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CITATION
THE STATE OF TEXAS
CAUSE NO. D-1-GN-25-010071

SHANNON HUGGINS; LARS KUSLICH; JOSE SILVESTER , PLAINTIFF(S)

vs.

JANE NELSON TEXAS SECRETARY OF STATE , DEFENDANT(S)

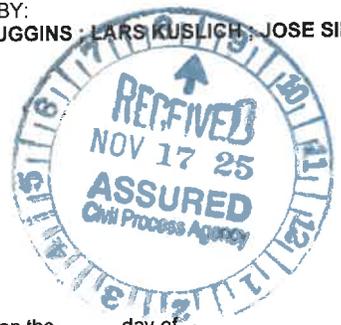
TO: JANE NELSON TEXAS SECRETARY OF STATE
1019 BRAZOS STREET ROOM 105
AUSTIN TX 78701

Defendant, in the above styled and numbered cause:
YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A.M. of the 20th day after the date you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org."

Attached is a copy of the **CONTESTANT'S PETITION ASSERTING AN ELECTION CONTEST** in the above styled and numbered cause, which was filed on **NOVEMBER 13, 2025** in the **455TH DISTRICT COURT** of Travis County, Austin, Texas.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office, **NOVEMBER 14, 2025**

REQUESTED BY:
SHANNON HUGGINS; LARS KUSLICH; JOSE SILVESTER
;;



[Signature]

Velva L Price
Travis County District Clerk
Civil Family Court Facility (CFCF)
1700 Guadalupe Street, P.O. Box 679003 (78767)
Austin TX 78701

Rosa Oneal, Deputy

RETURN

Came to hand on the ____ day of _____, _____ at _____ o'clock ____ M., and executed at _____ within the County of _____ on the ____ day of _____, _____, at _____ o'clock ____ M., by delivering to the within named _____, each in person, a true copy of this citation together with the **CONTESTANT'S PETITION ASSERTING AN ELECTION CONTEST** accompanying pleading, having first attached such copy of such citation to such copy of pleading and endorsed on such copy of citation the date of delivery.

Service Fee: \$ _____

Sheriff / Constable / Authorized Person

Sworn to and subscribed before me this the ____ day of _____, _____.

By: _____

Printed Name of Server

County, Texas

Notary Public, THE STATE OF TEXAS
D-1-GN-25-010071

SERVICE FEE NOT PAID

SEC OF STATE-RECEIVED
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386381

D-1-GN-25-010071

NO. _____

SHANNON HUGGINS, LARS	§	IN THE DISTRICT COURT
KUSLICH and JOSE	§	
SILVESTER	§	
CONTESTANTS	§	
	§	
v.	§	TRAVIS COUNTY, TEXAS
	§	
JANE NELSON, IN HER	§	
OFFICIAL CAPACITY	§	455TH, DISTRICT COURT
CONTESTEE	§	____ JUDICIAL DISTRICT

CONTESTANTS' PETITION ASSERTING AN
ELECTION CONTEST

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Shannon Huggins, Jose Silvester and Lars Kuslich, Contestants, and qualified voters of the State of Texas, residing in Burleson, Comal and Liberty County, files this Petition Asserting an Election Contest pursuant to Chapter 233 of the Texas Election Code, contesting the results of the statewide Constitutional Amendment Election held on November 4, 2025, regarding **Proposition 14** (SJR 3, establishment of the Dementia Prevention and Research Institute of Texas). Contestants seek to void the canvass and order a new election under Tex. Elec. Code §§ 221.012(b), 233.011, as non-compliant voting systems in 252 counties rendered votes illegal (Tex. Elec. Code § 221.003(b)), exceeding the margin and making the outcome unascertainable (Tex. Elec. Code § 221.003(a)(1)). In support thereof, Contestants would respectfully show the following:

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I. Jurisdiction and Venue

This Court has exclusive original jurisdiction under and Tex. Elec. Code § 221.002(a). Venue is mandatory in Travis County as the contest involves a statewide measure, and the SOS is a party. Tex. Elec. Code § 233.005(1).

II. Discovery Control Plan

Pursuant to Tex. Elec. Code § 221.008 and as permitted by the Tex. R Civ. Proc. 190.4, discover is intended to be conducted under Level 3 due to the timeframe and complexity of the material. Contestants will file a motion asking that the Court enter an order setting forth a suitable discovery control plan.

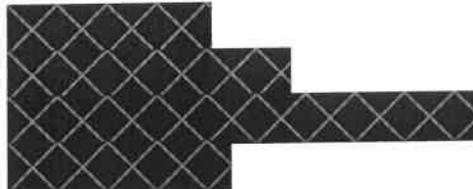
III. Parties

Contestants:

Shannon Huggins



Lars Kuslich



Jose Silvester



Pro Se Contestants

Contestee:

Jane Nelson, in her official capacity as Secretary of State of the State of Texas

Contestee may be served through personal service at:

Service of Process
Secretary of State
James E. Rudder Building
1019 Brazos, Room 105
Austin, Texas 78701

IV. Summary of the Case

Contestants, qualified Texas voters from Burleson, Comal, and Liberty Counties, challenge the passage of Proposition 14 (SJR 3, establishing the Dementia Prevention and Research Institute of Texas with \$3 billion in general revenue funding). The unofficial statewide canvass as of November 5, 2025, reports 2,016,281 YES votes and 924,001 NO votes (100% precincts reporting), a margin of 1,092,280 votes (EXHIBIT A). See Texas Secretary of State, *Texas Election Results*, <https://goelect.txelections.civixapps.com/ivis-enr-ui/races> (last visited November 5, 2025) .This result is invalid because

"illegal votes" cast in 252 counties using non-compliant systems far exceed this margin, **rendering the true outcome unascertainable.** Tex. Elec. Code §§ 221.003(a)(1), 1.0015.

An "illegal vote" is any vote not legally countable (Tex. Elec. Code § 221.003(b)). Contestants assert that every ballot cast or tabulated on a non-compliant or illegally deployed voting system is illegal. **Election Systems & Software (ES&S) and Hart InterCivic systems, used in 252 of 254 counties, were not tested by a properly accredited Voting System Test Laboratory (VSTL) in compliance with:**

- Help America Vote Act (HAVA) § 231(b) (52 U.S.C. § 20971);
- Election Assistance Commission (EAC) Voluntary Voting System Guidelines (VVSG);
- Tex. Elec. Code § 122.001(a)(3) (requiring EAC-compliant standards);
- Tex. Admin. Code §§ 81.60, 81.61 (mandating accredited VSTL reports and source-code delivery).

Only Collingsworth and Kent Counties (known to Contestants), used compliant hand-counted paper ballots; all others deployed non-conforming

systems. Thus, **illegal votes exceed the margin of victory, materially affecting the result.**

Immediate Relief Required:

- Preserve under seal every memory card, USB drive, audit log, and ballot image from all 254 counties;
- Compel the Secretary of State to produce: (i) current VSTL accreditation certificates with EAC Chair signatures and effective dates; (ii) full testing reports; and (iii) source-code escrow agreements;
- Declare all votes cast or tabulated on non-conforming systems illegal and uncountable under Tex. Elec. Code § 221.003(b);
- Subtract all votes cast or tabulated on non-conforming systems from the final tally, void canvass if unascertainable (Tex. Elec. Code § 221.012(b));
- Direct the appropriate authority to order a new election barring non-compliant systems (Tex. Elec. Code § 233.011)

Absent valid, current VSTL accreditations signed by the EAC Chair for systems used on November 4, 2025, the Court must declare the election for Proposition 14 void (Tex. Elec. Code § 233.014(f)).

V. Sovereign Immunity

Contestants sue Contestee solely in her official capacity for ultra vires acts (approving non-compliant systems), in violation of mandatory duties under Tex. Elec. Code §§ 122.001(a)(3), 122.031–122.038, and seek only prospective injunctive relief. **Sovereign immunity is waived or inapplicable.** See *Fed. Sign v. Tex. S. Univ.*, 951 S.W.2d 401 (Tex. 1997). Tex. Elec. Code § 233.003 implies waiver, as contests against the Secretary would otherwise be meaningless. *Nazari v. State*, 561 S.W.3d 495 (Tex. 2018). (The legislature may waive the state's sovereign immunity by statute); *Wichita Falls State Hosp. v. Taylor*, 106 S.W.3d 692 (Tex. 2003). (If the Legislature requires that the State be joined in a lawsuit for which immunity would otherwise attach, the Legislature has intentionally waived the State's sovereign immunity). No immunity bars injunctive relief against unconstitutional elections. *Ex parte Young*, 209 U.S. 123 (1908).

Under the Ultra Vires Exception, a suit against a state official for acting without legal authority or failing to perform a purely ministerial act is not a suit against the State and is not barred by immunity. *City of El Paso v. Heinrich*, 284 S.W.3d 366, 372 (Tex. 2009) (“[A]ctions to compel a public official to comply with statutory duties are not prohibited by sovereign

immunity.”); *Tex. Dep’t of Transp. v. Sefzik*, 355 S.W.3d 618, 621 (Tex. 2011) (ultra vires suits require no legislative permission). The SOS's approval of non-compliant systems since HB 2900 (2015) is ultra vires, as shown by persistent VSTL deficiencies notified to SOS for over 3 years via lawsuits.

The Secretary of State’s duty is ministerial, requiring approval only for EAC-compliant voting systems under Tex. Elec. Code § 122.001(a)(3) and authorizing the pursuit of injunctions to prevent the use of unapproved equipment under Tex. Elec. Code § 122.038. Approving or allowing non-compliant systems constitutes an ultra vires act, as it contravenes clear statutory mandates. As held in *Houston Belt & Terminal Ry. Co. v. City of Houston*, 487 S.W.3d 154, 161 (Tex. 2016), official actions that contradict explicit statutory requirements are ultra vires.

Even if state immunity were asserted, prospective injunctive relief to halt ongoing constitutional violations, such as those involving equal protection and due process, is permitted under the *Ex parte Young* doctrine, which serves as a federal analogue in these contexts. As articulated in *Ex parte Young*, 209 U.S. 123, 159–60 (1908), this exception enables lawsuits against state officials to enforce federal rights without implicating

sovereign immunity barriers. Furthermore, *Verizon Md., Inc. v. Pub. Serv. Comm'n of Md.*, 535 U.S. 635, 645 (2002), extends the doctrine's applicability to state law claims raised in cases invoking federal question jurisdiction.

No immunity bars this action. Contestants seek only to compel compliance with law and enjoin illegal certification, relief this Court is empowered to grant.

VI. Standing

Contestants Shannon Huggins, Jose Silvester, and Lars Kuslich are qualified voters residing in Burleson, Comal, and Liberty Counties, Texas, who voted in the November 4, 2025, constitutional amendment election using non-compliant voting machines, rendering their votes illegal under Tex. Elec. Code § 221.003(b). They have standing under Tex. Elec. Code § 233.002 and Article III standing due to concrete, particularized, and redressable injuries.

Under the doctrine of vote nullification and illegal ballots, Contestants were compelled to cast their votes on non-compliant ES&S and Hart InterCivic systems, in direct violation of Tex. Elec. Code § 122.001(a)(3), rendering those votes presumptively illegal and eligible for

exclusion pursuant to Tex. Elec. Code § 221.003(b). In contrast, voters in Collingsworth and Kent Counties utilized legal hand-counted ballots, highlighting a disparity in electoral processes. This coercive imposition effectively nullifies Contestants' votes, stripping them of meaningful participation in the democratic process, as unequal treatment in vote counting infringes upon equal protection and due process rights, as established in *Bush v. Gore*, 531 U.S. 98, 104–05 (2000).

Under the principles of vote dilution and disparate impact, illegal votes cast in 252 counties, far exceeding the 1,092,280-vote margin for Proposition 14, dilute the weight of Contestants' votes and disproportionately burden voters in machine-reliant counties by compelling them to either cast an illegal vote or abstain from participating altogether, whereas voters in counties using hand-counted paper ballots are provided the opportunity to cast legal ballots. As recognized in *Andrade v. NAACP of Austin*, 345 S.W.3d 1, 10–11 (Tex. 2011), voters possess standing to challenge electoral systems that cause dilution or disparate impact. Similarly, *Shelby County v. Holder*, 570 U.S. 529, 542–43 (2013), affirms that unequal voting systems inflict cognizable injuries, and *Thornburg v. Gingles*,

478 U.S. 30, 51 (1986), establishes that vote dilution is actionable based on the totality of circumstances.

Under the doctrines of procedural and substantive due process, Contestants were denied a fair and reliable opportunity to cast a legal vote due to the use of non-compliant voting systems, thereby violating their procedural due process rights protected by the Fourteenth Amendment. Furthermore, the imposed burden on the fundamental right to vote lacks any rational basis, necessitating the application of strict scrutiny under the Anderson-Burdick test. As established in *Anderson v. Celebrezze*, 460 U.S. 780, 789 (1983), such restrictions on voting rights must be rigorously evaluated to ensure they do not unduly infringe upon constitutional protections.

The imposition of non-compliant voting systems creates First Amendment and Texas Constitutional violations by forcing voters into a Hobson's choice: either cast an illegal vote on non-compliant machines or abstain from participating altogether, thereby chilling associational and expressive rights under the First Amendment and abridging the privilege of free suffrage as protected by Texas Constitution Article VI, §§ 2 and 4. As

affirmed in *Gill v. Whitford*, 585 U.S. 48 (2018), voters who allege specific facts demonstrating personal disadvantage possess Article III standing to challenge such burdens on their electoral rights. The imposition of this Hobson's choice also forfeits meaningful participation in Texas's republican form of government, as guaranteed by Texas Constitution Article I, § 2, and United States Constitution Article IV, § 4.

As Texas taxpayers, Contestants suffer a distinct injury from the \$3 billion diversion of general revenue triggered by Proposition 14's passage through illegal votes, constituting an ultra vires expenditure that they have standing to challenge. In *City of San Antonio v. City of Boerne*, 111 S.W.3d 22, 25 (Tex. 2003), the court affirmed taxpayer standing to contest illegal expenditures. Additionally, *Tex. Ass'n of Bus. v. Tex. Air Control Bd.*, 852 S.W.2d 440, 444 (Tex. 1993), recognizes that taxpayers may sue to prevent ultra vires acts that waste public funds.

These injuries are **traceable** to Contestee's failure to enforce certification and **redressable** by voiding the results and ordering the proper authorities to call a new election using legal voting systems (Tex. Elec. Code §§ 233.011, 233.014(f)). These injuries are ongoing and will recur in every

future election utilizing non-compliant voting systems unless redressed by this Court, satisfying the requirements for prospective injunctive relief and Article III standing under precedents like *Friends of the Earth, Inc. v. Laidlaw Environmental Services (TOC), Inc.*, 528 U.S. 167, 185-86 (2000) (ongoing violations support standing where harm is capable of repetition yet evading review).

VII. The Facts and Law of this Case

The November 4, 2025, constitutional amendment election was conducted using Election Systems & Software (ES&S) and Hart InterCivic electronic voting systems in 252 of 254 Texas counties, systems that do not comply with federal certification laws under HAVA and Texas election and administrative law. Only Collingsworth (EXHIBIT B) and Kent (EXHIBIT C) Counties used compliant hand-counted paper ballots and contributed only 408 votes combined out of the 2,940,282 votes cast for Proposition 14 (EXHIBIT D, E). See Texas Secretary of State, *Texas Election Results*, [https://goelect.txelections.civixapps.com/ivis-enr-ui/contestdetails?officeID=100&officeName=PROPOSITION%2014%20\(SJR%203\)&officeType=STATEWIDE%20PROPOSITIONS&from=race](https://goelect.txelections.civixapps.com/ivis-enr-ui/contestdetails?officeID=100&officeName=PROPOSITION%2014%20(SJR%203)&officeType=STATEWIDE%20PROPOSITIONS&from=race) (last

visited November 5, 2025). Every ballot cast or tabulated on non-compliant electronic systems is an "illegal vote" not legally countable (Tex. Elec. Code § 221.003(b)), exceeding the 1,092,280-vote margin for Proposition 14 and rendering the true outcome unascertainable (Tex. Elec. Code § 221.003(a)(1)). *Green v. Reyes*, 836 S.W.2d 203, 205 (Tex. App. 1992) (election voided because the margin of victory was less than the number of illegal votes); *Reese v. Duncan*, 80 S.W.3d 650, 656 (Tex. App. 2002) (illegal votes exceeding margin justify voiding results). The Secretary of State's ultra vires approval of these systems despite known VSTL accreditation failures violates ministerial duties, HAVA, and the Texas Constitution's mandate to detect fraud and preserve ballot purity (Tex. Const. art. VI, §§ 2(c), 4). The following establishes the systemic illegality of the election.

I. Certification Requirements

The Help America Vote Act of 2002 (HAVA) emerged as a critical federal response to the controversies surrounding the 2000 presidential election, aiming to modernize and standardize voting systems across the United States while enhancing accessibility, accuracy, and security. Central to HAVA's framework is the creation of the EAC, an independent bipartisan

agency tasked with administering grants, developing voluntary voting system guidelines, and overseeing the certification process for election technologies in collaboration with the National Institute of Standards and Technology (NIST). While participation in the EAC's certification program is voluntary for states, it establishes binding procedural standards for any voting systems seeking federal validation, ensuring rigorous testing by accredited laboratories to uphold electoral integrity and prevent administrative overreach.

A. HAVA and EAC Establishment.

The Help America Vote Act of 2002 (HAVA, 52 U.S.C. §§ 20901–21145) established the EAC to assist states with compliance, fund distribution, and the first federal voting system certification program (52 U.S.C. §§ 20962, 20971). The EAC is required by statute to provide for the testing, certification, decertification, and recertification of voting system hardware and software by accredited laboratories (52 U.S.C. § 20971(b)). Laboratories seeking accreditation as VSTLs must apply to the EAC, which reviews compliance with rigorous standards, votes on approval, and issues a Certificate of Accreditation.

The EAC collaborates with the National Institute of Standards and Technology (NIST) and relies on the National Voluntary Laboratory Accreditation Program (NVLAP) for competency determination via the EAC Voting System Test Laboratory Program Manual (Election Assistance Commission, *Voting System Test Laboratory Program Manual* (ver. 2.0 2015)). The manual imposes 21 pages of requirements, including NIST/NVLAP accreditation, conflict-of-interest prohibitions (no vendor ties, annual employee financial disclosures), and enforcement programs. The VSTL Program Manual guides the entire accreditation process by outlining procedural requirements for laboratories, including application, evaluation, and ongoing compliance monitoring to ensure impartial and competent testing of voting systems.

Accredited VSTLs then test voting systems for safety, accuracy, and compliance with VVSG, examining Commercial Off-The-Shelf (COTS) components and proprietary software. The VVSG, developed by the EAC in collaboration with NIST and stakeholders, provides the core technical standards that voting systems must meet, including requirements for functionality, accessibility, usability, security, and auditability; these

guidelines direct the testing protocols to verify that systems are reliable and resistant to manipulation or error. Upon successful testing by an accredited VSTL, the EAC certifies the system for state use (52 U.S.C. § 20971(a)). Participation in the EAC's VSTL Program is voluntary, but adherence to its procedural requirements is mandatory for any system claiming federal certification (EAC VSTL Program Manual v2.0, OMB 3265-0018).

B. Texas Certification Requirements.

Texas law expressly incorporates federal HAVA standards and requires every voting system to be EAC-certified by an accredited VSTL before examination and approval by the Secretary of State (SOS) and Attorney General (Tex. Elec. Code § 122.031; 1 Tex. Admin. Code §§ 81.60, 81.61). Systems must operate safely, efficiently, and accurately and comply with EAC standards (Tex. Elec. Code § 122.001(a)(3)).

Vendors must submit EAC certification to the SOS on Forms 100 and 101 at least 45 days prior to examination (1 Tex. Admin. Code § 81.60(1)). Vendors must also cause the accredited VSTL to deliver all nationally qualified software/firmware, source codes, change logs, and fees directly to the SOS no later than 45 days prior to examination (Tex. Admin. Code §

81.60(3)). The SOS and Attorney General then examine the system for compliance with state standards (Tex. Elec. Code § 122.032(a)). Approval is ministerial: if compliant, the SOS approves; if not, the SOS must deny approval and may enjoin use (Tex. Elec. Code §§ 122.032(a), 122.038(a)).

Counties may adopt only approved systems; use of unapproved systems must be enjoined (Tex. Elec. Code § 122.038(a)). Non-compliance at any step invalidates the entire certification process. *Gonzalez v. Villarreal*, 251 S.W.3d 763, 772 (Tex. App.—Corpus Christi 2008, pet. disp'd). The Texas Constitution mandates regulated elections to detect and punish fraud and preserve ballot purity (Tex. Const. Art. 3, § 27; Art. 6, § 2(c); Art. 6, § 4). Statutes are presumed to require constitutional compliance, effectiveness, reasonableness, feasibility, and public interest priority (Tex. Gov't Code § 311.021). Non-compliant systems introduce undetected errors or fraud risks, violating these provisions by allowing improper practices without safeguards.

C. The Critical Importance of Strict Scrutiny of VSTLs.

Rigorous and continuous scrutiny of VSTL accreditation and performance is indispensable to election integrity for several reasons, one

being the ability to detect and prevent software vulnerabilities. Modern voting systems rely heavily on Commercial Off-The-Shelf (COTS) hardware and software components for cost efficiency and availability. However, COTS parts, often manufactured overseas (including in China), undergo frequent firmware updates, end-of-life replacements, and specification changes that can introduce undetectable backdoors or “black box” modifications. These vulnerabilities enable the insertion of algorithms or scripts capable of intercepting, altering, or redistributing vote tallies during shuffling, mixing, or decryption phases. Only accredited VSTLs possess the mandate and expertise to examine both hardware and software for such threats, ensuring universal verifiability (votes cast equal votes counted) and individual verifiability (voters can confirm their intent was recorded).

Accredited VSTLs also Safeguard systems Against Foreign Interference and National-Security Risks. COTS components in modems, networking equipment, and cloud infrastructure (e.g., supplied by entities with ties to China, Germany, or other nations) create exploitable entry points for foreign actors. Third-party software requiring constant updates further compounds risk. Without active, EAC-accredited VSTL oversight, systems

remain exposed to remote manipulation, trapdoor commitments, or block-vote allocation schemes that preserve cryptographic anonymity while undermining vote integrity. Historical incidents, such as the 2014 disruption of election-tallying systems abroad, illustrate how compromised hardware or deleted commitment keys can flip outcomes undetected. See Alliance for Securing Democracy, *Russian government-connected hacktivist group CyberBerkut breaches Ukraine's Election Commission*, <https://securingdemocracy.gmfus.org/incident/russian-government-connected-hacktivist-group-cyberberkut-breaches-ukraines-election-commission/> (last visited November 9, 2025).

Properly accredited VSTLs Preserve Public Confidence in Election Outcomes. When VSTLs operate without current accreditation, or when accreditation is granted outside statutory procedures, public trust erodes. Unexamined COTS updates, foreign-linked infrastructure (e.g., Akamai Technologies routing through overseas servers), and unverified testing laboratories transform elections into potential vectors for undetectable fraud. Strict, ongoing scrutiny, encompassing hardware provenance,

firmware integrity, and cryptographic soundness, is the only mechanism capable of closing these gaps.

Strict scrutiny of VSTL accreditation and testing is not a bureaucratic formality; it is the cornerstone defense against equipment vulnerabilities, foreign interference, and procedural noncompliance. Any relaxation of EAC oversight, whether through expired certifications, unilateral rule changes, or reliance on non-accredited entities, directly undermines the security, accuracy, and legitimacy of Texas elections. To protect democratic sovereignty, full compliance with HAVA's accreditation regime, coupled with regular hardware audits by properly accredited laboratories, must be non-negotiable.

II. The election systems used in 252 Texas counties do not meet HAVA standards.

HAVA's mandatory adherence (despite voluntary program) binds Texas via Tex. Elec. Code § 122.001(a)(3), creating a chain: invalid VSTL → invalid EAC certification → invalid SOS approval → illegal votes (Tex. Elec. Code § 221.003(b)). The Secretary of State lacks the authority to disregard statutes put in place by the legislature. *State v. Hollins*, 607 S.W.3d 923 (Tex. App. Austin 2020, pet. denied) (county clerk's unsolicited ballot mailing was

ultra vires under Election Code). Non-compliant systems have the potential to introduce undetected errors or fraud risks, violating public interest and trust (Tex. Gov. Code § 311.021(5)).

A. All VSTL's had invalid accreditations when certifying election systems currently in use in 252 Texas counties.

The certifications for all ES&S and Hart InterCivic voting systems deployed in the November 4, 2025, constitutional amendment election across all 254 Texas counties were issued by three VSTLs: NTS, SLI Compliance, and Pro V&V, none of which were properly accredited under HAVA standards (52 U.S.C. §§ 20901–21145) at the time of system testing and certification; specifically, these systems were either tested by VSTLs with expired accreditation or the VSTLs in question were issued certificates not signed by the EAC Chair as required by EAC VSTL Manual Rule 3.6.1, rendering all such certifications invalid under Tex. Elec. Code § 122.001(a)(3) and Tex. Admin. Code §§ 81.60 and 81.61. Consequently, no ES&S or Hart InterCivic system used in the November 4, 2025, election was lawfully certified by either the EAC or the Texas Secretary of State, and all votes cast or tabulated through such illegally certified systems constitute

illegal votes not legally countable pursuant to Tex. Elec. Code § 221.003(b), making the true outcome of the election unascertainable under Tex. Elec. Code § 221.003(a).

Table 1, attached hereto as EXHIBIT F and incorporated by reference, identifies by county the voting systems used in the November 4, 2025, constitutional amendment election was compiled using official data from the Texas Secretary of State's website, supplemented by direct confirmation from county election administrators, and delineates the legal voting portions comprised of hand-counted paper ballots from the illegal voting portions generated by the non-compliant ES&S and Hart InterCivic electronic voting systems, which fail to meet the certification requirements of Tex. Elec. Code § 122.001(a)(3), Tex. Admin. Code §§ 81.60 and 81.61, and federal HAVA standards (52 U.S.C. §§ 20901–21145); accordingly, all votes cast and tabulated through such illegally certified systems constitute illegal votes not legally countable under Tex. Elec. Code § 221.003(b), rendering the true outcome of the election unascertainable pursuant to Tex. Elec. Code § 221.003(a).

Figure 1 - Election system by county

Legal Votes	Illegal Votes										
	Hert Intercom					ES&S					
Vendor: N/A	Verity 2.0.3	Verity 2.5	Verity 2.7	6.2.1	3.0.1.1	5.2.2.0	6.0.2.0	6.0.4.0	6.1.1.0	6.3.0.0	6.3.1.0
Hand Counted	Zapata	Dawson	Verity 2.7	Nacogdoches	Limestone	Haskell	Franklin	Cochran	Frio	Cameron	Halt
Paper ballots	Kerr	Kerr	Hale	Nueces	Haskell	Kleberg	Franklin	Cochran	Andrews	Castro	Hardeman
Counties using:	Collingsworth	Wiltberger	Harris	Palo Pinto	Maverick	Maverick	Jackson	Franklin	Angeline	Clay	Hardeman
			Harris	Parmer			Kinney	Cochran	Ochiltree	Clay	Hardeman
			Hays	Porter			Navarro	Cochran	Oldham	Crockett	Hardeman
			Hidalgo	Rains			Presidio	Cochran	Orange	Crockett	Hardeman
			Hill	Randall			Rochwall	Cochran	Penola	Edwards	Hardeman
			Hood	Realgar				Cochran	Guadalupe	Edwards	Hardeman
			Hookins	Red River				Cochran	Parmer	Edwards	Hardeman
			Callahan	Rehugo				Cochran	Pecos	Edwards	Hardeman
			Cass	Roberts				Cochran	Real	Edwards	Hardeman
			Chambers	Roberts				Cochran	Robertson	Edwards	Hardeman
			Cherokee	Runnels				Cochran	Rusk	Edwards	Hardeman
			Coke	Sabine				Cochran	San Saba	Edwards	Hardeman
			Comal	San Augustine				Cochran	Schleicher	Edwards	Hardeman
			Comanche	San Jacinto				Cochran	Scurry	Edwards	Hardeman
			Concho	San Patricio				Cochran	Shelby	Edwards	Hardeman
			Coryell	Shackelford				Cochran	Sherman	Edwards	Hardeman
			Crosby	Starling				Cochran	Smith	Edwards	Hardeman
			Cubson	Tarrant				Cochran	Somervell	Edwards	Hardeman
			Deaf Smith	Taylor				Cochran	Starr	Edwards	Hardeman
			Delta	Throckmorton				Cochran	Stephens	Edwards	Hardeman
			Denton	Titus				Cochran	Stonewall	Edwards	Hardeman
			DeWitt	Tom Green				Cochran	Sutton	Edwards	Hardeman
			Dickens	Upshur				Cochran	Terry	Edwards	Hardeman
			Duval	Uvalde				Cochran	Tyler	Edwards	Hardeman
			Eastland	Van Zandt				Cochran	Upton	Edwards	Hardeman
			Ector	Waller				Cochran	Val Verde	Edwards	Hardeman
			Falls	Ward				Cochran	Waller	Edwards	Hardeman
			Fannin	Wheeler				Cochran	Washington	Edwards	Hardeman
			Floyd	Wichita				Cochran	Webb	Edwards	Hardeman
			Gaines	Wichita				Cochran	Wharton	Edwards	Hardeman
			Galveston	Wiltacy				Cochran	Wilson	Edwards	Hardeman
			Gillespie	Wood				Cochran	Winkler	Edwards	Hardeman
			Gray	Wood				Cochran	Yoakum	Edwards	Hardeman
			Gregg	Young				Cochran	Zavala	Edwards	Hardeman
				Motley				Cochran	Fort Bend	Edwards	Hardeman
								Cochran	Freestone	Edwards	Hardeman

Texas Secretary of State, Voting Systems by County, <https://www.sos.state.tx.us/elections/forms/sysexam/voting-sys-bycounty.pdf> (Published February 28, 2025)

All versions of the EAC VSTL Program Manual, including those in effect at the time of certification for the systems used in the November 4, 2025, constitutional amendment election, mandate under Rule 3.6.1 that:

"A Certificate of Accreditation will be issued to each accredited laboratory. The certificate will be **signed by the Chair of the Commission...**" (Election Assistance Commission, *Voting System Test Laboratory Program Manual* § 3.8 (ver. 2.0 2015))

None of the ES&S or Hart InterCivic voting systems deployed in the November 4, 2025, election were tested or certified by VSTLs in full compliance with Rule 3.6.1 at the time of their respective certifications, as the certificates lacked the required signature of the EAC Chair.

In addition to the absence of the required signature of the EAC Chair on the certificates of accreditation, substantial controversy exists regarding the validity of the accreditation periods of the VSTLs.

"An EAC grant of accreditation is valid for a period of two years. VSTLs renew their accreditation by submitting an application package, consistent with the procedures in § 3.4 of this manual." (Election Assistance Commission, *Voting System Test Laboratory Program Manual* § 3.8 (ver. 2.0 2015))

On July 23, 2021, the EAC issued modifications to the *Voting System Test Laboratory Program Manual*, Version 3.0, by eliminating Section 3.8 in

its entirety and replaced 3.8 with a regime under which VSTL accreditation possesses no fixed expiration and remains valid solely contingent upon the laboratory's continuous compliance with the monitoring and enforcement standards set forth in Chapter 4 of the Manual. (Election Assistance Commission, *Voting System Test Laboratory Program Manual* § 4 (ver. 3.0 2021))

This modification constitutes a change to the VVSG within the meaning of HAVA. Pursuant to 52 U.S.C. § 20962, any adoption or modification of the VVSG must adhere to the following mandatory procedural requirements:

- Publication of notice of the proposed modification in the Federal Register;
- Provision of a reasonable period for public comment;
- Opportunity for public hearings, if warranted; and
- Submission of the proposed modification for review and recommendation by the EAC Board of Advisors and the EAC Standards Board.

The EAC failed to comply with any of these statutory mandates. It unilaterally promulgated the modification without:

- Submitting the proposed change to the EAC Board of Advisors or the EAC Standards Board for review and recommendation;
- Publishing notice of the proposed modification;
- Soliciting or receiving public comment; or
- Conducting any public hearings.

This unilateral action further contravened the rulemaking requirements of the Administrative Procedure Act, 5 U.S.C. § 551 *et seq.*, which incorporate notice-and-comment obligations for substantive rule changes.

Such noncompliance renders the modification void *ab initio* under the *Accardi* doctrine, which holds that an agency's failure to follow its own mandatory regulations and statutory procedures constitutes reversible error. *United States ex rel. Accardi v. Shaughnessy*, 347 U.S. 260, 266–68 (1954). Moreover, an agency may not waive or disregard congressionally imposed procedural mandates. *Loper Bright Enters. v. Raimondo*, 603 U.S. 369, 371 (2024).

Accordingly, the EAC's elimination of Section 3.8 and its replacement with an indefinite, compliance-dependent accreditation regime is procedurally defective, ultra vires, and without legal force or effect.

Table 1, attached hereto as EXHIBIT G and incorporated herein by reference, enumerates the specific deficiencies in each Certificate of Accreditation issued by the EAC to the VSTLs: NTS, SLI Compliance, and Pro V&V, that conducted testing and issued reports relied upon for the certification of all ES&S and Hart InterCivic voting systems deployed in the November 4, 2025, constitutional amendment election, including but not limited to the absence of the required signature of the EAC Chair pursuant to EAC VSTL Program Manual Rule 3.6.1 and the expiration of accreditation prior to testing, rendering all such certifications invalid under federal HAVA standards (52 U.S.C. §§ 20901–21145) and Texas law (Tex. Elec. Code § 122.001(a)(3); Tex. Admin. Code §§ 81.60, 81.61). (Election Assistance Commission, *Voting System Test Laboratory Program Manual* § 3.6.1 (ver. 2.0 2015))

Table 1- Deficiencies in the EAC accreditation

VSTL	Certificate Date	Defect	EXHIBIT
Wyle (NTS)	10/4/2007	No EAC Chair signature, expired 2009	J
Wyle (NTS)	5/4/2010	Expired 2012	K
SysLabs (SLI)	2/28/2007	No EAC Chair signature, expired 2009	L
SysLabs (SLI)	7/16/2009	Expired 2011	M
SLI	Jan 10, 2018	No EAC Chair signature, issued for 3 years (exceeds 2-year limit)	N
SLI	Feb 1, 2021	No EAC Chair signature, no expiration date	P
SLI	Nov 15, 2022	No EAC Chair signature, no expiration date	Q
SLI	Feb 24, 2025	No EAC Chair signature, no expiration date	R
Pro V&V	Feb 24, 2015	No EAC Chair signature, expired 2017	S
Pro V&V	Feb 1, 2021	No EAC Chair signature, no expiration date	T
Pro V&V	Dec 21, 2022	No EAC Chair signature, no expiration date	U
Pro V&V	April 1, 2025	No EAC Chair signature, no expiration date	V

Public records from the EAC confirm that NTS (formerly Wyle Laboratories) held valid VSTL accreditation only from May , 2010, to May , 2012; SLI Compliance (formerly SysTest Labs) only from July 19, 2009, to July 19, 2011; and Pro V&V has never held HAVA-compliant certification at any time. In addition no evidence was found that NTS ever held any EAC certification post their acquisition of Wyle labs March 4, 2014. See Election Assistance Commission, *Legacy Voting System Test Laboratories*, <https://www.eac.gov/voting-equipment/legacy-voting-system-test-laboratories> (last visited November 5, 2025). As a result, every ES&S and Hart InterCivic voting system currently deployed in Texas, certified solely by these three non-accredited VSTLs, is in violation of federal law (52 U.S.C. § 20971) and Tex. Elec. Code § 122.001(a)(3), rendering all machine-tabulated votes illegal under Tex. Elec. Code § 221.003(b), rendering the true outcome of the election unascertainable pursuant to Tex. Elec. Code § 221.003(a). Thus, **illegal votes exceed the margin of victory, materially affecting the result.**

Table 2, attached hereto as EXHIBIT H and incorporated herein by reference, enumerates the specific certification dates of all ES&S and Hart

InterCivic voting systems used in the November 4, 2025, constitutional amendment election and demonstrates that none of these systems were certified during any period in which the responsible VSTLs were in full compliance with federal HAVA accreditation standards (52 U.S.C. §§ 20901–21145).

Table 2- Election system certification

Vendor	System	VSTL	Certification	Legal	Exhibit
			Date	Certification	
Hart Intercivic	Verity 2.0.3	SLI	4/27/2017	NO	X
	Verity 2.5	SLI	9/9/2020	NO	Y
	Verity 2.7	SLI	6/7/2022	NO	Z
	6.2.1	Unknown	Unknown	Unknown	N/A
ES&S	3.0.1.1	Unknown	Unknown	Unknown	N/A
	5.2.2.0	NTS	2/27/2017	Unknown	AA
	6.0.2.0	SLI	10/4/2018	NO	AB
	6.0.4.0	SLI	5/3/2019	NO	AC
	6.1.1.0	Pro V&V	5/18/2020	NO	AD
	6.3.0.0	Pro V&V	11/11/2022	NO	AE
	6.3.1.0	Unknown	Unknown	Unknown	N/A

Election Assistance Commission, *Certified Voting Systems*, <https://www.eac.gov/voting-equipment/certified-voting-systems> (last visited November 5, 2025)

In addition to the ES&S and Hart InterCivic voting systems not having been tested or certified by VSTLs that were fully compliant with federal HAVA accreditation standards (52 U.S.C. §§ 20901–21145), EAC VSTL Program Manual requirements (Election Assistance Commission, *Voting System Test Laboratory Program Manual* §§ 3.6.1, 3.8 (ver. 2.0 2015)), and Texas certification rules (Tex. Elec. Code § 122.001(a)(3); 1 Tex. Admin. Code §§ 81.60, 81.61), certain systems deployed statewide in the November 4, 2025, constitutional amendment election exhibit no record or evidence of ever having received any certification whatsoever from the EAC as no certification information is available on the EAC website for Hart InterCivic 6.2.1 and ES&S versions 3.0.1.1 and 6.3.0.1. See Election Assistance Commission, *Certified Voting Systems*, <https://www.eac.gov/voting-equipment/certified-voting-systems> (last visited November 5, 2025). The complete absence of any certification for these systems constitutes a direct and unequivocal violation of Tex. Elec. Code § 122.031, which expressly prohibits the use of any unapproved voting system in Texas elections, and further violates Tex. Elec. Code § 122.038, which mandates Secretary of State approval only upon satisfactory demonstration of compliance with

federal standards. Texas law expressly incorporates federal HAVA standards by requiring that every voting system be certified by the Secretary of State only after the vendor submits a VSTL test report confirming compliance with the latest EAC-adopted VVSG and federal accreditation requirements (Tex. Elec. Code § 122.001(a)(3); 1 Tex. Admin. Code § 81.60(2)).

When VSTLs lack proper HAVA-compliant accreditation, whether through expired certificates, absence of the EAC Chair's signature on certificates as required by EAC VSTL Program Manual Rule 3.6.1, or testing conducted outside the accredited scope, the resulting reports and certifications are void *ab initio*, rendering the systems non-compliant with federal standards and, by necessary extension, ineligible for certification or use under Texas law (1 Tex. Admin. Code §§ 81.60, 81.61). Consequently, the ES&S and Hart InterCivic systems used in the November 4, 2025, constitutional amendment election, having been certified in reliance upon invalid VSTL testing or in the complete absence of any certification, fail to satisfy Tex. Elec. Code § 122.001(a)(3)'s mandatory requirement that a voting system must "operate safely, efficiently, and accurately and comply with voting system standards adopted by the Election Assistance

Commission.” This non-compliance directly causes every vote cast or tabulated through such systems to constitute an illegal vote that is not legally countable pursuant to Tex. Elec. Code § 221.003(b), thereby rendering the true outcome of the election materially affected and unascertainable under Tex. Elec. Code § 221.003(a).

B. The SOS approved contracts for non-compliant voting systems.

Since the passage of HB 2900 in 2015, the Texas Secretary of State has ultra vires approved non-compliant ES&S and Hart InterCivic voting systems lacking valid EAC-accredited VSTL certification, in direct violation of Tex. Elec. Code § 122.001(a)(3) and 52 U.S.C. § 20971. *City of El Paso v. Heinrich*, 284 S.W.3d 366, 372 (Tex. 2009) (official acts contrary to clear statutory mandate are ultra vires); *Houston Belt & Terminal Ry. Co. v. City of Houston*, 487 S.W.3d 154, 161 (Tex. 2016). For over three years, Contestants and other concerned voters have filed lawsuits and formally notified the SOS of these VSTL accreditation deficiencies, yet the agency has failed to decertify or suspend the systems. See:

- *Strongin et al. v. Scott et al.*, 5th Cir. 2023 (No. 23-10936)
- *Pique et al. v Nelson*, 15th Cir. 2024 (No. 24-00074)

- *In re Cope*, Tex. Sup. Ct. 2022 (No. 22-0954)
- *Mahfouz et al. v. Oliver*, Burleson Co. 2022 (No. 30740)
- *Jorolan et al. v. Eads*, Denton Co. 2022 (No. 22-10692-481)
- *Kuslich v Bush et al.*, Liberty Co. 2022 (No. 22DC-CV-01090)

The Secretary of State's persistent failure to enforce mandatory voting system certification requirements under Tex. Elec. Code §§ 122.001(a)(3) and 122.032 is ultra vires, as it exceeds statutory authority and violates non-discretionary ministerial duties. *Wichita Falls State Hosp. v. Taylor*, 106 S.W.3d 692, 697–98 (Tex. 2003) (sovereign immunity waived for ultra vires acts by state officials enforcing unconstitutional or unlawful mandates). These ongoing violations justify immediate injunctive relief to enjoin certification of the November 4, 2025 election results and void the outcome of Proposition 14 under Tex. Elec. Code § 233.008.

As the chief election officer of Texas, the Secretary of State bears a solemn duty under Tex. Elec. Code § 31.001 to supervise the administration of elections, ensure compliance with state and federal standards, and safeguard the voting rights of all Texans against any threats to the integrity of the electoral process, including rogue elements within the federal

government that may undermine certification protocols through unauthorized procedural changes or lapses in oversight. Despite being alerted to critical certification deficiencies in the accreditation of these laboratories, issues that rendered ES&S and Hart InterCivic systems non-compliant and led to widespread illegal votes, the Secretary failed to intervene, approve only certified systems as mandated by Tex. Elec. Code § 122.001(a)(3), or pursue injunctions against unapproved equipment under § 122.038, thereby derelicting her ministerial obligations and allowing the disenfranchisement of millions, necessitating judicial intervention to restore the sanctity of the ballot.

VIII. Causes of Action

Contestants assert the following causes of action against Contestee Jane Nelson in her official capacity as Secretary of State. This election contest is governed by Texas Election Code Chapter 233. Contestants seek to establish that illegal votes due to non-compliant systems materially affected the outcome of the November 4, 2025, election for Proposition 14, warranting voiding of the canvass and a new election under Tex. Elec. Code §§ 221.012(b), 233.011.

Count 1: Election Contest for Illegal Votes and Unascertainable Outcome (Tex. Elec. Code §§ 221.003(a)(1), 221.003(b), 233.002)

Contestants bring this election contest pursuant to Texas Election Code Chapter 233, alleging that a substantial number of illegal votes were counted, rendering the true outcome of the election for Proposition 14 unascertainable. Votes cast or tabulated on non-compliant ES&S and Hart InterCivic systems in 252 of Texas's 254 counties are illegal under Tex. Elec. Code § 221.003(b), as these systems failed to comply with mandatory certification standards under Tex. Elec. Code § 122.001(a)(3), which requires conformance with EAC-adopted VVSG and testing by properly accredited VSTLs per HAVA § 231(b) (52 U.S.C. § 20971), Tex. Admin. Code §§ 81.60–81.61.

The factual basis includes: (i) all VSTLs had invalid or expired accreditations at the time of certifying the systems in question, lacking required EAC Chair signatures and effective dates; (ii) the Secretary approved contracts for these non-compliant systems, in violation of her ministerial duties; and (iii) only Collingsworth and Kent Counties used compliant hand-counted paper ballots. These illegal votes, exceeding the

reported 1,092,280-vote margin, directly caused the canvass to include uncountable ballots, materially affecting the result as the number of illegal votes surpasses the margin of victory. See *Andrade v. NAACP of Austin*, 345 S.W.3d 1, 10–11 (Tex. 2011) (voters have standing to challenge systems causing dilution or illegal votes).

The elements of this cause are met: (1) an election was held; (2) illegal votes were counted; (3) the number of illegal votes exceeds the margin; and (4) the outcome is unascertainable. This violation entitles Contestants to relief under Tex. Elec. Code §§ 221.012(b) (voiding canvass) and 233.011 (ordering new election).

Count 2: Ultra Vires Acts by State Official as Grounds for Illegal Votes (Tex. Elec. Code §§ 122.001(a)(3), 122.031–122.038)

As grounds for the election contest under Chapter 233, Contestants allege that the Secretary committed ultra vires acts by approving and allowing the deployment of non-compliant voting systems, exceeding her legal authority and failing to perform ministerial duties, thereby rendering votes on those systems illegal. The Secretary's approval of ES&S and Hart InterCivic systems violated explicit statutory requirements for EAC-

compliant certification, including submission of accredited VSTL reports and source-code escrow under Tex. Admin. Code §§ 81.60–81.61. These actions contravened HAVA § 231(b) and Texas law, making the systems illegal for use in the election.

Factual allegations include: (i) the systems were certified by VSTLs with invalid accreditations, as detailed in Table 1 (deficiencies in EAC accreditation); (ii) the Secretary failed to enforce compliance despite her authority under Tex. Elec. Code § 122.038 to seek injunctions against unapproved equipment; and (iii) this resulted in widespread use of non-conforming systems in 252 counties, as shown in Figure 1 and Table 2.

The elements of an ultra vires claim are satisfied: (1) the official acted without legal authority or failed a ministerial duty; (2) the act violated clear statutory mandates; and (3) prospective relief is sought. See *City of El Paso v. Heinrich*, 284 S.W.3d 366, 372 (Tex. 2009); *Houston Belt & Terminal Ry. Co. v. City of Houston*, 487 S.W.3d 154, 161 (Tex. 2016). Sovereign immunity does not bar this claim, and these ultra vires acts provide the basis for finding illegal votes under Tex. Elec. Code § 221.003(b), warranting voiding the election.

Count 3: Violation of Due Process and Equal Protection as Grounds for Voiding Election (Tex. Const. art. I, § 19; U.S. Const. amend. XIV)

As additional grounds for the election contest under Chapter 233, Contestants allege violations of procedural and substantive due process and equal protection under the Texas and U.S. Constitutions, as the use of non-compliant systems denied a fair opportunity to cast legal votes and created disparate treatment among voters, materially affecting the outcome. In Burleson, Comal, and Liberty Counties, Contestants were forced to use illegal systems, nullifying their votes and diluting their electoral weight compared to voters in Collingsworth and Kent Counties using compliant methods.

Key facts: (i) illegal votes in 252 counties exceeded the margin, causing dilution; (ii) the Secretary's ultra vires approval imposed unequal burdens on machine-reliant voters; and (iii) this disparate impact infringes on the fundamental right to vote without justification.

Elements are met: (1) deprivation of a protected interest (right to vote) without due process; (2) unequal treatment lacking rational basis; and (3) causation traceable to the Secretary's actions. See *Bush v. Gore*, 531 U.S. 98,

104–05 (2000); *Andrade v. NAACP of Austin*, 345 S.W.3d 1, 10–11 (Tex. 2011); *Thornburg v. Gingles*, 478 U.S. 30, 51 (1986). These violations support voiding the election under Tex. Elec. Code § 233.011.

IX. Declarations from Authorities

***Terpsehore Maras* (EXHIBIT AF)**

The November 29, 2020 Affidavit of Terpsehore Maras presents unambiguous evidence that:

- a. Elections are null and void due to lack of EAC certifications of Voting Systems and the VSTL used to certify the Voting Systems. The significance of VSTLs being accredited and examining the HARDWARE is key. Commercial off-the-shelf software updates for hardware are typically the avenues of entry into the network.
- b. FROG-like cyphers use encryption keys as data and create, combine or alter data such that the secret key (decipher key) is used as a program. The FROG-like cypher interprets the data as the key instructs resulting in the manipulation of the vote tallies to a desired outcome.

c. The systems can take multiple pathways to ensure a predetermined outcome. If the algorithm detects that the current real-time vote tallies would lead to an undesired result it would either self-adjust or require manual changes such as block allocation and parameter narrowing to meet the predetermined outcome.

d. The existence of a “trapdoor” key allows for the potential manipulation of election results, either unilaterally by Scytl or through collusion with other parties.

e. GEMS can be deployed across ALL machines is IF all counties across the nation are housed under the same server networks.

f. DHS is now housing all networks of states under their jurisdiction which in essence has FEDERALIZED our elections on a technical basis considering Secretary of States are also considered Federal Employees of DHS further blurring the lines of state and federal jurisdiction in elections.

X. Prayer

Contestants move the Court to:

1. Preserve under seal every memory card, USB drive, audit log, and ballot image from all 254 counties;
2. Compel the Secretary of State to produce: (i) current VSTL accreditation certificates with EAC Chair signatures and effective dates; (ii) full testing reports; and (iii) source-code escrow agreements;
3. Declare all votes cast or tabulated on non-conforming systems illegal and uncountable under Tex. Elec. Code § 221.003(b);
4. Subtract all votes cast or tabulated on non-conforming systems from the final tally, void canvass if unascertainable (Tex. Elec. Code § 221.012(b));
5. Direct the appropriate authority to order a new election barring the use of non-compliant systems (Tex. Elec. Code § 233.011)

Respectfully submitted,

s/ Shannon Huggins
Shannon Huggins

s/ Lars Kuslich
Lars Kuslich

s/ Jose Silvester
Jose Silvester
Pro Se Contestants