address (Where should the ballot be mailed?)		City <u>Bladenboro, NC</u>	State <u>NC</u>	Zip Code
If voter is registered as <i>Unaffiliated</i> and requesting a ballot for a partisan primary, choose a primary ballot preference. <input type="checkbox"/> Democratic <input type="checkbox"/> Republican <input type="checkbox"/> Libertarian <input type="checkbox"/> Non-partisan				
If voter is a patient in a hospital, clinic, nursing home or rest home, please indicate whether you will need assistance in marking your ballot. <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," what is the name and address of the hospital or facility:				
If requesting an absentee ballot on behalf of a near relative, list your name, address, contact information and relationship to the voter:				
Requestor's Name		<input type="checkbox"/> spouse <input type="checkbox"/> brother/sister <input type="checkbox"/> parent <input type="checkbox"/> grandparent <input type="checkbox"/> stepparent <input type="checkbox"/> child <input type="checkbox"/> grandchild <input type="checkbox"/> stepchild <input type="checkbox"/> mother-in-law <input type="checkbox"/> father-in-law <input type="checkbox"/> son-in-law <input type="checkbox"/> daughter-in-law <input type="checkbox"/> legal guardian		
Requestor's Address		Name of Corporation (if appointed legal guardian)		
City	State	Zip Code	Requestor's Phone	Requestor's Email

### For Military/Overseas Citizens Only (may only be signed by the voter; may not be signed by a near relative/guardian)

Select one of the options below to qualify as a military or overseas voter:

Member of the Uniformed Services or Merchant Marine on active duty and currently absent from county of residence or an eligible spouse/dependent.

U.S. citizen residing outside the U.S. temporarily or indefinitely

Current Address (Address where you are currently stationed or living overseas.)

Transmit my ballot by:  
(Military/Overseas Voters Only)     Mail     Fax     Email

Fax Number or Email Address

### Signature of Voter (voter only)

X [REDACTED]

### Signature of Near Relative/Legal Guardian (if applicable)

X 8-14-18  
Date

Date

Affidavit of Emma L Shipman

STATE OF NORTH CAROLINA  
COUNTY OF BLADEN

The Undersigned, Emma L. Shipman, being duly sworn deposes and says:

- 1. I am over the age of 18 and a resident of the state of North Carolina. I have personal knowledge of the facts herein, and, if called as a witness, can testify completely thereto.
- 2. I suffer no legal disabilities and have personal knowledge of the facts set forth below.
- 3. A young lady whom I positively identified by a choice of 4 pictures, came to my house the Sunday after Hurricane Florence and told me that she was assigned to this district to collect absentee ballots. I filled out the ballot while she waited outside and gave it to her when she came back. She took the ballot and put it in an envelope and never sealed it or asked me to sign it. Then she left. Because of the way she presented herself, I thought she was legitimate.

I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Executed this 29 day of October 2018

Emma L Shipman  
Emma. L. Shipman

Michael Casdell  
Witness

State of NC

County of Bladen

Subscribed and sworn before me, I Cathy Newkirk. A Notary Public In and for the County and State above, do hereby declare The Affiant,

Emma L. Shipman did appear personally before me and furnish to me adequate identification of proving their identity and stated that she (he/she) did sign this document of their own free will on this 29 day of October 2018.

Seal



Cathy Newkirk  
Notary Public

My Commission expires: 3-12-2022

## SUPPLEMENTAL AFFIDAVIT OF EMMA SHIPMAN

North Carolina

County of Bladen

Emma Shipman, appearing before the undersigned notary and being duly sworn, says that:

I, Emma Shipman, do declare the following under penalty of perjury:

1. I am over the age of 18 and a resident of the state of North Carolina. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth herein.
3. I reside at 196 Burden Road, Tar Heel, North Carolina. I am a registered North Carolina voter at this address and was eligible to vote in the November 6, 2018 general election.
4. This affidavit is supplemental to my affidavit dated October 29, 2018 submitted to the State Board of Elections on November 29, 2018, attached hereto.
5. As I previously stated, a young woman came to my residence to collect my absentee ballot. I gave this young woman my absentee ballot and absentee ballot envelope to deliver to the proper county election officials.
6. I did not seal the absentee ballot in the absentee ballot envelope.
7. After I gave my absentee ballot and absentee ballot envelope to this young woman, a third party checked to see whether my ballot had been received by the proper county election officials. I was told that my ballot had not been received by the proper county election officials.
8. I then prepared and signed a complaint which was filed with the Bladen County Board of Elections regarding the status of my absentee ballot.
9. Days later, that same young woman who had collected my absentee ballot brought my absentee ballot and absentee ballot envelope back to me.
10. I voted at a "one-stop" early, in-person voting location.

[Signature Page to Follow]

I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Name: Emma Shipman

Signature: Emma Shipman

Date: 12.20.18

Sworn to (or affirmed) and subscribed before me this the 20<sup>th</sup> day of December, 2018.



Sandra Whitley  
Notary Public

Sandra Whitley  
Notary's printed or typed name

My commission expires March 12, 2023.



**AFFIDAVIT OF HAZEL GUYTON**

North Carolina

County of Bladen

Hazel Guyton, appearing before the undersigned notary and being duly sworn, says that:

I, Hazel Guyton, do declare the following under penalty of perjury:

1. I am over the age of 18 and a resident of the state of North Carolina. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth herein.
3. I reside at 208 West Walnut Street, Apartment 6D, Bladenboro Apartments, Bladenboro, North Carolina. I am a registered North Carolina voter at this address and was eligible to vote in the November 6, 2018 general election.
4. I requested an absentee ballot in the recent election and it was mailed to me. I do this because I am disabled.
5. I filled out the absentee ballot and put it in the envelope and sealed it. Leslie McCrae Dowless Jr., also known as McCrae Dowless, came by to pick it up. He has been doing that for me for several years.
6. There was a woman with McCrae Dowless when he picked up my ballot. I didn't know her and don't recall her name.
7. I assume but don't know for sure whether McCrae Dowless turned in my ballot. I thought he was going to do that. I have known him since he was a little boy.
8. I did not vote at the polling place on Election Day.
9. McCrae Dowless told me that he was picking up ballots for other people who live in the Bladenboro Apartments.

[Signature on the Following Page]

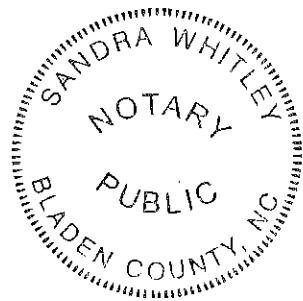
I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Name: Hazel Guyton

Signature: Hazel Guyton

Date: 12-6-2018

Sworn to (or affirmed) and subscribed before me this the 6<sup>th</sup> day of December, 2018.



Sandra Whitley  
Notary Public

Sandra Whitley  
Notary's printed or typed name

My Commission  
Expires:

3-12-2023

**AFFIDAVIT OF LONNIE I. BULLARD**

North Carolina

County of Bladen

Lonnie I. Bullard, appearing before the undersigned notary and being duly sworn, says that:

I, Lonnie I. Bullard, do declare the following under penalty of perjury:

- 1. I am over the age of 18 and a resident of the state of North Carolina. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.
- 2. I suffer no legal disabilities and have personal knowledge of the facts set forth herein.
- 3. I reside at 3109 Grimsley Farm Road, Bladenboro, North Carolina. I am a registered North Carolina voter at this address and was eligible to vote in the November 6, 2018 general election.
- 4. Prior to the 2018 general election, Lisa Britt came to my residence to ask whether I would like to submit an absentee ballot request form.
- 5. I know Lisa Britt personally.
- 6. Since I normally vote in-person, I declined to submit an absentee ballot request form for the 2018 general election.
- 7. I have been told that my name, residence, and signature are listed on an absentee ballot request form for the 2018 general election.
- 8. I have reviewed this request form, which includes my name, residence, and purported signature, attached as Exhibit A.
- 9. While the address listed on this request form is my residence, I did not fill out or sign this request form.

10. \_\_\_\_\_

11. \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

[Signature Page to Follow]

I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Name: Lonnie I. Bullard

Signature: Lonnie Irene Bullard

Date: 12/20/18

Sworn to (or affirmed) and subscribed before me this the 20<sup>th</sup> day of December, 20 18.



Sandra Whitley  
Notary Public

Sandra Whitley  
Notary's printed or typed name

My commission expires March 12, 2023.



State Absentee Ballot Request Form  
North Carolina

TO: BLADEN COUNTY BOARD OF ELECTIONS

Physical Address  
301 S Cypress St  
Elizabethtown NC  
28337

Mailing Address  
PO Box 512  
Elizabethtown

PHONE: 910-862-6951  
bladen.boe@ncsbe.gov

FAX: 910-862-7820

910

FRAUDULENTLY OR FALSELY COMPLETING THIS FORM IS A CLASS 1 FELONY UNDER CHAPTER 163 OF THE NC GENERAL STATUTES.

I am requesting an absentee ballot for the: GENERAL ELECTION on NOVEMBER 6, 2018  
*Election Type (Primary, General, Municipal, Special, etc.) Election Date*

Voter Information

Last Name <u>Bullard</u>		First Name <u>Lorrie</u>		Middle Name <u>Irene</u>	Suffix [REDACTED]
Home Address (NC Residential Address.) <u>3109 Grimsley Farm Rd</u>				Mailing Address (if different than home address.) [REDACTED]	
City <u>Bladenboro</u>		State <u>NC</u>	Zip Code <u>28320</u>	City	State Zip Code
Have you lived at this address for more than 30 days? <input type="checkbox"/> Yes <input type="checkbox"/> No			County of Residence		Previous Name (if applicable)
If "No," indicate the date of your move: <u>1/1</u>					
You must provide at least one identification number below. (or see instructions) NC License or ID Number SSN <u>X X X - X X [REDACTED]</u>			Voter Registration No. Optional <u>[REDACTED]</u>	Phone (optional) <u>[REDACTED]</u>	Email (optional)

Absentee Voting Information

Absentee Mailing Address (Where should the ballot be mailed?)		City <u>BLADEN CO. ED. OF ELEC</u>		State <u>NC</u>	Zip Code
If voter is registered as <i>Unaffiliated</i> and requesting a ballot for a partisan primary, choose a primary ballot preference. <input type="checkbox"/> Democratic <input type="checkbox"/> Republican <input type="checkbox"/> Libertarian <input type="checkbox"/> Non-partisan					
If voter is a patient in a hospital, clinic, nursing home or rest home, please indicate whether you will need assistance in marking your ballot. <input type="checkbox"/> Yes <input type="checkbox"/> No					
If "Yes," what is the name and address of the hospital or facility:					
If requesting an absentee ballot on behalf of a near relative, list your name, address, contact information and relationship to the voter:					
Requestor's Name		<input type="checkbox"/> spouse <input type="checkbox"/> brother/sister <input type="checkbox"/> parent <input type="checkbox"/> grandparent <input type="checkbox"/> stepparent <input type="checkbox"/> child <input type="checkbox"/> grandchild <input type="checkbox"/> stepchild <input type="checkbox"/> mother-in-law <input type="checkbox"/> father-in-law <input type="checkbox"/> son-in-law <input type="checkbox"/> daughter-in-law <input type="checkbox"/> legal guardian			
Requestor's Address			Name of Corporation (if appointed legal guardian)		
City	State	Zip Code	Requestor's Phone	Requestor's Email	

For Military/Overseas Citizens Only (may only be signed by the voter; may not be signed by a near relative/guardian)

Select one of the options below to qualify as a military or overseas voter.

Member of the Uniformed Services or Merchant Marine on active duty and currently absent from county of residence or an eligible spouse/dependent.

U.S. citizen residing outside the U.S. temporarily or indefinitely

Current Address (Address where you are currently stationed or living overseas.)	Transmit my ballot by: (Military/Overseas Voters Only) <input type="checkbox"/> Mail <input type="checkbox"/> Fax <input type="checkbox"/> Email
	Fax Number or Email Address

Signature of Voter (voter only) <u>X</u> [REDACTED]	Signature of Near Relative/Legal Guardian (if applicable) <u>X</u>
Date <u>8-14-18</u>	Date

STATE OF NORTH CAROLINA )  
 )  
COUNTY OF BLADEN )

Exhibit 7.1.2.2

AFFIDAVIT OF LUCY M. YOUNG

The undersigned, being first duly sworn, upon personal knowledge and belief, does say and depose as follows:

1. I am over the age of eighteen (18) years old, I am of sound mind and body, and I suffer no legal disabilities. If called as a witness, I can testify completely to the matters set forth herein.
2. I am a resident of Bladen County, North Carolina, and I am a registered voter of said county and state.
3. My contact information is as follows:

Address: 32 J & L Drive  
Lake Waccamaw N.C. 28450

Telephone: 910 645-4819

Email: \_\_\_\_\_

4. I allege and state as follows: I am Miss Lucy Young I  
Made my W&K Early in oct 2018, so I did  
receive an absentee Balloting but I did not ~~submit~~  
request for it.

Further affiant saith naught.

This the 29 day of November, 2018.

Lucy M. Young  
Signature

LUCY M. YOUNG  
Printed Name

[Handwritten Signature]  
Witness to Signature

Trelena C. Brown  
Printed Name

STATE OF NORTH CAROLINA

COUNTY OF BLADEN

I, \_\_\_\_\_, a Notary Public, do hereby certify that \_\_\_\_\_ personally appeared before me this day and acknowledged the due execution of the foregoing instrument for the purposes therein described.

Witness my hand and notarial seal, this the \_\_\_\_ day of November, 2018.

\_\_\_\_\_  
NOTARY PUBLIC

My Commission expires: \_\_\_\_\_


### Absentee Application and Certificate

Fraudulently or Falsely completing this form is a Class I felony under Chapter 163 of the N.C. General Statutes

The following people are PROHIBITED from signing the Witnesses' Certification:

For all voters: a candidate, UNLESS the candidate is the voter's near relative; For voters who are patients or residents of a hospital, clinic, nursing home, or adult care home: (1) an owner, manager, director, or employee of that facility; (2) an individual who holds any federal, State, or local elective office; and (3) an individual who holds office in a State, congressional district, county or precinct political party or organization, or who is a campaign manager or treasurer for any candidate or political party.

LUCY MITCHELL YOUNG  
 32 J AND L DR  
 WAKE WACCAMAW, NC 28450  
 DEM - BLADEN COUNTY



CIV-1055 Ballot: G002  
 LUCY MITCHELL YOUNG  
 PCT/MTD:P75/P75 Muni:  
 11/06/2018 - GENERAL

Board Approval Date \_\_\_\_\_

**Second Primary Request or Runoff Request**  
 In the event that a Second Primary (or Runoff Election) is called, I request that an absentee application and ballot be issued to me and mailed to me. (Check the box to receive eligible ballots.)

**Annual Request for Illness/Disability**  
 Due to continued or expected illness or disability, I request that this application be a request for absentee ballots for any other elections to be held this calendar year in which I am eligible to participate. (Check the box to receive eligible ballots.)

Signature of Voter (if applicable) \_\_\_\_\_

Address where application and ballots should be mailed \_\_\_\_\_

**Voter's Certification (Required)**  
 I am applying for an absentee ballot • I am a duly qualified voter, registered as an affiliate of the political party indicated on this application • All information represented on this application is correct • I am entitled to vote in this election • If I am an *Unaffiliated* voter voting in a primary election, I am voting in the party primary indicated on the attached label • If the party indicated is (UNA), I am voting a nonpartisan ballot.

I further certify that I marked the enclosed ballot (or it was marked for me according to my instructions) in the presence of:

two (2) witnesses who are at least 18 years of age and who are not disqualified by law to witness the casting of my absentee ballot (the witnesses must complete the **Option 1** of the *Witnesses' Certification*)

OR

a notary public (the notary must complete **Option 2** of the *Witnesses' Certification*)

X  
 Signature of Voter (Required) \_\_\_\_\_ Date \_\_\_\_\_

Name Correction (if applicable) \_\_\_\_\_

**Voter Assistant Certification (if applicable)**  
 I certify that: • The voter requested my assistance • I assisted the Voter by marking the ballot only according to the Voter's instruction; and/or I assisted the Voter in completing the *Absentee Application and Certificate* • I assisted the Voter only in the Voter's presence • I am the Voter's near relative or verifiable legal guardian, or I am providing assistance because a near relative or legal guardian is unavailable to assist the Voter.

\_\_\_\_\_  
 Name of Assistant Address of Assistant

X  
 Signature of Assistant \_\_\_\_\_ Date \_\_\_\_\_

**Witnesses' Certification**

**Option 1: Two (2) Witnesses**  
 (Required Unless a Notary Public is the Witness)

I certify that: • I am at least 18 years old • I am not disqualified from witnessing the ballot as described in the WARNING on the flap of this envelope • The Voter marked the enclosed ballot in my presence, or caused it to be marked in the Voter's presence according to his/her instruction • The Voter signed this *Absentee Application and Certificate*, or caused it to be signed • I respect the secrecy of the ballot and the Voter's privacy, unless I assisted the Voter at his/her request [complete *Voter Assistant Certification* section].

Witness #1	Witness #2
Signature (Required) _____	Signature (Required) _____
Street Address (Required) _____	Street Address (Required) _____
City, State and Zip (Required) _____	City, State and Zip (Required) _____
Date _____	Date _____

**Option 2: Notary Public as Witness**  
 (Required Unless Two Witnesses Provided)

I certify that: on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, the Voter \_\_\_\_\_ personally appeared before me, was positively identified, and in my presence, the Voter marked the enclosed ballot, or caused it to be marked in the Voter's presence according to his/her instruction • The Voter signed this *Absentee Application and Certificate*, caused it to be signed • I am at least 18 years old • I am not disqualified from witnessing the ballot described in the WARNING on the flap of this envelope • I respected the secrecy of the ballot and the privacy of the Voter, unless I assisted the Voter at his/her request [complete *Voter Assistant Certification* section].

NOTE: A notary may not charge any fee for witnessing and affixing a notarial seal to an absentee ballot application or certificate. [G.S. § 108-3]

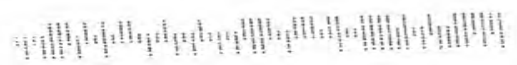
STATE OF \_\_\_\_\_

COUNTY OF \_\_\_\_\_

Notary Public \_\_\_\_\_ Commission Expiration Date \_\_\_\_\_



Bladen County  
301 S. Cypress  
PO Box 512  
Elizabethtown, NC 28337-0512



**OFFICIAL ABSENTEE BALLOTING MATERIAL - FIRST CLASS MAIL**

**TO:**  
LUCY MITCHELL YOUNG  
32 J AND L DR  
LAKE WACCAMAW, NC 28450

**AFFIDAVIT OF MELISSA WILLIAMS**

North Carolina

County of Bladen

Melissa Williams, appearing before the undersigned notary and being duly sworn, says that:

I, Melissa Williams, do declare the following under penalty of perjury:

1. I am over the age of 18 and a resident of the state of North Carolina. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth herein.
3. I reside at 10987 S College St # 2, Clarkton, North Carolina. I am a registered North Carolina voter at this address and was eligible to vote in the November 6, 2018 general election.
4. I requested an absentee ballot for the 2018 general election.
5. After I received my absentee ballot, a woman came to my residence.
6. I did not know this woman personally.
7. This woman offered to deliver my absentee ballot and absentee ballot envelope to the county elections officials.
8. I gave my absentee ballot and absentee ballot envelope to this woman to deliver to the county elections officials.
9. The absentee ballot was not sealed inside the absentee ballot envelope when I gave the absentee ballot and absentee ballot envelope to the woman.
10. I do not know whether my absentee ballot and absentee ballot envelope were submitted to the proper county officials.
11. I filled out the ballot myself

12. \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

[Signature Page to Follow]

I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Name: Melissa Williams

Signature: Melissa Williams

Date: 12/18/2018

Sworn to (or affirmed) and subscribed before me this the 19<sup>th</sup> day of December, 2018.



Sandra Whitley  
Notary Public

Sandra Whitley  
Notary's printed or typed name

My commission expires 03-12-~~2~~, 2023

**AFFIDAVIT OF MELODY COVINGTON**

North Carolina

County of Bladen

Melody Covington, appearing before the undersigned notary and being duly sworn, says that:

I, Melody Covington, do declare the following under penalty of perjury:

1. I am over the age of 18 and a resident of the state of North Carolina. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth herein.
3. I reside at 303 Pecan Street, Apt. 11B, Bladenboro, North Carolina. I am a registered North Carolina voter at this address and was eligible to vote in the November 6, 2018 general election.
4. I requested an absentee ballot for the 2018 general election.
5. After I received my absentee ballot, a woman came to my residence.
6. This woman offered to deliver my absentee ballot to the county elections officials.
7. I did not know this woman personally.
8. I refused to give my absentee ballot to this woman.
9. After this incident, I decided to go vote in-person on Election Day instead of submitting my absentee ballot.

10. \_\_\_\_\_

11. \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

[Signature Page to Follow]

I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Name: Melody Covington

Signature: Melody Covington

Date: 12-19-18

Sworn to (or affirmed) and subscribed before me this the 19<sup>th</sup> day of December, 2018.

Sandra Whitley  
Notary Public

Sandra Whitley  
Notary's printed or typed name



My commission expires March 12, 2023

**AFFIDAVIT OF NICHOLE M. NIMMONS**

North Carolina

County of Bladen

Nichole M. Nimmons, appearing before the undersigned notary and being duly sworn, says that:

I, Nichole M. Nimmons, do declare the following under penalty of perjury:

1. I am over the age of 18 and a resident of the state of North Carolina. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth herein.
3. I reside at 10898 S. College Street, #42, Clarkton, North Carolina. I am a registered North Carolina voter at this address and was eligible to vote in the November 6, 2018 general election.
4. I have been told that my name is on a public records list of voters who requested an absentee ballot for the 2018 general election.
5. I never requested an absentee ballot for the 2018 general election and never received an absentee ballot for the general election.
6. I do not know why my name is on a list of voters who requested an absentee ballot for the 2018 general election.
7. I voted in-person on Election Day for the 2018 general election.

8. \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
9. \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

[Signature Page to Follow]

I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Name: Nichole M. Nimmons

Signature: Nichole Nimmons

Date: Dec 20, 2018

Sworn to (or affirmed) and subscribed before me this the 20<sup>th</sup> day of December, 2018.



Sandra Whitley  
Notary Public

Sandra Whitley  
Notary's printed or typed name

My commission expires March 12, 2023

**AFFIDAVIT OF STEPHANIE E. PAGE**

North Carolina

County of Robeson

Stephanie E. Page, appearing before the undersigned notary and being duly sworn, says that:

I, Stephanie E. Page, do declare the following under penalty of perjury:

1. I am over the age of 18 and a resident of the state of North Carolina. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth herein.
3. I reside at 2112 Turner Place, Lumberton, North Carolina. I am a registered North Carolina voter at this address and was eligible to vote in the November 6, 2018 general election.
4. I requested an absentee ballot for the 2018 general election.
5. When I received my absentee ballot, I filled out the ballot and sealed the ballot inside the absentee ballot envelope.
6. After I sealed my absentee ballot envelope, a man came to my residence and offered to deliver my absentee ballot envelope to the county elections officials.
7. I did not know this man personally.
8. I gave my absentee ballot envelope to this man to deliver to the county elections officials.
9. I do not know whether this man delivered my absentee ballot envelope to the county elections officials.

10. \_\_\_\_\_

\_\_\_\_\_

11. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

[Signature Page to Follow]



I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Name: Stephanie E. Page

Signature: Stephie Page

Date: 12/18/18

Sworn to (or affirmed) and subscribed before me this the 18<sup>th</sup> day of December, 20 18.



Sharon Hunt  
Notary Public

Sharon Hunt  
Notary's printed or typed name

My commission expires 2/22, 20 19.

STATE OF NORTH CAROLINA )  
 )  
COUNTY OF BLADEN )

AFFIDAVIT OF AGNES WILLIS

The undersigned, being first duly sworn, upon personal knowledge and belief, does say and depose as follows:

- 1. I am over the age of eighteen (18) years old, I am of sound mind and body, and I suffer no legal disabilities. If called as a witness, I can testify completely to the matters set forth herein.
- 2. I am a resident of Bladen County, North Carolina, and I am a registered voter of said county and state.
- 3. My contact information is as follows:

Address: 261 White Plains Church Road  
Clarkton, NC 28433

Telephone: 910-316-8404

Email: agneswillis267@yahoo.com

4. I allege and state as follows: On Saturday, 11/3/18, the last day of early voting, the "tape" showing election results at the one-stop polling site was run after the polls closed, and was viewed by officials at the one-stop site who were not Judges. It is my understanding that this was improper.

Also, after the election, as part of my duties as an assistant, I fed ballots into the vote tabulation machines. The Absentee mail-in ballots were distinctive due to the Folding creases and wear and tear present on the ballots, as well as coding written on the ballots. I noticed a very large number of ballots from the Bethel precinct.

Further affiant saith naught.

This the 29<sup>th</sup> day of November, 2018.

Agnes Willis  
Signature

Agnes Willis  
Printed Name

MM  
Witness to Signature

Matthew J. Dixon  
Printed Name



STATE OF NORTH CAROLINA

COUNTY OF BLADEN

I, Sandra Whitley, a Notary Public, do hereby certify that Agnes Willis personally appeared before me this day and acknowledged the due execution of the foregoing instrument for the purposes therein described.

Witness my hand and notarial seal, this the 29<sup>th</sup> day of November, 2018.

Sandra Whitley  
NOTARY PUBLIC

My Commission expires: 03-12-2023

**AFFIDAVIT OF BEN SNYDER**

North Carolina

County of Bladen

Ben Snyder, appearing before the undersigned notary and being duly sworn, says that:

I, Ben Snyder, do declare the following under penalty of perjury:

1. I am over the age of 18 and a resident of the state of North Carolina. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth herein.
3. I am the current Chairman of the Bladen County Democratic Party.
4. Following the November 6, 2018, election, I obtained information regarding a new tactic that Leslie McCrae Dowless, Jr., was using in the 2018 election cycle; namely, intentionally losing voters' absentee ballots. This information was conveyed to me by Bladen County Board of Elections member Bobby Ludlum.
5. According to Mr. Ludlum, Mr. Dowless described this new tactic to Ms. Cynthia Shaw, Bladen County Board of Elections Director, at the Board of Elections, on some date prior to my conversation with Mr. Ludlum. While the exact language of each party is not certain, I understand the substance of this conversation was generally as follows:

Dowless: "Well, I have added a new trick"

Shaw: "What is it?"

Dowless: "I am throwing ballots into the trash."

[Signature Page to Follow]

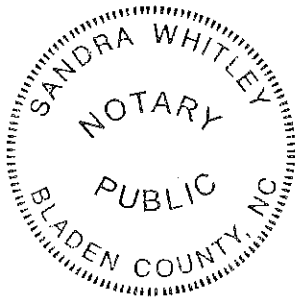
I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Name: Ben Snyder

Signature: Benjamin M. Snyder

Date: 12-19-18

Sworn to (or affirmed) and subscribed before me this the 19<sup>th</sup> day of December, 2018.



Sandra Whitley  
Notary Public

Sandra Whitley  
Notary's printed or typed name

My commission expires March 12, 2023.

STATE OF NORTH CAROLINA )  
 )  
COUNTY OF BLADEN )

AFFIDAVIT OF DWIGHT SHEPPARD

The undersigned, being first duly sworn, upon personal knowledge and belief, does say and depose as follows:

- 1. I am over the age of eighteen (18) years old, I am of sound mind and body, and I suffer no legal disabilities. If called as a witness, I can testify completely to the matters set forth herein.
- 2. I am a resident of Bladen County, North Carolina, and I am a registered voter of said county and state.
- 3. My contact information is as follows:

Address: 20134 NC Hwy 87 W  
St. Pauls, NC 28384

Telephone: 910-813-9729

Email: sheppadl@embarqmail.com

- 4. I allege and state as follows:

It is common knowledge that Leslie McCrae Dowless, Jr., was working for the Mark Harris Campaign in the Primary Election and General Election of 2018.

On election day, November 6, 2018, I was outside the Bethel Precinct polling site in Dublin, NC. I overheard a group of people talking, and someone said that Leslie McCrae Dowless, Jr., would receive a bonus in the amount of \$40,000.00 from the Mark Harris campaign if Mark Harris won the election over Dan McCready.

Also on election day, November 6, 2018, outside the Hollow Precinct polling site in Tarheel, NC, I overheard Tommy White of Bethel precinct say that he had received an absentee ballot in the mail which he had not ordered.

Further affiant saith naught.

This the 29<sup>th</sup> day of November, 2018.

[Handwritten Signature]  
Signature

Dwight Sheppard  
Printed Name

[Handwritten Signature]  
Witness to Signature

Matthew J. Dixon  
Printed Name



STATE OF NORTH CAROLINA

COUNTY OF BLADEN

I, Sandra Whitley, a Notary Public, do hereby certify that Agnes Willis personally appeared before me this day and acknowledged the due execution of the foregoing instrument for the purposes therein described.

Witness my hand and notarial seal, this the 29<sup>th</sup> day of November, 2018.

[Handwritten Signature]  
NOTARY PUBLIC

My Commission expires: 03-12-2023

The undersigned, being first duly sworn, upon personal knowledge and belief, does say and depose as follows:

1. I am over the age of eighteen (18) years old, I am of sound mind and body, and I suffer no legal disabilities. If called as a witness, I can testify completely to the matters set forth herein.
2. I am a resident of Cumberland County, North Carolina, and I am a registered voter of said county and state.
3. My contact information is as follows:

Address: 904 Circle Point Ct, Fayetteville, N.C.  
28306

Telephone: (910) 818-2989

Email: hermandunn@aol.com.

4. I allege and state as follows:

ON Wednesday April 25, 2018 at approximately  
2:30PM, I was checking Maps Creek School,  
on early voting, while talking with my poll  
worker I saw McRae Dowless, who I knew  
from the Bladen County Elections,  
I talked with him + his brother when  
McRae said he was working for Jim McVickers  
from Bladen County + Mark Harris from  
Charlotte. That he was doing Absentee  
for both AS he had done in the past in  
Bladen County elections  
(ReAR)



He also stated that you know I  
don't take checks. They have to  
PAY ME ~~IN~~ CASH.

He also said he had over 80 people  
working for him between Combeland Co  
& Charlotte in the Harris race.

Further affiant saith naught.

This the \_\_\_\_ day of November, 2018.

Herman W. Dunn  
Signature

Herman W. Dunn  
Printed Name

Prentis Benston  
Witness to Signature

Prentis Benston  
Printed Name

STATE OF NORTH CAROLINA

COUNTY OF \_\_\_\_\_

I, \_\_\_\_\_, a Notary Public, do hereby certify that Herman Dunn personally appeared before me this day and acknowledged the due execution of the foregoing instrument for the purposes therein described.

Witness my hand and notarial seal, this the \_\_\_\_ day of November, 2018.

\_\_\_\_\_  
NOTARY PUBLIC

My Commission expires: \_\_\_\_\_



MARK  
HARRIS



**AFFIDAVIT OF JENS LUTZ**

North Carolina

County of Bladen

Jens Lutz, appearing before the undersigned notary and being duly sworn, says that:

I, Jens Lutz, do declare the following under penalty of perjury:

1. I am over the age of 18 and a resident of the state of North Carolina. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth herein.
3. I am a former member of the Bladen County Board of Elections (the "Board"). I resigned from the Board on December 8, 2018.
4. Prior to resigning from the Board, I learned many facts that made me question the security and integrity of Bladen County elections.
5. At all times relevant herein, Leslie McCrae Dowless Jr., also known as McCrae Dowless, has had a close relationship with Cynthia Shaw, the Bladen County Board of Elections Director, and Gina Ward, the Bladen County Board of Elections Deputy Director.
6. It is my understanding that during prior election years, Board staff allowed Mr. Dowless to take and copy unredacted absentee ballot request forms, which include social security numbers, driver's license numbers, state ID numbers, and signatures. Upon information and belief, this information gave Mr. Dowless the ability to request absentee ballots for anyone who has ever voted by absentee ballot by mail in the recent past.
7. In the course of our supervisory duties, we discovered that several forged absentee ballot request forms were submitted for the 2018 general election, including one request form on behalf of a deceased person, another submitted on behalf of a relative of fellow Board member Bobby Ludlum, and another submitted on behalf of a relative of Ms. Shaw. When I asked Ms. Shaw whether she had provided the State Board of Elections with the absentee ballot request form that had been submitted on behalf of the deceased individual, she informed me that she had not and that she had instead contacted Mr. Dowless and talked to him about it. I had previously provided a copy of the request form and a copy of the death certificate to the State Board of Elections.
8. It is my understanding that Open Records Laws allow citizens to receive information from County Boards of Election regarding when absentee ballots would be sent to specific voters. Mr. Dowless abused this provision in the law by regularly receiving such information (contained in a report titled "Absentee Ballot Voter Correspondence Report") from Board staff, allowing Mr. Dowless to send his workers to those voters right after the ballots arrived. Because the race of the voter is included on this report, Mr. Dowless could have used it to target African American voters. On one occasion in the fall of 2018, I witnessed Mr. Dowless pressuring Board staff to provide this information to him. I confronted Mr. Dowless and told him that the Board office was closed. He responded

angrily, and my fellow Board of Elections member, Mr. Ludlum, went outside to explain the situation, after which he left the Board of Elections.

9. It is my understanding that Ms. Shaw had the ability to access the mail-in absentee ballot results prior to Election Day. She could do this by taking the thumb drive from the mail-in absentee ballot voting machine and inserting it into a computer that could read the results. She did not need to print a voting machine tape to get the results.
10. I know of one person who claims to have overheard Mr. Dowless bragging about pre-election candidate vote totals to multiple people after one-stop in-person, early voting ended, indicating that he was aware of the one-stop early voting totals, and that the candidate or candidates he supported were in the lead.
11. The Board office security is lax. A key to the absentee ballot room is kept on a wall in the Board office. Accordingly, anyone with access to the Board office can easily access the absentee ballot room. Absentee ballots were kept in zipped bags in the absentee ballot room.
12. The Board does not see the absentee ballots until the Board staff presents the ballots to the Board. When the Board staff receives absentee ballots, the Board staff codes the ballots (using the absentee ballot envelope bar code) into the system and creates an initial report. The absentee ballots are then presented to the Board. In multiple instances, there were discrepancies between the initial report and the actual the number of ballots presented to the Board.
13. I was informed that two voters, Emma Shipman and Datesha Montgomery, had been visited by a woman (later identified as Lisa Britt) who collected their absentee ballots. I checked Board records to confirm whether the absentee ballots had been returned to the Board; they had not been. I then met with Ms. Shipman and Ms. Montgomery, separately, and obtained statements regarding their experiences.
14. Several days after Ms. Shipman's statement had been received by Ms. Shaw, I was told by Ms. Shipman that the same woman who had initially collected her ballot had brought her ballot back to her, sealed in the ballot envelope and signed by two witnesses.

[Signature Page to Follow]

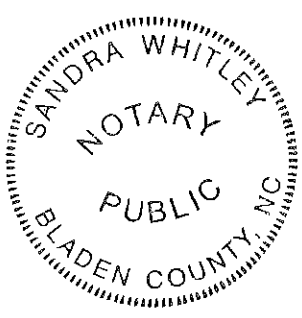
I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Name: Jens Lutz

Signature: [Handwritten Signature]

Date: 12/19/2018

Sworn to (or affirmed) and subscribed before me this the 19<sup>th</sup> day of December, 2018.



[Handwritten Signature]  
Notary Public

Sandra Whitley  
Notary's printed or typed name

My commission expires 3-12, 2023

Affidavit of Kenneth Simmons

STATE OF NORTH CAROLINA  
COUNTY OF BLADEN

The Undersigned, Kenneth Simmons, being duly sworn deposes and says:

- 1. I am over the age of 18 and a resident of the state of North Carolina. I have personal knowledge of the facts herein, and, if called as a witness, can testify completely thereto.
- 2. I suffer no legal disabilities and have personal knowledge of the facts set forth below.
- 3. During the campaign, my wife and I were working putting out signs for a local candidate. While we were in Dublin attending a meeting of Republicans, we spoke with McRae Dowless. During the conversation, we noticed that Mr. Dowless had in his possession a large number of absentee ballots. I questioned his reason for having that many ballots. He stated that he had over 800 ballots in his possession. I asked him why he had not turned them in. He sated you don't do that until the last day because the opposition would know how many votes they had to make up. My concern was that these ballots were not going to be turned in.

I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Executed this 11 day of December 2018

[Signature]  
Kenneth Simmons

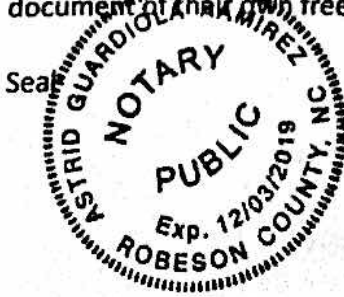
[Signature]  
Witness

State of NC

County of Robeson

Subscribed and sworn before me, I Astid Guardiola Ramirez. A Notary Public in and for the County and State above, do hereby declare The Affiant,

Kenneth Simmons did appear personally before me and furnish to me adequate identification of proving their identity and stated that (he) did sign this document of their own free will on this 11 day of December 2018



[Signature]  
Notary Public

My Commission expires: 12-03-2019



Affidavit of Dr. Stephen Ansolabehere, Ph. D.

Report on Absentee Ballots in the 2018 North Carolina Congressional District 9  
General Election

December 21, 2018

**Statement of Inquiry**

1. I have been asked to examine patterns of absentee voting in the state of North Carolina in the 2018 General Election, especially in Bladen and Robeson counties. Specifically, I have been asked whether these patterns in Bladen and Robeson counties are anomalous within Congressional District (CD) 9 and within the state of North Carolina.

**Summary of Findings**

2. First, the rates at which voters who requested absentee mail ballots in Bladen<sup>1</sup> and Robeson counties did not return their absentee ballots are extreme statistical outliers. For example, the rate at which voters did not return their absentee mail ballots in Bladen county is 2.5 times the rate elsewhere in CD 9 and elsewhere in the state of North Carolina. Similarly, the rate at which voters did not return their absentee mail ballots in Robeson County is three times the rate elsewhere in CD 9 and elsewhere in the state of North Carolina. The rates at which voters did not return their absentee ballots and did not otherwise vote in these counties is also much higher than elsewhere in CD 9 and North Carolina. Statistical tests show that these deviations are extremely unlikely to have arisen by chance.
3. These high non-return rates are not explained by the presence of new voters who may be unfamiliar with absentee voting or less likely to participate. Rather, the non-return rates for both frequent and occasional voters are much higher than similar voters elsewhere in CD 9 and North Carolina. For example, only 9.7% of frequent voters (i.e. voters who voted in more than four of the last six elections) elsewhere in CD 9 did not return their absentee ballots or vote; by contrast, in Bladen and Robeson Counties, 41.7% of frequent voters did not return their absentee ballots or otherwise attempt to vote.
4. Nor are these high non-return rates explained by other factors, such as the demographic or political composition of these counties. Rather, the

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<sup>1</sup> Bladen County is split between CD 9 and CD 7. Throughout my report, when I refer to "Bladen County," I am referring to the portion of Bladen County in CD 9 unless I state otherwise.

non-return rate for members of each of the different political parties and each different racial group are much higher in Robeson and Bladen counties than they are for these same groups elsewhere in CD 9 and the rest of the state of North Carolina.

5. Second, the vote counts among absentee mail ballots received and accepted are anomalous. Elsewhere in CD 9 and throughout the state of North Carolina, it appears that Democratic and Republican congressional candidates typically receive a total number of absentee mail ballot votes that corresponds to the total number of absentee ballots submitted by registrants of their party, plus some number of absentee votes of unaffiliated registrants. For example, elsewhere in CD 9, excluding Bladen and Robeson counties, Dan McCready's vote totals were 22.4 points higher than the share of Democratic registrants among mail ballots cast, and Mark Harris's vote totals were 9.0 points higher than the share of Republican registrants.
6. The absentee vote counts in Bladen and Robeson counties for the Democratic and Republican candidates for CD 9 differ from the rates of absentee mail ballots submitted by Democratic and Republican registrants. The differences break markedly from the rates of absentee ballots of Democrat and Republican registrants and votes for Democratic and Republican candidates. The differences do not reflect the pattern exhibited elsewhere in CD 9 or elsewhere in the state of North Carolina.
7. In Bladen and Robeson counties, Mark Harris's absentee mail vote totals significantly outperformed the number of Republican registrants who submitted absentee mail ballots. In Bladen County, Harris's vote totals were 41 points higher than the percentage of Republican registrants who cast absentee mail ballots; in Robeson County, Harris's vote totals were 23 points higher. By contrast, McCready's absentee mail vote totals were either lower than or about equal to the number of Democratic registrants who submitted absentee ballots in Bladen and Robeson counties.
8. In short, absentee mail voting patterns in Bladen and Robeson counties differed significantly from the remainder of CD 9 and from elsewhere in the State of North Carolina in two ways. First, there were exceedingly high rates at which absentee mail ballots were not returned in these counties, and with which people neither returned an absentee mail ballot, nor managed to vote in some other way. Second, among the ballots that were actually returned in these counties, the patterns of absentee mail votes deviated greatly from the absentee mail vote patterns observed elsewhere in the state. Mark Harris greatly overperformed in these two counties when compared with what one might have expected based on patterns elsewhere in CD 9 and throughout the state, and Dan McCready

greatly underperformed given the patterns observed elsewhere in CD 9 and throughout the state.

### Qualifications

9. I am the Frank G. Thompson Professor of Government in the Department of Government at Harvard University in Cambridge, Massachusetts. Formerly, I was an Assistant Professor at the University of California, Los Angeles, and I was Professor of Political Science at the Massachusetts Institute of Technology, where I held the Elting R. Morison Chair and served as Associate Head of the Department of Political Science. I am the Principal Investigator of the Cooperative Congressional Election Study (CCES), a survey research consortium of over 250 faculty and student researchers at more than 50 universities, directed the Caltech/MIT Voting Technology Project from its inception in 2000 through 2004, and served on the Board of Overseers of the American National Election Study from 1999 to 2013. I am a consultant to CBS News' Election Night Decision Desk. I am a member of the American Academy of Arts and Sciences (inducted in 2007). My curriculum vitae is attached to this report.
10. I have testified before the U.S. Senate Committee on Rules, the U.S. Senate Committee on Commerce, the U.S. House Committee on Science, Space, and Technology, the U.S. House Committee on House Administration, and the Congressional Black Caucus on matters of election administration in the United States. I filed an amicus brief with Professors Nathaniel Persily and Charles Stewart on behalf of neither party to the U.S. Supreme Court in the case of *Northwest Austin Municipal Utility District Number One v. Holder*, 557 U.S. 193 (2009) and an amicus brief with Professor Nathaniel Persily and others in the case of *Evenwel v. Abbott* 578 US \_\_\_ (2015). I have worked as a consultant to the Brennan Center in the case of *McConnell v. FEC*, 540 U.S. 93 (2003). I have served as a testifying expert for the Gonzales intervenors in *State of Texas v. United States* before the U.S. District Court in the District of Columbia (No. 1:11-cv-01303); the Rodriguez plaintiffs in *Perez v. Perry*, before the U. S. District Court in the Western District of Texas (No. 5:11-cv-00360), for the San Antonio Water District intervenor in *LULAC v. Edwards Aquifer Authority* in the U.S. District Court for the Western District of Texas, San Antonio Division (No. 5:12cv620-OLG,) for the Department of Justice in *State of Texas v. Holder*, before the U.S. District Court in the District of Columbia (No. 1:12-cv-00128); for the Guy plaintiffs in *Guy v. Miller* in U.S. District Court for Nevada (No. 11-OC-00042-1B); for the Florida Democratic Party in *In re Senate Joint Resolution of Legislative Apportionment* in the Florida Supreme Court (Nos. 2012-CA-412, 2012-CA-490); for the Romo plaintiffs in *Romo v. Detzner* in the Circuit Court of the Second Judicial Circuit in Florida (No. 2012 CA 412); for the Department of Justice in *Veasey v.*

*Perry*, before the U.S. District Court for the Southern District of Texas, Corpus Christi Division (No. 2:13cv00193); for the Harris plaintiffs in *Harris v. McCrory* in the U. S. District Court for the Middle District of North Carolina (No. 1:2013cv00949); for the Bethune-Hill plaintiffs in *Bethune-Hill v. Virginia State Board of Elections* in the U.S. District Court for the Eastern District of Virginia (No. 3: 2014cv00852); and for the Fish plaintiffs in *Fish v. Kobach* in the U.S. District Court for the District of Kansas (No. 2:16-cv-02105-JAR).

11. My areas of expertise include American government, with particular expertise in electoral politics, representation, and public opinion, as well as statistical methods in social sciences and survey research methods. I have authored numerous scholarly works on voting behavior and elections, the application of statistical methods in social sciences, legislative politics and representation, and distributive politics. This scholarship includes articles in such academic journals as the Journal of the Royal Statistical Society, American Political Science Review, American Economic Review, the American Journal of Political Science, Legislative Studies Quarterly, Quarterly Journal of Political Science, Electoral Studies, and Political Analysis. I have published articles on issues of election law in the Harvard Law Review, Texas Law Review, Columbia Law Review, New York University Annual Survey of Law, and Election Law Journal, for which I am a member of the editorial board. I have coauthored three scholarly books on electoral politics in the United States, The End of Inequality: Baker v. Carr and the Transformation of American Politics, Going Negative: How Political Advertising Shrinks and Polarizes the Electorate, and The Media Game: American Politics in the Media Age. I am coauthor with Benjamin Ginsberg, and Ken Shepsle of American Government: Power and Purpose. My curriculum vita with publications list is attached to this report.

### **Data and Sources**

12. I relied on databases accessed through the website of the North Carolina State Board of Elections. Three primary databases in this analysis are:
  - Database of Absentee requests in the November 6, 2018 election. This is the database absentee\_20181106.csv.
  - Database of Vote History of Records on the North Carolina state vote files. This is the file ncvhis\_Statewide.txt.
  - Database of election results for the November 6, 2018 election. This is the file results\_pct\_20181106.txt.
13. The North Carolina State Board of Elections and Ethics Enforcement posted a document titled Exhibit 4.2.5.1.1.1, with a link to a dataset of

unreturned ballots in CD 9. These data are compiled in the database CIV\_ABS\_CONG\_09\_BALLOT\_NOT\_RETURNED\_EXPT\_PUBLIC\_20181204.csv. Analyses of these data showed somewhat higher numbers of cases without a returned ballot than are evident in absentee\_20181106. However, these data do not appear to be a complete accounting of all absentee requests. For example, they only cover the counties in CD 9.

14. I merged the data in the file CIV\_ABS\_CONG\_09\_BALLOT\_NOT\_RETURNED\_EXPT\_PUBLIC\_20181204.csv into the file absentee\_20181106. I discovered a small number of discrepancies in the number of people who did were indicated as not having returned an absentee mail ballot in CD 9. These discrepancies were on the order of a couple of dozen cases, and not sufficient to alter substantively any of the results or conclusions drawn with the analysis of absentee\_20181106. I discuss the data from Exhibit 4.2.5.1.1.1 in my appendix.

## Results

15. The absentee mail ballot process has six steps.<sup>2</sup>
16. First, a registered voter or a near relative requests that an absentee mail ballot be sent. The form must be signed by the voter or a near relative, and the requestor must provide the address where the ballot is to be sent.
17. Second, the County Election Office verifies the request and sends the voter a mail ballot.
18. Third, after receiving the ballot from the County Election Office, the voter fills out the ballot in the presence of two witnesses (or one if the witness is a notary public). The voter must seal the ballot in the return envelope and, then, complete and sign the Absentee Application and Certificate on the back of the envelope. The witness or witnesses also sign the envelope.
19. Fourth, the registrant returns the absentee ballot to the County Election Office. Under North Carolina law, to be counted an absentee ballot must be (i) delivered in-person to the County Election Office no later than 5:00 p.m. on Election Day, or (ii) postmarked no later than Election Day and received by the County Election Office no later than 3 days after Election Day.<sup>3</sup>

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<sup>2</sup> The website of the North Carolina State Board of Elections provides a more detailed discussion of these steps. <https://www.ncsbe.gov/absentee-voting-mail>.

<sup>3</sup> For the 2018 general election, due to Hurricane Florence, the State Board of Elections ordered all hurricane-affected counties, including Bladen and Robeson, to

20. Fifth, the County Election Office receives the ballots, records the receipt, and determines whether the ballot is valid (e.g., was signed and witnessed).
21. Sixth, the County Election Office determines how each individual voted, resolves all instances where an individual may have voted twice (say, absentee mail and in-person on election day) and counts all votes for offices and ballot measures. If an individual sent a mail ballot and later voted at the polling places in-person, curbside, or one-stop, the mail ballot is considered invalid and the other method of voting is accepted.
22. Following the November 6, 2018 general election in North Carolina, there were reports of irregularities in absentee mail ballots in Bladen, Columbus, and Robeson Counties.<sup>4</sup> At least two types of activities are alleged to have occurred.
23. There are allegations that people collected or intercepted marked absentee ballots and did not return them. That would interfere with Step 4. If this type of activity was occurring and widespread in a particular area, we would expect to see unusually large numbers of non-returned ballots in that area.
24. There are also allegations that people collected absentee mail ballots from the individuals who requested them, and, then, completed or altered the ballots to benefit one or more candidates, and returned them to the county election office. This type activity would affect Steps 3 and 6 of the process. If this type of activity was occurring and widespread, we would expect to see unusual deviations of the partisan division of the absentee

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count all absentee ballots postmarked no later than Election Day and received by the County Election Office no later than 9 days after Election Day.

<sup>4</sup> Greg Re, "Dems threaten not to seat GOP House winner amid ballot harvesting accusations in North Carolina" <https://www.foxnews.com/politics/alleged-ballot-harvesting-in-north-carolina-house-race-may-wipe-out-gop-win>; Matt Volz "Disputed House race puts spotlight on 'ballot harvesting.'" Washington Post, December 6, 2018, [https://www.washingtonpost.com/national/north-carolina-race-shines-light-on-ballot-harvesting/2018/12/06/919d1a8c-f996-11e8-8642-c9718a256cbd\\_story.html?utm\\_term=.3b1a1484553f](https://www.washingtonpost.com/national/north-carolina-race-shines-light-on-ballot-harvesting/2018/12/06/919d1a8c-f996-11e8-8642-c9718a256cbd_story.html?utm_term=.3b1a1484553f).

Ann McAdams, "NC election fraud: Concerning number of absentee ballots not returned in Columbus CO." WECT News, December 12, 2018 <http://www.wect.com/2018/12/12/concerning-number-absentee-ballots-not-returned-columbus-co/>.

vote from the partisan division of the absentee ballot requests. The latter would emerge because voters have a strong tendency to vote in line with their party registration and party identification. This type of activity, then, could result in unusually large numbers of non-returned absentee ballots and discrepancies between the partisanship of the absentee mail registrations and the party division of the absentee mail vote.

25. Parts A, B, C and D of this Section of my report examine the rates of non-returned ballots. Section E examines the discrepancy between requests and votes in absentee mail ballots that were returned and accepted.

## **A. Requests for and Return of Absentee Mail Ballots in the State of North Carolina**

### **A.1. Statewide**

26. There are at least four different categories of data in the NCSBE Voter File relevant to this inquiry.
27. Requests for Absentee Mail Ballots (“Requests”). This is the number of absentee mail ballots requests received by county elections departments.
28. Voters who Requested an Absentee Mail Ballot (“Requestors”). This is the number of individual voters who submitted at least one request for an absentee mail ballot (as indicated by unique NCIDs). One individual may submit multiple requests for an absentee mail ballot; as a result, there are more requests than there are requestors.
29. Voters who Requested an Absentee Mail Ballot but Did Not Return the Absentee Mail Ballot (“Non-Mailing Requestors”). These are the voters who requested an absentee mail ballot but did not return it. Because an individual who does not return their absentee ballot can vote another way, such as through a one-stop early voting site or at the polling place on election day, this group includes both people who voted and people who did not vote.
30. Voters who Requested an Absentee Mail Ballot, Did Not Return the Absentee Mail Ballot, and Did Not Otherwise Vote (“Non-Voting Requestors”). These are the voters who requested an absentee mail ballot, did not return it, and did not otherwise vote during one-stop early voting or at the polling place on election day. I used the vote history data from the state of North Carolina to determine whether and how each individual in the absentee voter file ultimately voted.

31. Across the state of North Carolina, counties received 137,234 Requests for absentee mail ballots in the 2018 general election,<sup>5</sup> and there were 132,188 Requestors.<sup>6</sup>

TABLE 1. REQUESTORS' VOTING OUTCOMES AND OUTCOMES OF REQUESTORS' MAIL BALLOTS IN 2018 GENERAL ELECTION (ALL REQUESTORS STATEWIDE)					
		Outcomes of Requestors' Mail Ballots			
	Requestors	Requestors whose Mail Ballot was Returned and Accepted	Requestors whose Mail Ballot was Returned but Not Accepted	Requestors whose Mail Ballot was Not Returned	Requestors whose Mail Ballot was Never Sent by County
<u>Requestors' Voting Outcomes</u>					
Requestors who Did Not Vote in Election (any method - mail, early, election day)	19,967	13	5,301	14,527 (10.9%) ["Non-Voting Requestors"]	126
Requestors who Voted in Election (any method - mail, early, election day)	112,221 (84.8%)	107,541	478	4,167	35
TOTAL	132,188	107,554	5,779	18,694 (14.1%) ["Non-Mailing Requestors"]	161

32. In general, a large majority of Requestors in North Carolina in 2018 succeeded in voting, either using their mail ballot or through some other

<sup>5</sup> This figure equals the number of records (or rows) in the file absentee\_20181106.csv for which the field ballot\_req\_type equals MAIL.

<sup>6</sup> The file absentee\_20181106.csv contains 15,066 records for which an individual (unique NCID) tried to obtain an absentee mail ballot at least once.



means. In total, 112,221 Requestors (or 85 percent of the 132,188 Requestors) eventually voted in the North Carolina general election in 2018. See Table 1.

33. Out of the 132,188 Requestors statewide, there were 18,694 Non-Returning Requestors (individuals who did not return their absentee mail ballot). Of these Non-Returning Requestors, 4,167 attempted to vote some other way. Hence, 14,527 individuals (or 10.9 percent of the 132,188 requestors) were Non-Voting Requestors (who did not return a mail ballot and did not vote another way). See Table 1.
34. Finally, 5,779 Requestors statewide returned an absentee mail ballot but the election office did not accept their ballots. This amounts to 5 percent of Requestors who returned their mail ballot. A voter's mail ballot might be rejected for a variety of reasons. The most common reason listed in the data are "VOTER SIGNATURE MISSING," "WITNESS INFO INCOMPLETE," and "SPOILED." These cases can be further divided into those individuals who managed to vote some other way and those who did not.
35. The rest of my report primarily focuses on Non-Voting Requestors: those who requested and were sent an absentee mail ballot, did not return their absentee ballot, and did not vote in any other way.

## **A.2. Congressional District 9**

36. To begin with, contrast the rates of non-returned ballots in CD 9 with the rest of the state. CD 9 has a much higher rate of Non-Mailing Requestors and Non-Voting Requestors than the rest of the state of North Carolina. As will become clear, this deviation is driven primarily by the results in two counties, Bladen and Robeson.
37. In CD 9, there were 17,005 requests for absentee mail ballots. Resolving duplicates, there were 16,299 Requestors.
38. CD 9 had the highest rate of Non-Mailing Requestors in the state of North Carolina in the 2018 General Election.
39. Of the 16,299 Requestors in CD 9, 3,397 (21 percent) were Non-Mailing Requestors. The rates of Non-Mailing Requestors in the other 12 CDs ranged from 11 percent (in CDs 5 and 11) to 16 percent (in CDs 1 and 8). The rate of Non-Mailing Requestors in CD 9 is 50 percent higher than the rate of absentee mail ballots across all CDs in 2018. The overall rate of Non-Mailing Requestors assigned to a CD throughout the state of North

Carolina is 14.1 percent.<sup>7</sup> Excluding CD 9 from this calculation, the rate of Non-Mailing Requestors outside of CD 9 is 13.2 percent.

- 40. CD 9 also had the highest rate of Non-Voting Requestors in the state of North Carolina in the 2018 General Election. Of the 16,299 Requestors in CD 9, 2,484 (15.2 percent) were Non-Voting Requestors. Across the other 12 CDs in North Carolina (excluding CD 9) the rate of Non-Voting Requestors is 10.3 percent.
- 41. In sum, these data reveal an unusually large number of voters in CD 9 who did not return their absentee mail ballots and did not vote compared with the rest of the State of North Carolina. Examination of specific counties reveals where those problems are most highly concentrated – in Bladen and Robeson Counties.

**A.3. North Carolina Counties**

**A.3.1. Overall Patterns**

- 42. In the average county in North Carolina, 1 out of 7 Requestors were Non-Mailing Requestors. Specifically, the average rate of Non-Mailing Requestors among the counties is 14.6 percent and the median county has a rate of Non-Mailing Requestors of 13.7 percent.<sup>8</sup> However, certain counties in the state have rates of Non-Mailing Requestors significantly above those averages.

County Name	Number of Requestors	Number of Non-Mailing Requestors	Percent of Non-Mailing Requestors
ROBESON	2313	1213	52.4%
BLADEN	1644	575	35.0%
COLUMBUS	558	150	27.9%
RICHMOND	472	131	27.8%
MONTGOMERY	286	76	26.6%
HALIFAX	337	85	25.2%
STATE OF NORTH CAROLINA	132,188	14,527	10.9%

NOTE: Number of Individuals for whom at least one Record in absentee\_20181106.csv with ballot\_req\_type equal "MAIL" and for whom ballot\_rtn\_status equal blank.

<sup>7</sup> A small number of registered voters in the file absentee\_20181106 are not assigned to a CD.

<sup>8</sup> This calculation is for the average county. The overall rate of Non-Return Registrants is 10.9 percent. See Table 2.

43. The counties with the five highest rates of unreturned absentee mail ballots are Robeson County, Bladen County,<sup>9</sup> Richmond County, Columbus County, and Montgomery County. See Table 2. That is, Robeson’s rate of unreturned ballots is three times the average county, Bladen’s rate is two times larger than the average county, and the rates of unreturned ballots in Richmond, Columbus, and Montgomery are 66 percent higher the rate of unreturned ballots in the average county.

**A.3.2. CD 9 Counties**

Table 3. Number of Non-Mailing Requestors, Counties and Portions of Counties in CD 9			
County Name	Number of Requestors	Number of Non-Mailing Requestors	Percent of Non-Mailing Requestors
ROBESON	2,313	1,184	51%
BLADEN (CD 9 Portion)	1,366	455	33%
RICHMOND	468	116	25%
ANSON	257	59	23%
CUMBERLAND (CD 9 Portion)	955	221	23%
SCOTLAND	369	79	21%
UNION	3,557	535	15%
MECKLENBURG (CD 9 Portion)	7,012	753	11%
STATE OF NORTH CAROLINA	132,188	14,527	10.9%
NOTE: Number of Individuals for whom at least one Record in absentee_20181106.csv with ballot_req_type equal “MAIL” and for whom ballot_rtn_status equal blank.			

44. The counties of NC CD 9 exhibit a wide range of rates of Non-Mailing Requestors, from 11 percent in Mecklenburg County (CD 9 portion) and 15 percent in Union County, to 33 percent in Bladen County (CD 9 portion) and 51 percent in Robeson.
45. Bladen and Robeson counties exhibit very high rates of unreturned ballots relative to the rest of CD 9 and other the rest of the state. To be sure, Bladen and Robeson counties are not the only counties in CD 9 or surrounding area with elevated rates of unreturned absentee ballots. For

<sup>9</sup> The figures in this paragraph and Table 2 refer to Bladen County as a whole, including both CD 9 and CD 7.

example, Columbus (in CD 7), and Richmond, Anson, and Cumberland (in CD 9) also have rates of unreturned ballots at least 50 percent higher than the state as a whole.

46. These high rates of unreturned ballots are not, however, the rule. Mecklenburg accounts for the largest number of absentee mail ballots in CD 9 (approximately 40 percent) and it has a lower than average rate of unreturned mail ballots. That is true in the portion of Mecklenburg in CD 9 and the portion in CD 12. Brunswick and Moore counties also have below average rate of unreturned ballots. Union, Cabarrus, Cumberland (CD 8 portion), Sampson and Stanly all have rates of unreturned mail ballots around the state average. And even compared with the counties with elevated rates of unreturned ballots in this area, Bladen and Robeson stand out as having by far the highest rates.<sup>10</sup>

## **B. Non-Returned Absentee Mail Ballots in Bladen and Robeson Counties**

47. As discussed above, Bladen and Robeson counties exhibit unusually high rates of non-returned absentee ballots. In this section I look more closely at these counties and provide statistical evidence that they are indeed statistical outliers.

### **B.1. Rates of Non-Returned Ballots in Bladen County**

48. 1,366 individuals requested absentee mail ballots in the portion of Bladen County that is in CD 9. See Table 4.

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<sup>10</sup> The rates of Non-Mailing Requestors in other surrounding counties includes 11 percent in Brunswick, 27 percent in Bladen (CD 7 portion), 12 percent in Mecklenburg (CD 12 portion), 14 percent in Cabarrus (CD 8), 27 percent in Columbus (CD 7), 17 percent in Cumberland (CD 8 part), 21 percent in Hoke (CD 8), 12 percent in Mecklenburg (CD 12 part), 25 percent in Montgomery (CD 8), 13 percent in Moore (CD 8), 18 percent in Sampson (CD 7), and 16 percent in Stanly (CD 8).

TABLE 4. DISPOSITION OF MAIL BALLOTS IN THE PORTION OF BLADEN COUNTY IN CONGRESSIONAL DISTRICT 9 IN THE STATE OF NORTH CAROLINA IN 2018 GENERAL ELECTION					
		<u>Outcomes of Requestors' Mail Ballots</u>			
	Requestors	Requestors whose Mail Ballot was Returned and Accepted	Requestors whose Mail Ballot was Returned but Not Accepted	Requestors whose Mail Ballot was Not Returned	Requestors whose Mail Ballot was Never Sent by County
<u>Requestors' Voting Outcomes</u>					
Requestors who Did Not Vote in Election (any method - mail, early, election day)	424	0	67	337 (25.9%) ["Non-Voting Requestors"]	0
Requestors who Voted in Election (any method - mail, early, election day)	942	808	3	118	1
TOTAL	1,366	808	70	455 (33.3%) ["Non-Mailing Requestors"]	1

49. Of these 1,366 requestors in Bladen County, 455 (33 percent) were Non-Mailing Requestors.

50. Of these 455 people, 118 voted some other way, such as one-stop or in-person on Election Day. Hence, of the 1,366 requestors in Bladen County, 337 (or 25.9 percent) were Non-Voting Requestors.

**B.2. Rates of Non-Returned Ballots in Robeson County**

51. 2,314 individuals requested absentee mail ballots in Robeson County, which lies entirely in CD 9. See Table 5.

TABLE 5. DISPOSITION OF MAIL BALLOTS IN THE ROBESON COUNTY IN CONGRESSIONAL DISTRICT 9 IN THE STATE OF NORTH CAROLINA IN 2018 GENERAL ELECTION					
		<u>Outcomes of Requestors' Mail Ballots</u>			
	Requestors	Requestors whose Mail Ballot was Returned and Accepted	Requestors whose Mail Ballot was Returned but Not Accepted	Requestors whose Mail Ballot was Not Returned	Requestors whose Mail Ballot was Never Sent by County
<u>Requestors' Voting Outcomes</u>					
Requestors who Did Not Vote in Election (any method - mail, early, election day)	856	0	24	832 (35.9%) ["Non-Voting Requestors"]	0
Requestors who Voted in Election (any method - mail, early, election day)	1,458	1,096	9	352	1
TOTAL	2,314	1,096	33	1,184 (51.2%) ["Non-Mailing Requestors"]	1

52. Of these 2,314 requestors, 1,184 (51 percent) were Non-Mailing Requestors.

53. Of these 1,184 Non-Mailing Requestors, 352 voted some other way, such as one-stop or in-person on Election Day. Hence, of the 2,314 Requestors in Robeson County, 832 Requestors (or 36.0 percent) were Non-Voting Requestors. See Table 4.

**B.3 Rates of Non-Returned Ballots Elsewhere in CD 9**

54. 12,619 individuals requested absentee mail ballots in the portions of CD 9 other than Bladen and Robeson Counties. See Table 6.

TABLE 6. DISPOSITION OF MAIL BALLOTS IN THE PORTIONS OF CONGRESSIONAL DISTRICT 9 EXCEPTING BLADEN AND ROBESON COUNTIES IN 2018 GENERAL ELECTION					
				<u>Outcomes of Requestors' Mail Ballots</u>	
	Requestors	Requestors whose Mail Ballot was Returned and Accepted	Requestors whose Mail Ballot was Returned but Not Accepted	Requestors whose Mail Ballot was Not Returned	Requestors whose Mail Ballot was Never Sent by County
<u>Requestors' Voting Outcomes</u>					
Requestors who Did Not Vote in Election (any method - mail, early, election day)	1,733	0	396	1,315 (10.2%) ["Non-Voting Requestors"]	21
Requestors who Voted in Election (any method - mail, early, election day)	10,886	10,404	38	443	1
TOTAL	12,619	10,404	434	1,758 (13.9%) ["Non-Mailing Requestors"]	22

55. Of these 12,619 requestors, 1,758 (13.9 percent) were Non-Mailing Requestors.
56. Of these 1,758 Non-Mailing Requestors, 443 voted some other way, such as one-stop or in-person on Election Day. Hence, of the 12,619 requestors in the portions of CD 9 other than Bladen and Robeson Counties, 1,315 requestors (or 10.2 percent) were Non-Voting Requestors. See Table 4.

**B.3. Bladen and Robeson are Statistical Outliers**

57. Bladen and Robeson counties have rates of unreturned absentee mail ballots that are exceptional and statistical outliers compared with the other counties in CD 9 and with the remainder of the state of North Carolina.
58. As demonstrated in Tables 4, 5, and 6 above, the rates of Non-Voting Requestors in Bladen and Robeson counties, 25.9% and 34.9% respectively, are significantly higher than elsewhere in CD 9 (10.2%) and in the state as a whole (10.9%).
59. To test for the possibility that these counties are outliers, I measured the probability that the results in Bladen and Robeson could have emerged by chance if the absentee balloting had followed the same patterns that existed elsewhere in the state. The idea behind this statistical test is that the return rates statewide follow a similar pattern. While not every county is identical, and there is variation in non-return rates based on particular characteristics of the counties, they vary closely around the overall statewide rate of non-returned ballots. I, then, measure the deviation of the non-return rates in Bladen and Robeson counties from the statewide rate to see if these counties deviate from the statewide rate, if so by how much, and then calculate how likely those counties' deviations are to have arisen by chance, given the variation among the other 98 counties.
60. I measured the average and variation of the rate of Non-Mailing Requestors among all counties except for Bladen and Robeson in the entire state of North Carolina. Then, using a standard statistical test, I measured the probability of observing Non-Return rates as large as those in Bladen or in Robeson given the variation in Non-Return rates observed throughout the rest of the state.<sup>11</sup>
61. For both Bladen and Robeson counties, the probability of observing a Non-Return rate that high or higher is essentially zero. Specifically, the probability of observing a Non-Return rate as high as observed in Bladen County is less than 0.0001. Likewise, the probability of observing a Non-Return rate as high as in Robeson County is less than 0.0001. The Non-Return rates in both counties, then, are highly unlikely to have arisen from the same processes and patterns that exist throughout the rest of the state.

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<sup>11</sup> Specifically, I calculated the t-statistic for the test that the results in Bladen or Robeson could have come from the same distribution of Non-Return states exhibited across the other 98 counties in North Carolina. The t-statistic for the difference between the rate of non-returned ballots in Bladen and the 98 counties in North Carolina is 7.64. The t-statistic for the difference between the rate of non-returned ballots in Robeson and the other 98 counties in North Carolina is 15.52.



62. In sum, the Non-Return rates in Bladen and Robeson are extremely different from that observed in the rest of the state, and those differences are extremely unlikely to have arisen by chance. Bladen and Robeson are extreme outliers compared to the rest of the counties in North Carolina.
63. This does not mean that any interference that took place in Bladen and Robeson did not also occur in other counties. For example, there are allegations of potential interference in Columbus County. Rather, this analysis shows that Bladen and Robeson are highly unusual within the state and show deviations in Non-Returned ballots well above what happened elsewhere.

#### **B.4. Specific Examples in Bladen and Robeson**

64. Looking more closely at Bladen and Robeson counties reveals even more pronounced patterns in certain towns, and exposes other potential issues with absentee mail ballots that were returned but not accepted by the counties.
65. In Robeson County, half of all Requestors did not return an absentee ballot. Even within Robeson, though, several towns stood out for their extremely high rates of Non-Mailing Requestors. In the town of Rowland, 64 percent of requestors were Non-Mailing Requestors; in Parkton, 61 percent; in Pembroke, 59 percent; in Lumber Bridge, 59 percent; in Maxton, 53 percent; in Lumberton 51 percent and in Saint Pauls 49. The lowest rate of Non-Mailing Requestors in Robeson County is in Red Springs, at 35 percent. Each of these towns is well above the statewide average and the average rate of returns elsewhere in CD 9.
66. These towns have substantial African American and Native American populations. According to the American Community Survey of the US Census Bureau, Robeson County is 25 percent non-Hispanic White; it is 24 percent African American, and it is 41 percent Native American. The town of Pembroke is particularly notable, as it has a significant concentration of members of the Lumbee Tribe. According to the 2013-2017 American Community Survey, conducted by the US Census Bureau, Pembroke is a town of 3,056 people, and there are 1,689 people who are American Indian alone (i.e., that is their sole ethnic or racial identity) in the town of Pembroke. Of 184 requestors who identify as Native American in Pembroke, 104 (57 percent) were Non-Mailing Requestors. That is a very high non-return rate.
67. In the rest of the state of North Carolina (outside of Bladen and Robeson counties), 536 Requestors were Native American. Of these, 115 (21 percent) were Non-Mailing Requestors. The problems in the town of

Pembroke, whatever they were, resulted in a non-mailing rate of the Native Americans in this town that were 3 times the state average for that group. As discussed in the next section, Pembroke was not an exception in Robeson and Bladen counties.

68. Closer examination of the towns suggests some other potential issues as well. Red Springs had the lowest non-return rate for Robeson County – of 35 percent. However, the rate of ballots that were returned but not accepted by the county election office was a whopping 28 percent in Red Springs. Fairmont also had an unusually high rate of unaccepted ballots of 30%. These results may suggest other potential interference with absentee mail ballots in the county.
69. The portion of Bladen County in CD 9 had 33 percent rate of Non-Mailing Requestors. In the towns of Bladenboro and Elizabethtown, the rates of Non-Mailing Requestors were 38 and 34 percent respectively. These are the two most populous towns in Bladen County. Bladenboro had over 700 requests for absentee mail ballots; Elizabethtown had almost 500 requests for absentee mail ballots. These anomalies were not limited to those more populous communities. In the less populous town of Harrells, the rate of Non-Mailing Requestors was 25; in Dublin, 46 percent; in Clarkton, 42 percent; in White Oak, 35 percent.
70. Elizabethtown also exhibited a high rate of mail ballots that were not accepted by the county. Of the 463 requests, 71 (15 percent) resulted in the County Election Office not accepting the absentee mail ballot. As a result, only 48 percent of absentee mail ballot requests in Elizabeth Town resulted in an accepted mail ballot. Bladenboro was nearly the same. Of 709 requests for absentee mail ballots, 84 (12 percent) resulted in ballots that were not accepted by the County Election Office. And, only 46 percent of absentee mail ballot requests in Bladenboro resulted in an accepted mail ballot.
71. Closer examination of the towns in Bladen and Robeson counties, then, reveals that the high rates of non-returned absentee ballots were widespread in these counties. This potential interference hit minority communities, such as the American Indian community in Pembroke, particularly hard. And many towns also provided evidence of other potential issues with absentee ballots that were returned but not accepted by the county.

### **C. Results in Bladen and Robeson Are Atypical for Specific Groups of Voters**

72. A possible explanation for the very high rate of non-returned absentee mail ballots in Bladen and Robeson counties is that it reflects the composition of these counties. First, it might be the case that the

requestors included many new registrants, who tend to vote at lower rates, even after requesting a mail ballot. Second, it might be that a demographic or partisan group that has a lower propensity to vote is more heavily represented in these counties. In either instance, the groups would have voted largely consistently with expected patterns seen elsewhere in the state, and there just happened to be many members of these groups among requestors in Robeson and Bladen counties. Were that the case, the low return rate, then, would be a spurious consequence of the heavy concentration of such a group in these counties.

73. But these theories, it turns out, are not supported by the data and therefore do not explain what happened in Bladen and Robeson counties. For example, the rate of non-voting among new voter requestors in Bladen and Robeson is 30 percentage points higher than that of new voters elsewhere in CD 9 or in the state. More striking still, the rate of non-voting among requestors who have voted in many elections in the past is also 30 percentage points higher than similarly experienced voters elsewhere in CD 9 or in the state. Comparing the return rates of racial and partisan groups inside and outside of Bladen and Robeson counties also shows striking differences. The non-voting rates of requestors of all racial and all partisan groups in these counties are much higher than their counterparts elsewhere in CD 9 and in the state. These differences suggest that the patterns of absentee mail voting in these counties are not a product of the voting experience of registrants or of the racial and partisan composition of the counties. Rather, then non-voting rates among requestors within these counties are extremely high compared to the rest of the state. That is true for the population as a whole, and for every one of the groups (experience, race, and party) that I examined.

### **C.1. Experience Voting in Past Elections**

74. One plausible explanation for the patterns observed in Bladen and Robeson counties might be that there had been a registration and get-out-the-vote effort that attempted to mobilize many new voters by getting them to vote absentee mail ballots. Because new voters tend to vote at lower rates than experienced voters, and more new voters were signed up to vote by mail absentee ballot, this might account for higher non-return rates in the two counties.
75. To test this conjecture, I compared the rate of non-voting in Bladen and Robeson counties with the non-voting rate elsewhere in CD 9 and elsewhere in the state for each of three groups of requestors. Group 1 are New Voters, or requestors who had not voted in prior elections according to the North Carolina State Board of Elections vote history data. Group 2 are Occasional Voters, or requestors who had voted in one, two, or three

prior elections over the past 6 years. This group would include relatively new registrants as well as those who only voted occasionally over the past 6 years. Group 3 are Frequent Voters, or requestors who had voted at least 4 times in the past 6 years. For example, someone who voted in every federal general election (2012, 2014, 2016, and 2018) would be a Frequent Voter in Group 3. These are displayed in Table 7 below. For simplicity, I combined Bladen and Robeson counties; the results are qualitatively the same treating them separately.

TABLE 7. NON-VOTING REQUESTORS BY FREQUENCY OF VOTING IN PAST ELECTIONS			
	Location of Non-Voting Requestor		
	Bladen (CD 9 part) and Robeson Counties [Num. of Requestors]	Rest of CD 9	Rest of State of North Carolina
<u>Non-Voting Requestors' Experience Voting in Prior Elections</u>			
New Voter (2018 is first election in Voter History)	48.7 % [469]	14.4% [1,944]	15.8% [17,325]
Occasional Voter: Voted 2 - 4 Prior Elections	40.5% [432]	14.8% [1,894]	15.0% [18,298]
Frequent Voter: Voted 4+ Prior Elections	41.7% [352]	9.7% [1,683]	11.7% [16,934]

76. New voter requestors in Bladen and Robeson counties, shown in the first cell of Table 9 above, indeed have very high rates of non-voting – almost half of the total overall. Specifically, 49 percent of New Voter requestors in Bladen and Robeson counties had no returned mail ballot and recorded no vote through other means. Comparing across the first row of the table, however, there is a striking difference between New Voter requestors in Bladen and Robeson counties compared with New Voter requestors elsewhere in CD 9 and elsewhere in the state. For example, in the remainder of CD 9, 14 percent of New Voter requestors were Non-

Voting Requestors. In the remainder of the state, the rate is 16 percent. Hence, New Voter requestors in Bladen and Robeson had a non-voting rate of 49 percent, which is more than 30 points higher than the non-voting rate of New Voters elsewhere in the state.

77. I also examined the non-voting rates of Occasional and Frequent voter requestors. In Bladen and Robeson counties, the non-voting rates of those two groups of requestors exceed 40 percent, which is nearly as high as the non-voting rate for New Voter requestors in the two counties.
78. As with New Voters, the non-voting rate is 30 points higher for Occasional and Frequent Voter requestors in Bladen and Robeson counties than it is in the rest of CD 9 or in the rest of North Carolina. The rate of non-voting for Occasional voter requestors is 15 percent in the rest of CD 9 and 15 percent in the rest of the state, compared with 41 percent in Bladen and Robeson counties. The rate of non-voting for Frequent Voter requestors is 10 percent in the rest of CD 9 and 12 percent in the rest of the state, compared with 42 percent in Bladen and Robeson counties.
79. This pattern squarely contradicts the notion that the results in Bladen and Robeson are the result of a high number of New Voters. Whatever happened in Bladen and Robeson counties affected the ability of New Voters, Occasional Voters, and Frequent Voters to cast absentee ballots by mail alike.

## **C.2. Race**

80. A somewhat different possibility is that Bladen and Robeson counties differ from the rest of CD 9 or from the rest of the state in their racial composition, and that groups overrepresented in these counties might have low propensities to vote. As noted earlier, these counties do have high minority populations. Robeson has an especially large Native American population, and both counties have large African American populations.
81. The unreturned rates among racial groups reveal three patterns.
82. First, Bladen and Robeson counties are distinctive in that African American voters and Native American voters combined make up the majority of individuals who requested absentee mail ballots. Elsewhere in the state, Whites voters comprised 75 to 80 percent of the individuals who made such requests. In Bladen and Robeson counties combined, however, 36 percent of all people who requested absentee mail ballots were African American; 18 percent, Native American; and 42 percent, White. In the part of Bladen County that is in CD 9, 31 percent of absentee mail ballot requests came from African Americans, 1 percent from Native

Americans, and 67 percent from whites. In Robeson County, 40 percent of absentee mail ballot requests came from African Americans; 28 percent, from Native Americans, and 26 percent from Whites.

- 83. Second, in the rest of NC 9 and the rest of the state, White voters, African American votes, and Native American requestors have similar rates non-voting: about 9 percent for White requestors, and about 13 to 15 percent for African American and Native American requestors.
- 84. Third, in Bladen and Robeson counties, White requestors and Black requestors also have similar rates of non-voting, but those rates are much higher than the rest of the state: the rate at which African American individuals did not return ballots and did not vote in any other way is 21 percent in Bladen and 33 percent in Robeson. The rate at which white individuals did not return ballots and did not vote in any other way is 26 percent in Bladen and 31 percent in Robeson. The rate of non-voting among Native American requestors is particularly high in Robeson County, at 43%. See Table 8 below.

TABLE 8. NON-VOTING REQUESTORS BY RACE			
	Race of Non-Voting Requestors		
	White	African-American	Native American
<u>Location of Non-Voting Requestors</u>			
BLADEN	240 (26.2%)	89 (21.1%)	5 (38.5%)
ROBESON	191 (31.2%)	298 (32.5%)	277 (43.0%)
REST OF NC9	873 (9.3%)	235 (14.3%)	14 (14.4%)
REST OF THE STATE OF NORTH CAROLINA	7,946 (9.4%)	2,510 (13.3%)	66 (15.2%)

- 85. These three patterns indicate that high non-return rates in Bladen and Robeson counties are not a consequence of the racial composition of CD 9. Even though the request rate of minority groups is very large in Bladen and Robeson counties compared with the rest of the state, it is the particularly high non-non-return rate of each group– African American, Native American, and White – as compared to their counterparts elsewhere in the state that produces the high overall non-return rate in the two counties.

**C.3. Party Registration.**

- 86. Party registration shows a similar story to race. Every partisan group in Bladen and Robeson counties has an elevated rate of unreturned ballots as compared to the same partisan groups in the rest of the state. However, owing to the relatively low number of Republican absentee mail ballot requests in the area, Democratic and Unaffiliated registrants were affected disproportionately.
- 87. First, in Bladen and Robeson combined, Democrats accounted for almost 60 percent of absentee ballot requests and Republicans only 13 percent. In the two counties combined, 3,680 individuals requested absentee mail ballots. Of these, 2,102 were from Democratic registrants; 501 were from Republican registrants; and 1,069 were from Unaffiliated registrants.
- 88. Second, the rates of non-returned ballots in Bladen and Robeson counties are much higher for each group than for their counterparts elsewhere in the state. See Table 9 below.

TABLE 9. NON-VOTING REQUESTORS BY PARTY			
	Party Affiliation of Non-Voting Requestor		
	Republican	Democratic	Unaffiliated
Location of Non-Voting Requestor			
BLADEN	96 (31.7%)	102 (19.1%)	139 (26.4%)
ROBESON	65 (32.3%)	527 (33.6%)	239 (44.1%)
REST OF NC9	289 (9.2%)	588 (10.1%)	432 (10.1%)
REST OF THE STATE OF NORTH CAROLINA	2,784 (9.2%)	5,221 (10.4%)	3,972 (11.2%)

- 89. As shown above, the non-voting rate for Democratic requestors elsewhere in the state is 10 percent, but it is 19 percent in Bladen and 34 percent in Robeson. The non-voting rate for Unaffiliated requestors elsewhere in the state is 11 percent, but it is 26 percent in Bladen and 44 percent in Robeson. The non-voting rate for Republican requestors is 9 percent, but it is 32 percent in Bladen and 32 percent in Robeson.

90. Hence, the high rates of unreturned ballots do not result from having one group that has an unusually high rate of unreturned ballots being over represented in the area. Rather, every partisan group has highly elevated rates of unreturned ballots in these counties when compared with the rest of CD 9 and the rest of the state.
91. Owing to the higher rate of requests, Democrats and Unaffiliated registrants make up a much larger percent of individuals who requested mail ballots, did not return them, and did not cast a vote in any other way. In Bladen and Robeson combined, there are 161 Republican registrants who did not return their mail ballots and did not vote any other way. There are 378 such cases of Unaffiliated registrants. And, there are 629 such cases of Democratic registrants. Thus, in Bladen and Robeson counties, Democratic registrants account for 54 percent of individuals who requested mail ballots but did not return them and did not vote in any other way. Republicans accounted for just 14 percent of such cases.
92. In sum, the unusually high rates of unreturned absentee mail ballots in Bladen and Robeson are extreme statistical outliers compared to the rest of the state. These anomalies are not explained by the demographic or partisan composition of the counties; nor are these patterns explained by an unusually high rate of new registrants who did not return their absentee ballots. Rather, the rates of unreturned ballots are elevated for all groups – based on voting experience, race, and party registration – in Bladen and Robeson counties when contrasted with the compatriots of each group elsewhere in the state.

#### **D. Conclusion**

93. CD 9 is an outlier in the rate of unreturned absentee mail ballots compared with the rest of the state. Bladen and Robeson Counties are outliers in the rate of unreturned absentee ballots compared with the rest of CD 9 and with the rest of the state. The observed deviations are extremely unlikely to have arisen by chance, and plausible alternative explanations having to do with the nature of the electorate in these counties cannot account for the extremely high non-return rates in Bladen and Robeson counties. Rather, every group of voters who requested absentee mail ballots seems to have encountered substantial obstacles to submitting an Accepted absentee mail ballot. These patterns are consistent with allegations of interference with the absentee mail ballot process.
94. Finally, the data indicates that hundreds of votes may have been affected by these irregularities. 3,680 individuals in Bladen and Robeson Counties requested absentee ballots. The mail ballots of 1,639 individuals in Bladen and Robeson Counties combined were never returned to county elections offices. And 1,169 of these individuals never ended up casting a ballot in the election.



95. Further, these figures likely understate the magnitude of any potential interference with absentee mail ballots, as they do not incorporate other potential irregularities, such as relatively high rates of absentee mail ballots that were received by the county elections offices but were not accepted and counted.

#### **E. Partisan Affiliation of Absentee Mail Requests compared with Partisan Outcomes of Absentee Mail Votes**

96. This section of my report examines the allegation that an organized group collected absentee mail ballots from voters, completed or altered the ballots to favor one or more candidates, and then submitted them. As discussed above, such actions could result in differences between the partisan affiliation of the voters whose absentee ballots are returned and the partisan outcome of the contests on the ballot. It is well established in Political Science research that people who identify with or register with a political party have a very high probability of voting for that party in general elections. In order to attempt to fraudulently alter election outcomes in favor of a candidate from one party, a perpetrator who intercepted the absentee ballot of a member of another party would cast a vote contrary to how that voter would have normally voted.
97. Consider a somewhat extreme example to clarify the logic. Suppose, for instance, that half the ballots are requested by individuals registered with party A and half are from party B. Suppose further, that all Party A registrants would vote for party A and all Party B registrants vote for Party B. Suppose, finally, that half of all ballots are intercepted and voted by an individual who sides with party B, and that individual marks all of the intercepted ballots for party B. In such a situation, party A would win one-fourth of the votes even though one half of the votes came from party A registrants. The reason is that half of the ballots of Party A registrants are intercepted and changed to votes for party B. Party A would win those votes of Party A registrants that were not intercepted; that is one half of one half of the ballots, or one quarter of the ballots. Party B, on the other hand, would win three quarters of the votes, even though only half of the registrants are from party B. The reason is that the person who intercepted the ballots would choose party B for the ballots. Hence, party B would win all of the votes of those people registered with Party B, and party B would additionally win the intercepted ballots of party A registrants whose votes were cast for party B.
98. This hypothetical example merely demonstrates the consequences of such interference if it occurred, but it does describe the general pattern of absentee votes and absentee ballot requests that would be consistent with such behavior. Specifically, if such interference occurred on behalf of, say, the Republican candidate, then the Republican candidate would receive disproportionately many absentee votes compared to absentee

ballot requests from Republican registrants, and the Democratic candidate would receive disproportionately few absentee votes compared to absentee ballot requests from Democratic registrants. To gauge whether the data are consistent with such behavior, I measure the proportion of Democratic, Republican, and Unaffiliated registrants who cast absentee mail ballots in Bladen and Robeson Counties, and compare those figures to the proportion of absentee votes received by Democratic and Republican candidates. I further compare those figures to the rest of CD 9 and the rest of the state of North Carolina to see if the patterns are unusual. This analysis is presented in Table 10.

99. Table 10 compares the partisan breakdown of registrants whose mail ballots were accepted by the county elections offices and the absentee mail vote cast for the Democratic and Republican candidates for US House of Representatives. The analysis is performed for Bladen County (part in CD 9), Robeson County, CD 9, and the State of North Carolina. Table 11 distills the essential facts from this analysis and compares the percent of absentee votes and absentee ballot request for each area.
100. Throughout the State of North Carolina 41 percent of accepted absentee mail ballots came from Democratic registrants, 23 percent of accepted absentee mail ballot requests came from Republican registrants, and 31 percent of accepted mail absentee ballot requests came from Unaffiliated registrants. Democratic candidates for US House won 58 percent of absentee mail votes statewide. That is, Democratic candidates won the absentee mail vote by 17 percentage points more than the percent of accepted absentee ballots that came from Democratic registrants. Republican candidates for US House won 41 percent of absentee mail votes for US House statewide. That is, Republican candidates won the absentee mail vote by 13 percentage points more than the percent of accepted absentee mail ballots that came from Republican registrants. This pattern is consistent with an accounting of votes in which almost all Democratic registrants voted Democratic, almost all Republican registrants voted Republican, and Unaffiliated registrants split their votes.
101. In the non-Bladen and Robeson portions of CD 9, absentee mail ballots and absentee mail votes follow the same pattern as the rest of the state. The last panel of Table 10 compares the partisan breakdown of absentee ballots and mail votes in the remainder of CD 9 (excluding Bladen and Robeson Counties). Specifically, Democratic registrants had 3,770 absentee mail ballots accepted; Republican registrants had 2,536 vote by mail ballots accepted, and Unaffiliated registrants had 3,007 mail ballots accepted. Democratic registrants were the plurality of accepted absentee mail ballots, and the Democratic candidate won the majority of the absentee mail votes.

TABLE 10. DIFFERENCES BETWEEN PARTISAN AFFILIATION OF VOTERS WHOSE ABSENTEE MAIL BALLOTS WERE ACCEPTED AND PARTISAN OUTCOMES OF ABSENTEE MAIL VOTES CAST FOR US HOUSE					
STATE OF NORTH CAROLINA					
	Democratic Registrants	Republican Registrants	Unaffiliated Registrants	Other Party Registrants	TOTAL
Mail Ballots Accepted	40,251 (41.3 %)	26,790 (27.5 %)	30,162 (30.9 %)	368 (0.4 %)	97,571
	Democratic Candidate	Republican Candidate		Other Party Candidate	
Mail Votes for US House	54,898 (57.9%)	38,678 (40.8%)		1,181 (1.2%)	94,757
CONGRESSIONAL DISTRICT 9					
Bladen County					
	Democratic Registrants	Republican Registrants	Unaffiliated Registrants	Other Party Registrants	TOTAL
Mail Ballots Accepted	286 (42.1%)	130 (19.1%)	262 (38.6%)	1 (0.1%)	679
	Democratic Candidate	Republican Candidate		Other Party Candidate	
Mail Votes for US House	258 (37.7%)	420 (61.4%)		6 (0.9%)	684
Robeson County					
	Democratic Registrants	Republican Registrants	Unaffiliated Registrants	Other Party Registrants	TOTAL
Mail Ballots Accepted	405 (58.6%)	104 (15.1%)	180 (26.1%)	2 (0.2%)	691
	Democratic Candidate	Republican Candidate		Other Party Candidate	
Mail Votes for US House	403 (59.2%)	259 (38.1%)		18 (2.6%)	680
Remainder of CD 9					
	Democratic Registrants	Republican Registrants	Unaffiliated Registrants	Other Party Registrants	TOTAL
Mail Ballots Accepted	3,770 (40.4%)	2,536 (27.1%)	3,008 (32.2%)	30 (0.3%)	9,343
	Democratic Candidate	Republican Candidate		Other Party Candidate	
Mail Votes for US House	5,810 (62.6%)	3,348 (36.1%)		129 (1.4%)	9,287
Sources: NCSBE data: absentee_20181106.csv, results_20181106.csv.					

As shown in Table 10, Dan McCready won 5,810 absentee mail votes. That is, McCready won 2,040 more votes than there were Democratic votes by mail. In counties other than Bladen and Robeson in CD 9, Mark Harris won 3,348 absentee mail votes. That is 812 more votes than there were accepted absentee mail ballots from Republican registrants.

102. Bladen and Robeson Counties break from this pattern. In Bladen and Robeson Counties, the Democratic candidate received slightly fewer absentee mail votes than there were accepted absentee mail ballots from Democratic registrants, and the Republican candidate for US House in CD 9 received disproportionately more votes than there were absentee mail ballot requests from Republican registrants.
103. In Bladen county, the county election office accepted 286 absentee mail ballots from Democrats, 116 absentee mail ballots from Republicans, and 262 absentee mail ballots from voters with Unaffiliated registration. Dan McCready received 258 absentee mail votes – 18 less than the number of mail ballots from Democratic voters. Mark Harris received 420 absentee mail ballots – 294 more than the number of mail ballots from Republican voters.
104. In Robeson county, the election office accepted 405 absentee mail ballots from Democrats, 104 absentee mail ballots from Republicans, and 180 absentee mail ballots from voters with Unaffiliated registration. Dan McCready received 403 absentee mail votes – 2 less than the number of mail ballots from Democratic voters. Mark Harris received 259 absentee mail ballots – 147 more than the number of mail ballots from Republican voters.
105. These results are highly unusual compared with the patterns elsewhere in CD 9 and in the state of North Carolina as a whole.
106. To put this in perspective, assume, as above, that McCready and Harris won all of their own partisans' mail ballots in CD 9 (except in Bladen and Robeson Counties). Under this assumption, McCready would have won 67.8 percent of the Unaffiliated and Harris would have won 27.0 percent of the Unaffiliated throughout CD 9 (except in Bladen and Robeson Counties). But Bladen and Robeson are completely the opposite. Again, assume that the candidates won their own partisans' absentee mail ballots. Then, McCready would win none of the Unaffiliated ballots, and Harris would win almost all of the Unaffiliated ballots (a small percent would go to a third-party candidate or not vote). Under this assumption McCready won approximately two-thirds of the Unaffiliated vote in CD 9 and none of the Unaffiliated vote in Bladen and Robeson.

TABLE 11. DIFFERENCES BETWEEN PARTISAN AFFILIATION OF VOTERS WHOSE ABSENTEE MAIL BALLOTS WERE ACCEPTED AND PARTISAN OUTCOMES OF ABSENTEE MAIL VOTES CAST FOR US HOUSE		
	Percent of Mail Votes For Democrats (US House)  Minus  Percent of Mail Ballots from Democratic Registrants	Percent of Mail Votes for Republican (US House)  Minus  Percent of Mail Ballots from Republican Registrants
State of North Carolina	+ 16.6 (57.9 % - 41.3 %)	+13.3 (40.8 % - 27.5 %)
CD 9 (except Bladen and Robeson Counties)	+22.4 (62.6 % - 40.4 %)	+9.0 (36.1 % - 27.1 %)
Bladen County (part in CD 9)	-4.4 (37.7 % - 42.1 %)	+42.3 (61.4 % - 19.1 %)
Robeson County	+0.6 (59.2 % - 58.6 %)	+23.0 (38.1 % - 15.1 %)

107. Table 11 presents another way to appreciate the peculiarity of the absentee vote patterns in Bladen and Robeson. This table presents the difference between the share of the absentee mail votes won by each candidate and the share of absentee mail ballots requested by members of the partisan groups. Statewide, Democrats won 16.6 points higher vote percentage than their party’s registrants’ percentage of the absentee ballots, and Republicans won 13.3 points higher vote percentage than their registrants’ percentage of absent mail ballots. For example, Democrats were 41.3 percent of registered voters whose ballots were accepted, and Democratic candidates won 57.9 percent of mail ballots statewide. That is a difference of 16.6 points.

108. In CD 9, except for Bladen and Robeson counties, Dan McCready won 22.4 points higher percentage of votes than of Democratic registrants among

mail ballots cast. Mark Harris won 9.0 points higher vote percentage than Republican registrants among mail ballots cast.

109. In Bladen county, however Mark Harris' percentage of votes won was 41 points higher than the percentage of Republicans among registrants who cast mail ballots. And, in Robeson county, the difference for Harris was 23 points. By comparison, the percentage of votes that Dan McCready won in Bladen county was 4 points *lower* than the percentage of Democrats among registrants who cast mail ballots. In Robeson county, that difference was essentially 0.
110. This unusual pattern is highly different from the rest of CD 9 and patterns of absentee voting in the state as a whole.

I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Name: Stephen Ansolabahere

Signature: Stephen Ansolabahere

Date: December 21, 2018

Sworn to (or affirmed) and subscribed before me this the 21 day of December, 20 18.

**The Commonwealth of Massachusetts**  
On this 21 day of December, 20 18  
before me, the undersigned notary public, Stephen Ansolabahere  
personally appeared, proved to me through  
satisfactory evidence of identification, which were  
Driver's License, to be the person whose name is  
signed on the preceding or attached document, and acknowledged  
to me that he/she signed it voluntarily for its stated purpose.



Kalan Chang  
KALAN CHANG, Notary Public  
My Commission Expires September 27, 2024

Kalan Chang  
Notary Public

Kalan Chang  
Notary's printed or typed name

My commission expires September 27, 2024.

**Appendix A. Alternative Data**

Data in the file

CIV\_ABS\_CONG\_09\_BALLOT\_NOT\_RETURNED\_EXPT\_PUBLIC\_20181204.csv. show slightly higher numbers of unreturned ballots in Bladen and Robeson Counties. They do not substantively alter my conclusions that CD 9 has an unusually high rate of unreturned absentee ballots in the state, and Bladen and Robeson Counties have extremely high rates of unreturned mail ballots.

According to these data there are 483 individuals with unreturned absentee mail ballots in Bladen County, 18 more cases than in the file absentee\_20181106.csv. They account for 33 percent of individuals who requested absentee ballots.

In Robeson County, these alternative data contain 1,197 individuals with unreturned absentee mail ballots in Robeson County, 13 more cases than in the file absentee\_20181106.csv. See Tables xx. These data indicate that 63 percent of all individuals who requested absentee mail ballots in Robeson County did not return one.

According to these data, the rate of unreturned ballots is 23 percent in CD 9 overall, approximately 2 points higher than in the file absentee\_20181106.csv. And, the rate of unreturned ballots in the CD 9 except for Bladen and Robeson Counties is 15 percent.

These data are broadly consistent with the findings from the file absentee\_20181106.csv. Though they suggest that the numbers might be slightly higher.

I do not do further analyses of these data because they cover only the counties in CD 9. Also, I do not know the methodology for generating these data.

This does not include the analysis looking at how many of their identified cases voted in person later.



**Appendix B. Curriculum Vitae**

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**EDUCATION**

Harvard University	Ph.D., Political Science	1989
University of Minnesota	B.A., Political Science	1984
	B.S., Economics	

**PROFESSIONAL EXPERIENCE****ACADEMIC POSITIONS**

2016-present	Frank G. Thompson Professor of Government, Harvard University
2008-present	Professor, Department of Government, Harvard University
2015-present	Director, Center for American Politics, Harvard University
1998-2009	Elting Morison Professor, Department of Political Science, MIT (Associate Head, 2001-2005)
1995-1998	Associate Professor, Department of Political Science, MIT
1993-1994	National Fellow, The Hoover Institution
1989-1993	Assistant Professor, Department of Political Science, University of California, Los Angeles

**FELLOWSHIPS AND HONORS**

American Academy of Arts and Sciences	2007
Carnegie Scholar	2000-02
National Fellow, The Hoover Institution	1993-94
Harry S. Truman Fellowship	1982-86



## PUBLICATIONS

**Books**

- 2019 *American Government*, 15<sup>th</sup> edition. With Ted Lowi, Benjamin Ginsberg and Kenneth Shepsle. W.W. Norton.
- 2014 *Cheap and Clean: How Americans Think About Energy in the Age of Global Warming*. With David Konisky. MIT Press. Recipient of the Donald K. Price book award.
- 2008 *The End of Inequality: One Person, One Vote and the Transformation of American Politics*. With James M. Snyder, Jr., W. W. Norton.
- 1996 *Going Negative: How Political Advertising Divides and Shrinks the American Electorate*. With Shanto Iyengar. The Free Press. Recipient of the Goldsmith book award.
- 1993 *Media Game: American Politics in the Television Age*. With Roy Behr and Shanto Iyengar. Macmillan.

**Journal Articles**

- 2018 “Policy, Politics, and Public Attitudes Toward the Supreme Court” *American Politics Research* (with Ariel White and Nathaniel Persily).  
<https://doi.org/10.1177/1532673X18765189>
- 2018 “Measuring Issue-Salience in Voters’ Preferences” *Electoral Studies* (with Maria Socorro Puy) 51 (February): 103-114.
- 2018 “Divided Government and Significant Legislation: A History of Congress,” *Social Science History* (with Maxwell Palmer and Benjamin Schneer).42 (1).
- 2017 “ADGN: An Algorithm for Record Linkage Using Address, Date of Birth Gender and Name,” *Statistics and Public Policy* (with Eitan Hersh)
- 2017 “Identity Politics” (with Socorro Puy) *Public Choice*. 168: 1-19.  
DOI 10.1007/s11127-016-0371-2
- 2016 “A 200-Year Statistical History of the Gerrymander” (with Maxwell Palmer) *The Ohio State University Law Journal*

- 2016 “Do Americans Prefer Co-Ethnic Representation? The Impact of Race on House Incumbent Evaluations” (with Bernard Fraga) *Stanford University Law Review* 68: 1553-1594
- 2016 Revisiting Public Opinion on Voter Identification and Voter Fraud in an Era of Increasing Partisan Polarization” (with Nathaniel Persily) *Stanford Law Review* 68: 1455-1489
- 2015 “The Perils of Cherry Picking Low Frequency Events in Large Sample Surveys” (with Brian Schaffner and Samantha Luks) *Electoral Studies* 40 (December): 409-410.
- 2015 “Testing *Shaw v. Reno*: Do Majority-Minority Districts Cause Expressive Harms?” (with Nathaniel Persily) *New York University Law Review* 90
- 2015 “A Brief Yet Practical Guide to Reforming U.S. Voter Registration, *Election Law Journal*, (with Daron Shaw and Charles Stewart) 14: 26-31.
- 2015 “Waiting to Vote,” *Election Law Journal*, (with Charles Stewart) 14: 47-53.
- 2014 “Macro-economic Voting: Local Information and Micro-Perceptions of the Macro-Economy” (With Marc Meredith and Erik Snowberg), *Economics and Politics* 26 (November): 380-410.
- 2014 “Does Survey Mode Still Matter?” *Political Analysis* (with Brian Schaffner) 22: 285-303
- 2013 “Race, Gender, Age, and Voting” *Politics and Governance*, vol. 1, issue 2. (with Eitan Hersh)  
<http://www.librelloph.com/politicsandgovernance/article/view/PaG-1.2.132>
- 2013 “Regional Differences in Racially Polarized Voting: Implications for the Constitutionality of Section 5 of the Voting Rights Act” (with Nathaniel Persily and Charles Stewart) 126 *Harvard Law Review* F 205 (2013)  
[http://www.harvardlawreview.org/issues/126/april13/forum\\_1005.php](http://www.harvardlawreview.org/issues/126/april13/forum_1005.php)
- 2013 “Cooperative Survey Research” *Annual Review of Political Science* (with Douglas Rivers)
- 2013 “Social Sciences and the Alternative Energy Future” *Daedalus* (with Bob Fri)
- 2013 “The Effects of Redistricting on Incumbents,” *Election Law Journal* (with James Snyder)

- 2012 “Asking About Numbers: How and Why” *Political Analysis* (with Erik Snowberg and Marc Meredith). doi:10.1093/pan/mps031
- 2012 “Movers, Stayers, and Registration” *Quarterly Journal of Political Science* (with Eitan Hersh and Ken Shepsle)
- 2012 “Validation: What Big Data Reveals About Survey Misreporting and the Real Electorate” *Political Analysis* (with Eitan Hersh)
- 2012 “Arizona Free Enterprise v. Bennett and the Problem of Campaign Finance” *Supreme Court Review* 2011(1):39-79
- 2012 “The American Public’s Energy Choice” *Daedalus* (with David Konisky)
- 2012 “Challenges for Technology Change” *Daedalus* (with Robert Fri)
- 2011 “When Parties Are Not Teams: Party positions in single-member district and proportional representation systems” *Economic Theory* 49 (March)  
DOI: 10.1007/s00199-011-0610-1 (with James M. Snyder Jr. and William Leblanc)
- 2011 “Profiling Originalism” *Columbia Law Review* (with Jamal Greene and Nathaniel Persily).
- 2010 “Partisanship, Public Opinion, and Redistricting” *Election Law Journal* (with Joshua Fougere and Nathaniel Persily).
- 2010 “Primary Elections and Party Polarization” *Quarterly Journal of Political Science* (with Shigeo Hirano, James Snyder, and Mark Hansen)
- 2010 “Constituents’ Responses to Congressional Roll Call Voting,” *American Journal of Political Science* (with Phil Jones)
- 2010 “Race, Region, and Vote Choice in the 2008 Election: Implications for the Future of the Voting Rights Act” *Harvard Law Review* April, 2010. (with Nathaniel Persily, and Charles H. Stewart III)
- 2010 “Residential Mobility and the Cell Only Population,” *Public Opinion Quarterly* (with Brian Schaffner)
- 2009 “Explaining Attitudes Toward Power Plant Location,” *Public Opinion Quarterly* (with David Konisky)

- 2009 “Public risk perspectives on the geologic storage of carbon dioxide,” *International Journal of Greenhouse Gas Control* (with Gregory Singleton and Howard Herzog) 3(1): 100-107.
- 2008 “A Spatial Model of the Relationship Between Seats and Votes” (with William Leblanc) *Mathematical and Computer Modeling* (November).
- 2008 “The Strength of Issues: Using Multiple Measures to Gauge Preference Stability, Ideological Constraint, and Issue Voting” (with Jonathan Rodden and James M. Snyder, Jr.) *American Political Science Review* (May).
- 2008 “Access versus Integrity in Voter Identification Requirements.” *New York University Annual Survey of American Law*, vol 63.
- 2008 “Voter Fraud in the Eye of the Beholder” (with Nathaniel Persily) *Harvard Law Review* (May)
- 2007 “Incumbency Advantages in U. S. Primary Elections,” (with John Mark Hansen, Shigeo Hirano, and James M. Snyder, Jr.) *Electoral Studies* (September)
- 2007 “Television and the Incumbency Advantage” (with Erik C. Snowberg and James M. Snyder, Jr.) *Legislative Studies Quarterly*.
- 2006 “The Political Orientation of Newspaper Endorsements” (with Rebecca Lessem and James M. Snyder, Jr.). *Quarterly Journal of Political Science* vol. 1, issue 3.
- 2006 “Voting Cues and the Incumbency Advantage: A Critical Test” (with Shigeo Hirano, James M. Snyder, Jr., and Michiko Ueda) *Quarterly Journal of Political Science* vol. 1, issue 2.
- 2006 “American Exceptionalism? Similarities and Differences in National Attitudes Toward Energy Policies and Global Warming” (with David Reiner, Howard Herzog, K. Itaoka, M. Odenberger, and Phillip Johanssen) *Environmental Science and Technology* (February 22, 2006), [http://pubs3.acs.org/acs/journals/doi/lookup?in\\_doi=10.1021/es052010b](http://pubs3.acs.org/acs/journals/doi/lookup?in_doi=10.1021/es052010b)
- 2006 “Purple America” (with Jonathan Rodden and James M. Snyder, Jr.) *Journal of Economic Perspectives* (Winter).
- 2005 “Did the Introduction of Voter Registration Decrease Turnout?” (with David Konisky). *Political Analysis*.
- 2005 “Statistical Bias in Newspaper Reporting: The Case of Campaign Finance”

- Public Opinion Quarterly* (with James M. Snyder, Jr., and Erik Snowberg).
- 2005 “Studying Elections” *Policy Studies Journal* (with Charles H. Stewart III and R. Michael Alvarez).
- 2005 “Legislative Bargaining under Weighted Voting” *American Economic Review* (with James M. Snyder, Jr., and Michael Ting)
- 2005 “Voting Weights and Formateur Advantages in Coalition Formation: Evidence from Parliamentary Coalitions, 1946 to 2002” (with James M. Snyder, Jr., Aaron B. Strauss, and Michael M. Ting) *American Journal of Political Science*.
- 2005 “Reapportionment and Party Realignment in the American States” *Pennsylvania Law Review* (with James M. Snyder, Jr.)
- 2004 “Residual Votes Attributable to Voting Technologies” (with Charles Stewart) *Journal of Politics*
- 2004 “Using Term Limits to Estimate Incumbency Advantages When Office Holders Retire Strategically” (with James M. Snyder, Jr.). *Legislative Studies Quarterly* vol. 29, November 2004, pages 487-516.
- 2004 “Did Firms Profit From Soft Money?” (with James M. Snyder, Jr., and Michiko Ueda) *Election Law Journal* vol. 3, April 2004.
- 2003 “Bargaining in Bicameral Legislatures” (with James M. Snyder, Jr. and Mike Ting) *American Political Science Review*, August, 2003.
- 2003 “Why Is There So Little Money in U.S. Politics?” (with James M. Snyder, Jr.) *Journal of Economic Perspectives*, Winter, 2003.
- 2002 “Equal Votes, Equal Money: Court-Ordered Redistricting and the Public Spending in the American States” (with Alan Gerber and James M. Snyder, Jr.) *American Political Science Review*, December, 2002.  
Paper awarded the Heinz Eulau award for the best paper in the American Political Science Review.
- 2002 “Are PAC Contributions and Lobbying Linked?” (with James M. Snyder, Jr. and Micky Tripathi) *Business and Politics* 4, no. 2.
- 2002 “The Incumbency Advantage in U.S. Elections: An Analysis of State and Federal Offices, 1942-2000” (with James Snyder) *Election Law Journal*, 1, no. 3.
- 2001 “Voting Machines, Race, and Equal Protection.” *Election Law Journal*, vol. 1,



no. 1

- 2001 “Models, assumptions, and model checking in ecological regressions” (with Andrew Gelman, David Park, Phillip Price, and Lorraine Minnite) *Journal of the Royal Statistical Society*, series A, 164: 101-118.
- 2001 “The Effects of Party and Preferences on Congressional Roll Call Voting.” (with James Snyder and Charles Stewart) *Legislative Studies Quarterly* (forthcoming).  
Paper awarded the *Jewell-Lowenberg Award* for the best paper published on legislative politics in 2001. Paper awarded the *Jack Walker Award* for the best paper published on party politics in 2001.
- 2001 “Candidate Positions in Congressional Elections,” (with James Snyder and Charles Stewart). *American Journal of Political Science* 45 (November).
- 2000 “Old Voters, New Voters, and the Personal Vote,” (with James Snyder and Charles Stewart) *American Journal of Political Science* 44 (February).
- 2000 “Soft Money, Hard Money, Strong Parties,” (with James Snyder) *Columbia Law Review* 100 (April):598 - 619.
- 2000 “Campaign War Chests and Congressional Elections,” (with James Snyder) *Business and Politics*. 2 (April): 9-34.
- 1999 “Replicating Experiments Using Surveys and Aggregate Data: The Case of Negative Advertising.” (with Shanto Iyengar and Adam Simon) *American Political Science Review* 93 (December).
- 1999 “Valence Politics and Equilibrium in Spatial Models,” (with James Snyder), *Public Choice*.
- 1999 “Money and Institutional Power,” (with James Snyder), *Texas Law Review* 77 (June, 1999): 1673-1704.
- 1997 “Incumbency Advantage and the Persistence of Legislative Majorities,” (with Alan Gerber), *Legislative Studies Quarterly* 22 (May 1997).
- 1996 “The Effects of Ballot Access Rules on U.S. House Elections,” (with Alan Gerber), *Legislative Studies Quarterly* 21 (May 1996).
- 1994 “Riding the Wave and Issue Ownership: The Importance of Issues in Political Advertising and News,” (with Shanto Iyengar) *Public Opinion Quarterly* 58: 335-357.

- 1994 “Horseshoes and Horseraces: Experimental Evidence of the Effects of Polls on Campaigns,” (with Shanto Iyengar) *Political Communications* 11/4 (October-December): 413-429.
- 1994 “Does Attack Advertising Demobilize the Electorate?” (with Shanto Iyengar), *American Political Science Review* 89 (December).
- 1994 “The Mismeasure of Campaign Spending: Evidence from the 1990 U.S. House Elections,” (with Alan Gerber) *Journal of Politics* 56 (September).
- 1993 “Poll Faulting,” (with Thomas R. Belin) *Chance* 6 (Winter): 22-28.
- 1991 “The Vanishing Marginals and Electoral Responsiveness,” (with David Brady and Morris Fiorina) *British Journal of Political Science* 22 (November): 21-38.
- 1991 “Mass Media and Elections: An Overview,” (with Roy Behr and Shanto Iyengar) *American Politics Quarterly* 19/1 (January): 109-139.
- 1990 “The Limits of Unraveling in Interest Groups,” *Rationality and Society* 2: 394-400.
- 1990 “Measuring the Consequences of Delegate Selection Rules in Presidential Nominations,” (with Gary King) *Journal of Politics* 52: 609-621.
- 1989 “The Nature of Utility Functions in Mass Publics,” (with Henry Brady) *American Political Science Review* 83: 143-164.

### ***Special Reports and Policy Studies***

- 2010 *The Future of Nuclear Power*, Revised.
- 2006 *The Future of Coal*. MIT Press. Continued reliance on coal as a primary power source will lead to very high concentrations of carbon dioxide in the atmosphere, resulting in global warming. This cross-disciplinary study – drawing on faculty from Physics, Economics, Chemistry, Nuclear Engineering, and Political Science – develop a road map for technology research and development policy in order to address the challenges of carbon emissions from expanding use of coal for electricity and heating throughout the world.
- 2003 *The Future of Nuclear Power*. MIT Press. This cross-disciplinary study – drawing on faculty from Physics, Economics, Chemistry, Nuclear Engineering, and Political Science – examines the what contribution nuclear power can make to

meet growing electricity demand, especially in a world with increasing carbon dioxide emissions from fossil fuel power plants.

- 2002 “Election Day Registration.” A report prepared for DEMOS. This report analyzes the possible effects of Proposition 52 in California based on the experiences of 6 states with election day registration.
- 2001 *Voting: What Is, What Could Be.* A report of the Caltech/MIT Voting Technology Project. This report examines the voting system, especially technologies for casting and counting votes, registration systems, and polling place operations, in the United States. It was widely used by state and national governments in formulating election reforms following the 2000 election.
- 2001 “An Assessment of the Reliability of Voting Technologies.” A report of the Caltech/MIT Voting Technology Project. This report provided the first nationwide assessment of voting equipment performance in the United States. It was prepared for the Governor’s Select Task Force on Election Reform in Florida.

#### *Chapters in Edited Volumes*

- 2016 “Taking the Study of Public Opinion Online” (with Brian Schaffner) *Oxford Handbook of Public Opinion*, R. Michael Alvarez, ed. Oxford University Press: New York, NY.
- 2014 “Voter Registration: The Process and Quality of Lists” *The Measure of American Elections*, Barry Burden, ed..
- 2012 “Using Recounts to Measure the Accuracy of Vote Tabulations: Evidence from New Hampshire Elections, 1946-2002” in *Confirming Elections*, R. Michael Alvarez, Lonna Atkeson, and Thad Hall, eds. New York: Palgrave, Macmillan.
- 2010 “Dyadic Representation” in *Oxford Handbook on Congress*, Eric Schickler, ed., Oxford University Press.
- 2008 “Voting Technology and Election Law” in *America Votes!*, Benjamin Griffith, editor, Washington, DC: American Bar Association.
- 2007 “What Did the Direct Primary Do to Party Loyalty in Congress” (with Shigeo Hirano and James M. Snyder Jr.) in *Process, Party and Policy Making: Further New Perspectives on the History of Congress*, David Brady and Matthew D. McCubbins (eds.), Stanford University Press, 2007.
- 2007 “Election Administration and Voting Rights” in *Renewal of the Voting*

*Rights Act*, David Epstein and Sharyn O'Hallaran, eds. Russell Sage Foundation.

- 2006 “The Decline of Competition in Primary Elections,” (with John Mark Hansen, Shigeo Hirano, and James M. Snyder, Jr.) *The Marketplace of Democracy*, Michael P. McDonald and John Samples, eds. Washington, DC: Brookings.
- 2005 “Voters, Candidates and Parties” in *Handbook of Political Economy*, Barry Weingast and Donald Wittman, eds. New York: Oxford University Press.
- 2003 “Baker v. Carr in Context, 1946 – 1964” (with Samuel Isaacharoff) in *Constitutional Cases in Context*, Michael Dorf, editor. New York: Foundation Press.
- 2002 “Corruption and the Growth of Campaign Spending”(with Alan Gerber and James Snyder). *A User's Guide to Campaign Finance*, Jerry Lubenow, editor. Rowman and Littlefield.
- 2001 “The Paradox of Minimal Effects,” in Henry Brady and Richard Johnston, eds., *Do Campaigns Matter?* University of Michigan Press.
- 2001 “Campaigns as Experiments,” in Henry Brady and Richard Johnson, eds., *Do Campaigns Matter?* University of Michigan Press.
- 2000 “Money and Office,” (with James Snyder) in David Brady and John Cogan, eds., *Congressional Elections: Continuity and Change*. Stanford University Press.
- 1996 “The Science of Political Advertising,” (with Shanto Iyengar) in *Political Persuasion and Attitude Change*, Richard Brody, Diana Mutz, and Paul Sniderman, eds. Ann Arbor, MI: University of Michigan Press.
- 1995 “Evolving Perspectives on the Effects of Campaign Communication,” in Philo Warburn, ed., *Research in Political Sociology*, vol. 7, JAI.
- 1995 “The Effectiveness of Campaign Advertising: It's All in the Context,” (with Shanto Iyengar) in *Campaigns and Elections American Style*, Candice Nelson and James A. Thurber, eds. Westview Press.
- 1993 “Information and Electoral Attitudes: A Case of Judgment Under Uncertainty,” (with Shanto Iyengar), in *Explorations in Political Psychology*, Shanto Iyengar and William McGuire, eds. Durham: Duke University Press.

### ***Working Papers***

- 2009 “Sociotropic Voting and the Media” (with Marc Meredith and Erik Snowberg), American National Election Study Pilot Study Reports, John Aldrich editor.

- 2007 “Public Attitudes Toward America’s Energy Options: Report of the 2007 MIT Energy Survey” CEEPR Working Paper 07-002 and CANES working paper.
- 2006 ["Constituents' Policy Perceptions and Approval of Members' of Congress" CCES Working Paper 06-01](#) (with Phil Jones).
- 2004 “Using Recounts to Measure the Accuracy of Vote Tabulations: Evidence from New Hampshire Elections, 1946 to 2002” (with Andrew Reeves).
- 2002 “Evidence of Virtual Representation: Reapportionment in California,” (with Ruimin He and James M. Snyder).
- 1999 “Why did a majority of Californians vote to lower their own power?” (with James Snyder and Jonathan Woon). Paper presented at the annual meeting of the American Political Science Association, Atlanta, GA, September, 1999. Paper received the award for the best paper on Representation at the 1999 Annual Meeting of the APSA.
- 1999 “Has Television Increased the Cost of Campaigns?” (with Alan Gerber and James Snyder).
- 1996 “Money, Elections, and Candidate Quality,” (with James Snyder).
- 1996 “Party Platform Choice - Single- Member District and Party-List Systems,”(with James Snyder).
- 1995 “Messages Forgotten” (with Shanto Iyengar).
- 1994 “Consumer Contributors and the Returns to Fundraising: A Microeconomic Analysis,” (with Alan Gerber), presented at the Annual Meeting of the American Political Science Association, September.
- 1992 “Biases in Ecological Regression,” (with R. Douglas Rivers) August, (revised February 1994). Presented at the Midwest Political Science Association Meetings, April 1994, Chicago, IL.
- 1992 “Using Aggregate Data to Correct Nonresponse and Misreporting in Surveys” (with R. Douglas Rivers). Presented at the annual meeting of the Political Methodology Group, Cambridge, Massachusetts, July.
- 1991 “The Electoral Effects of Issues and Attacks in Campaign Advertising” (with Shanto Iyengar). Presented at the Annual Meeting of the American Political Science Association, Washington, DC.

- 1991 “Television Advertising as Campaign Strategy: Some Experimental Evidence” (with Shanto Iyengar). Presented at the Annual Meeting of the American Association for Public Opinion Research, Phoenix.
- 1991 “Why Candidates Attack: Effects of Televised Advertising in the 1990 California Gubernatorial Campaign,” (with Shanto Iyengar). Presented at the Annual Meeting of the Western Political Science Association, Seattle, March.
- 1990 “Winning is Easy, But It Sure Ain’t Cheap.” Working Paper #90-4, Center for the American Politics and Public Policy, UCLA. Presented at the Political Science Departments at Rochester University and the University of Chicago.

### *Research Grants*

- 1989-1990 Markle Foundation. “A Study of the Effects of Advertising in the 1990 California Gubernatorial Campaign.” Amount: \$50,000
- 1991-1993 Markle Foundation. “An Experimental Study of the Effects of Campaign Advertising.” Amount: \$150,000
- 1991-1993 NSF. “An Experimental Study of the Effects of Advertising in the 1992 California Senate Electoral.” Amount: \$100,000
- 1994-1995 MIT Provost Fund. “Money in Elections: A Study of the Effects of Money on Electoral Competition.” Amount: \$40,000
- 1996-1997 National Science Foundation. “Campaign Finance and Political Representation.” Amount: \$50,000
- 1997 National Science Foundation. “Party Platforms: A Theoretical Investigation of Party Competition Through Platform Choice.” Amount: \$40,000
- 1997-1998 National Science Foundation. “The Legislative Connection in Congressional Campaign Finance. Amount: \$150,000
- 1999-2000 MIT Provost Fund. “Districting and Representation.” Amount: \$20,000.
- 1999-2002 Sloan Foundation. “Congressional Staff Seminar.” Amount: \$156,000.
- 2000-2001 Carnegie Corporation. “The Caltech/MIT Voting Technology Project.” Amount: \$253,000.
- 2001-2002 Carnegie Corporation. “Dissemination of Voting Technology Information.”

	Amount: \$200,000.
2003-2005	National Science Foundation. “State Elections Data Project.” Amount: \$256,000.
2003-2004	Carnegie Corporation. “Internet Voting.” Amount: \$279,000.
2003-2005	Knight Foundation. “Accessibility and Security of Voting Systems.” Amount: \$450,000.
2006-2008	National Science Foundation, “Primary Election Data Project,” \$186,000
2008-2009	Pew/JEHT. “Measuring Voting Problems in Primary Elections, A National Survey.” Amount: \$300,000
2008-2009	Pew/JEHT. “Comprehensive Assessment of the Quality of Voter Registration Lists in the United States: A pilot study proposal” (with Alan Gerber). Amount: \$100,000.
2010-2011	National Science Foundation, “Cooperative Congressional Election Study,” \$360,000
2010-2012	Sloan Foundation, “Precinct-Level U. S. Election Data,” \$240,000.
2012-2014	National Science Foundation, “Cooperative Congressional Election Study, 2010-2012 Panel Study” \$425,000
2012-2014	National Science Foundation, “2012 Cooperative Congressional Election Study,” \$475,000
2014-2016	National Science Foundation, “Cooperative Congressional Election Study, 2010-2014 Panel Study” \$510,000
2014-2016	National Science Foundation, “2014 Cooperative Congressional Election Study,” \$400,000
2016-2018	National Science Foundation, “2016 Cooperative Congressional Election Study,” \$485,000
2018-2020	National Science Foundation, “2018 Cooperative Congressional Election Study,” \$844,784.

***Professional Boards***

Editor, Cambridge University Press Book Series, Political Economy of Institutions and Decisions, 2006-present

Member, Board of the Reuters International School of Journalism, Oxford University, 2007 to present.

Member, Academic Advisory Board, Electoral Integrity Project, 2012 to present.

Contributing Editor, *Boston Review*, The State of the Nation.

Member, Board of Overseers, American National Election Studies, 1999 - 2013.

Associate Editor, Public Opinion Quarterly, 2012 to 2013.

Editorial Board of American Journal of Political Science, 2005 to present.

Editorial Board of Legislative Studies Quarterly, 2005 to present.

Editorial Board of Public Opinion Quarterly, 2006 to present.

Editorial Board of the Election Law Journal, 2002 to present.

Editorial Board of the Harvard International Journal of Press/Politics, 1996 to 2008.

Editorial Board of Business and Politics, 2002 to Present.

Scientific Advisory Board, Polimetrix, 2004 to 2006.

***Special Projects and Task Forces***

Principal Investigator, Cooperative Congressional Election Study, 2005 – present.

CBS News Election Decision Desk, 2006-present

Co-Director, Caltech/MIT Voting Technology Project, 2000-2004.

Co-Organizer, MIT Seminar for Senior Congressional and Executive Staff, 1996-2007.

MIT Energy Innovation Study, 2009-2010.

MIT Energy Initiative, Steering Council, 2007-2008

MIT Coal Study, 2004-2006.

MIT Energy Research Council, 2005-2006.

MIT Nuclear Study, 2002-2004.

Harvard University Center on the Environment, Council, 2009-present

**Expert Witness, Consultation, and Testimony**

2001            Testimony on Election Administration, U. S. Senate Committee on Commerce.



- 2001 Testimony on Voting Equipment, U.S. House Committee on Science, Space, and Technology
- 2001 Testimony on Voting Equipment, U.S. House Committee on House Administration
- 2001 Testimony on Voting Equipment, Congressional Black Caucus
- 2002-2003 *McConnell v. FEC*, 540 U.S. 93 (2003), consultant to the Brennan Center.
- 2009 Amicus curiae brief with Professors Nathaniel Persily and Charles Stewart on behalf of neither party to the U.S. Supreme Court in the case of *Northwest Austin Municipal Utility District Number One v. Holder*, 557 U.S. 193 (2009).
- 2009 Testimony on Voter Registration, U. S. Senate Committee on Rules.
- 2011-2015 *Perez v. Perry*, U. S. District Court in the Western District of Texas (No. 5:11-cv-00360). Exert witness on behalf of Rodriguez intervenors.
- 2011-2013 *State of Texas v. United States*, the U.S. District Court in the District of Columbia (No. 1:11-cv-01303), expert witness on behalf of the Gonzales intervenors.
- 2012-2013 *State of Texas v. Holder*, U.S. District Court in the District of Columbia (No. 1:12-cv-00128), expert witness on behalf of the United States.
- 2011-2012 *Guy v. Miller* in U.S. District Court for Nevada (No. 11-OC-00042-1B), expert witness on behalf of the Guy plaintiffs.
- 2012 *In re Senate Joint Resolution of Legislative Apportionment*, Florida Supreme Court (Nos. 2012-CA-412, 2012-CA-490), consultant for the Florida Democratic Party.
- 2012-2014 *Romo v. Detzner*, Circuit Court of the Second Judicial Circuit in Florida (No. 2012 CA 412), expert witness on behalf of Romo plaintiffs.
- 2013-2014 *LULAC v. Edwards Aquifer Authority*, U.S. District Court for the Western District of Texas, San Antonio Division (No. 5:12cv620-OLG,), consultant and expert witness on behalf of the City of San Antonio and San Antonio Water District
- 2013-2014 *Veasey v. Perry*, U. S. District Court for the Southern District of Texas, Corpus Christi Division (No. 2:13-cv-00193), consultant and expert witness on behalf of the United States Department of Justice.
- 2013-2015 *Harris v. McCrory*, U. S. District Court for the Middle District of North Carolina (No. 1:2013cv00949), consultant and expert witness on behalf of the Harris plaintiffs. (later named *Cooper v. Harris*)
- 2014 Amicus curiae brief, on behalf of neither party, Supreme Court of the United States, *Alabama Democratic Conference v. State of Alabama*.
- 2014- 2016 *Bethune-Hill v. Virginia State Board of Elections*, U. S. District Court for the Eastern District of Virginia (No. 3:2014cv00852), consultant and expert on behalf of the Bethune-Hill plaintiffs.
- 2015 Amicus curiae brief in support of Appellees, Supreme Court of the United States, *Evenwell v. Abbott*
- 2016-2017 *Perez v. Abbott*, U. S. District Court in the Western District of Texas (No. 5:11-cv-00360). Exert witness on behalf of Rodriguez intervenors.
- 2017-2018 *Fish v. Kobach*, U. S. District Court in the District of Kansas (No. 2:16-cv-02105-JAR). Expert witness of behalf of the Fish plaintiffs.