

State and local officials to undo the will of the people. His campaign convened fake electors on the baseless pretense that former Vice President Biden won several States due to fraud or other malfeasance. The President tried to subvert the Department of Justice by browbeating its leadership to endorse his election lies. And when the DOJ's senior personnel did not acquiesce, President Trump sought to install a loyalist who would.

When all those efforts failed, President Trump betrayed his own Vice President. He pressured Vice President Pence to obstruct the joint session of Congress on January 6th, falsely claiming that he had the power to refuse to count certain electoral votes. President Trump knew this was illegal but attempted to justify it with lies about the election.

On December 19, 2020, President Trump summoned a mob to Washington, DC on the same day that Congress was set to certify former Vice President Biden's victory by claiming the election was stolen and promising a "wild" protest.³¹⁵

And the bogus stolen election claim was the focus of President Trump's speech on January 6th. The litany of lies he told riled up a mob that would march to the U.S. Capitol to intimidate Vice President Pence and Members of Congress.

"And we fight. We fight like hell. And if you don't fight like hell, you're not going to have a country anymore," President Trump told the crowd.³¹⁶ He incited them with these words just after praising his own election night lie—the Big Lie.

President Trump told his followers to "fight" to "save" their country from a bogus specter of supposed election fraud.³¹⁷ And many of them did.

ENDNOTES

1. "Donald Trump 2020 Election Night Speech Transcript," Rev, (Nov. 4, 2020), available at <https://www.rev.com/blog/transcripts/donald-trump-2020-election-night-speech-transcript>.
2. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), pp. 54, 60.
3. Select Committee to Investigate the January 6th Attack on the United States Capitol, Deposition of Jason Miller, (Feb. 3, 2022), pp. 74-75.
4. Select Committee to Investigate the January 6th Attack on the United States Capitol, Deposition of Jason Miller, (Feb. 3, 2022), pp. 75, 78.
5. Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol (National Archives Production), 076P-R000010020_0001 (Email chain between Tom Fitton and Molly Michael, starting on October 31, 2020, and ending on November 3, 2020, discussing a draft victory statement for President Trump).
6. We note that Bannon refused to testify and has been convicted of criminal contempt by a jury of his peers. See "Stephen K. Bannon Sentenced to Four Months in Prison on Two Counts of Contempt of Congress," Department of Justice, (Oct. 21, 2022), available at

<https://www.justice.gov/usao-dc/pr/stephen-k-bannon-sentenced-four-months-prison-two-counts-contempt-congress>; Dan Friedman, "Leaked Audio: Before Election Day, Bannon Said Trump Planned to Falsely Claim Victory," Mother Jones, (July 12, 2022), available at <https://www.motherjones.com/politics/2022/07/leaked-audio-steve-bannon-trump-2020-election-declare-victory/>.

7. At his interview, Stone invoked his Fifth Amendment Right not to incriminate himself, including to questions regarding his direct communications with Donald Trump and his role on January 6th. Select Committee to Investigate the January 6th Attack on the United States Capitol, *Business Meeting on the January 6th Investigation*, 117th Cong., 2d sess., (Oct. 13, 2022), at 39:15 - 39:33 available at <https://www.youtube.com/watch?v=IQvuBoLBuCO>.
8. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Barr, (June 2, 2022), p. 27.
9. Jennifer Agiesta and Marshall Cohen, "CNN Poll: Questions about Accuracy of Vote Counting Rise as Most Want to Vote before Election Day," CNN, (Aug. 18, 2020), available at <https://www.cnn.com/2020/08/18/politics/cnn-poll-trump-biden-election-security-mail-in-voting/index.html>; Mark Murray, "Biden Leads Trump by 10 points in Final Pre-Election NBC News/WSJ poll," NBC News, (Nov. 1, 2020, updated Nov. 2, 2020), available at <https://www.nbcnews.com/politics/meet-the-press/biden-leads-trump-10-points-final-pre-election-nbc-news-n1245667>.
10. Select Committee to Investigate the January 6th Attack on the United States Capitol, *Hearing on the January 6th Investigation*, 117th Cong., 2d sess., (June 13, 2022), available at <https://www.govinfo.gov/committee/house-january6th>.
11. Select Committee to Investigate the January 6th Attack on the United States Capitol, *Hearing on the January 6th Investigation*, 117th Cong., 2d sess., (June 13, 2022), available at <https://www.govinfo.gov/committee/house-january6th>.
12. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), p. 44.
13. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), pp. 44-45.
14. Select Committee to Investigate the January 6th Attack on the United States Capitol, *Hearing on the January 6th Investigation*, 117th Cong., 2d sess., (June 13, 2022), available at <https://www.govinfo.gov/committee/house-january6th>.
15. Dan Friedman, "Leaked Audio: Before Election Day, Bannon Said Trump Planned to Falsely Claim Victory," Mother Jones, (July 12, 2022), available at <https://www.motherjones.com/politics/2022/07/leaked-audio-steve-bannon-trump-2020-election-declare-victory/>. During our October 13 hearing, Robert Costa tweeted: "CBS News has confirmed that Oct. 31, 2020, was a key date in the pre-election maneuvers by Trump. Set off alarm with WH counsel and Herschmann, among others. I've seen texts from that night from some aides and they knew it was no joke; declaring victory was Trump's plan. Period." Maggie Haberman retweeted Costa, writing: "Trump told a conference call of a bunch of lawyers and informal advisers working for him earlier that month that he was going to go up and say he won, first reported by @jonathanvswan." Robert Costa (@costareports), Twitter, Oct. 13, 2022 1:29 p.m. ET, available at <https://twitter.com/costareports/status/1580611586674151424?lang=en>; see also Maggie Haberman (@maggieNYT), Twitter, Oct. 13, 2022 1:35 p.m. ET, available at <https://twitter.com/maggienyt/status/1580613143637635072> ("Trump told a conference call of a bunch of lawyers and informal advisers working for him earlier that month that he was going to go up and say he won, first reported by @jonathanvswan").
16. Dan Friedman, "Leaked Audio: Before Election Day, Bannon Said Trump Planned to Falsely Claim Victory," Mother Jones, (July 12, 2022), available at <https://www.motherjones.com/politics/2022/07/leaked-audio-steve-bannon-trump-2020-election-declare-victory/>.

17. Fox Business, "Steve Bannon: Trump Won't Allow the Election to Be Stolen," YouTube, at 3:24, Nov. 3, 2020, available at <https://www.youtube.com/watch?v=PDdxoyAUqoo>.
18. "Steve Bannon: Donald Trump Will Claim Victory 'Right Before the 11 O'clock News,'" Media Matters, (Nov. 3, 2020), available at <https://www.mediamatters.org/steve-bannon/steve-bannon-donald-trump-will-claim-victory-right-11-oclock-news-0>.
19. Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol (National Archives Production), 076P-R000010020_0001 (Email chain between Tom Fitton and Molly Michael, starting on October 31, 2020, and ending on November 3, 2020, discussing a draft victory statement for President Trump).
20. Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol (National Archives Production), 076P-R000010020_0001 (Email chain between Tom Fitton and Molly Michael, starting on October 31, 2020, and ending on November 3, 2020, discussing a draft victory statement for President Trump).
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22. Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol (National Archives Production), 076P-R000010020_0001 (Email chain between Tom Fitton and Molly Michael, starting on October 31, 2020, and ending on November 3, 2020, discussing a draft victory statement for President Trump).
23. Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol (National Archives Production), 076P-R000010020_0001 (Email chain between Tom Fitton and Molly Michael, starting on October 31, 2020, and ending on November 3, 2020, discussing a draft victory statement for President Trump).
24. Select Committee to Investigate the January 6th Attack on the United States Capitol, *Business Meeting on the January 6th Investigation*, 117th Cong., 2d sess., (Oct. 13, 2022), at 38:18 - 39:32, available at <https://www.youtube.com/watch?v=IQvuBoLBuCO>.
25. Jonathan Swan, "Trump Plans to Declare Premature Victory If He Appears on Election Night," *Axios*, (Nov. 1, 2020), available at <https://www.axios.com/2020/11/01/trump-claim-election-victory-ballots>.
26. Jonathan Swan, "Trump Plans to Declare Premature Victory If He Appears on Election Night," *Axios*, (Nov. 1, 2020), available at <https://www.axios.com/2020/11/01/trump-claim-election-victory-ballots>.
27. Jonathan Swan, "Trump Plans to Declare Premature Victory If He Appears on Election Night," *Axios*, (Nov. 1, 2020), available at <https://www.axios.com/2020/11/01/trump-claim-election-victory-ballots>.
28. Select Committee to Investigate the January 6th Attack on the United States Capitol, *Hearing on the January 6th Investigation*, 117th Cong., 2d sess., (June 13, 2022), available at <https://www.govinfo.gov/committee/house-january6th>.
29. Months prior to the election, Josh Mendelsohn, the CEO of Hawkfish, a Democratic data and analytics firm, warned that President Trump would try to take advantage of the Red Mirage. See Margaret Talev, "Exclusive: Dem Group Warns of Apparent Trump Election Day Landslide," *Axios*, (Sept. 1, 2020), available at <https://www.axios.com/2020/09/01/bloomberg-group-trump-election-night-scenarios>. For other accounts warning that election night would see a Red Mirage, see Marshall Cohen, "Deciphering the 'Red Mirage,' the 'Blue Shift,' and the Uncertainty Surrounding Election Results This November," CNN, (Sept. 1, 2020), available at <https://www.cnn.com/2020/09/01/politics/2020-election-count-red-mirage-blue-shift/index.html>; Darragh Roche, "Trump Is Heading for a 'Red Mirage' Win on Election Night, Bloomberg-Funded Data Firm Says," *Newsweek*, (Sept. 1, 2020), available at <https://www.newsweek.com/trump-phantom-win-election-1528948>; Tom McCarthy, "'Red

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 31. Donald J. Trump (@realDonaldTrump), Twitter, Apr. 8, 2020 8:20 a.m. ET, available at <http://web.archive.org/web/20201201162757/https://twitter.com/realDonaldTrump/status/1247861952736526336> (archived).
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 34. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), p. 36; Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol, (National Archives Production), 076P-R000010941_0001-2, 076P-R000010940_0001-6 (July 23, 2020, emails regarding scheduling a meeting for the President with McCarthy, Stepien, and others).
 35. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), p. 36.
 36. Fox News, "President Trump Goes One-on-One with Chris Wallace," YouTube, July 19, 2020, available at <https://www.youtube.com/watch?v=W6XdpDOH1JA>; Pat Ward (@WardDPatrick), Twitter, July 19, 2020 10:15 a.m. ET, available at <https://twitter.com/WardDPatrick/status/1284854318575878144>.
 37. "Remarks by President Trump in Press Briefing," White House, Sept. 23, 2020, available at <https://trumpwhitehouse.archives.gov/briefings-statements/remarks-president-trump-press-briefing-092420/>.
 38. "Remarks by President Trump in Press Briefing," White House, Sept. 23, 2020, available at <https://trumpwhitehouse.archives.gov/briefings-statements/remarks-president-trump-press-briefing-092420/>.
 39. Barbara Sprunt, "Trump Questions Election Again after White House Walked Back His Earlier Remarks," NPR, (Sept. 24, 2020), available at <https://www.npr.org/2020/09/24/916440816/republican-leaders-reject-trump-hedging-on-transfer-of-power-amid-war-over-confi>.
 40. Donald J. Trump (@realDonaldTrump), Twitter, Nov. 4, 2020 12:49 a.m. ET, available at <http://web.archive.org/web/20201105044240/https://twitter.com/realDonaldTrump/status/1323864823680126977> (archived); Donald J. Trump (@realDonaldTrump), Twitter, Nov. 4, 2020 10:04 a.m. ET, available at <http://web.archive.org/web/20201104153504/https://twitter.com/realDonaldTrump/status/1324004491612618752> (archived).
 41. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), pp. 44-45.
 42. "Donald Trump 2020 Election Night Speech Transcript," Rev, (Nov. 4, 2020), available at <https://www.rev.com/blog/transcripts/donald-trump-2020-election-night-speech-transcript>.

43. See “Donald Trump 2020 Election Night Speech Transcript,” Rev, (Nov. 4, 2020), available at <https://www.rev.com/blog/transcripts/donald-trump-2020-election-night-speech-transcript>; Donald J. Trump (@realDonaldTrump), Twitter, Nov. 4, 2020 12:49 a.m. ET, available at <http://web.archive.org/web/20201104060648/https://twitter.com/realDonaldTrump/status/1323864823680126977> (archived).
44. Dan Friedman, “Leaked Audio: Before Election Day, Bannon Said Trump Planned to Falsely Claim Victory,” Mother Jones, (July 12, 2022), available at <https://www.motherjones.com/politics/2022/07/leaked-audio-steve-bannon-trump-2020-election-declare-victory/>.
45. Factba.se, “Interview: Maria Bartiromo Interviews Donald Trump on Fox News - November 29, 2020,” Vimeo, Nov. 29, 2020, at esp. 1:42-3:35, available at <https://vimeo.com/485180163>; Donald J. Trump (@realDonaldTrump), Twitter, Nov. 4, 2020 10:17 a.m. ET, available at <https://media-cdn.factba.se/realdonaldtrump-twitter/1324007806694023169.jpg> (archived); Donald J. Trump (@realDonaldTrump), Twitter, Nov. 4, 2020 10:04 a.m. ET, available at <https://media-cdn.factba.se/realdonaldtrump-twitter/1324004491612618752.jpg> (archived); Donald J. Trump (@realDonaldTrump), Twitter, Nov. 18, 2020 8:22 p.m. ET, available at <https://media-cdn.factba.se/realdonaldtrump-twitter/1329233502139715586.jpg> (archived); Donald J. Trump (@realDonaldTrump), Twitter, Nov. 19, 2020 8:49 p.m. ET, available at <https://media-cdn.factba.se/realdonaldtrump-twitter/1329602736053252107.jpg> (archived).
46. For example, one widely shared post claimed that, in the early-morning hours of November 4, hundreds of thousands of mail in ballots were “found” in Wisconsin, Michigan, and Pennsylvania, and all of the ballots were for Biden. Nick Adams (@NickAdamsinUSA), Twitter, Nov. 4, 2020 4:48 p.m., available at <https://web.archive.org/web/20201110150437/https://twitter.com/NickAdamsinUSA/status/1324151663641448448> (archived).
47. In many metropolitan areas, absentee ballots are counted in centralized locations and reported in batches. For example, the ballots that were supposedly “found” in Wisconsin were absentee ballots reported by Milwaukee County when that county completed its tally. Of the approximately 181,000 votes reported between 3:26 and 3:44 a.m., Biden received approximately 83% of the votes and Trump received approximately 17%. See Eric Litke and Madeline Heim, “Fact check: Wisconsin Did Not ‘Find’ 100K Ballots around 4 a.m. the Morning after the Election, or Take Break from Counting Votes,” *Milwaukee Journal Sentinel*, (Nov. 4, 2020), available at <https://www.jsonline.com/story/news/elections/elections/2020/11/04/wisconsin-didnt-find-ballots-stop-count-voter-fraud-claims-untrue-politifact/6165435002/>. In Michigan, no ballots were “found” between 3:30-5:00 a.m. Rather, approximately 200,000 votes were reported by Wayne County shortly after 6:00 a.m., the vast majority of which were for Biden. See Geoffrey Skelley, “Live Bog: 2020 Election Results Coverage: Michigan’s Morning Update,” *FiveThirtyEight*, (Nov. 4, 2020), available at <https://fivethirtyeight.com/live-blog/2020-election-results-coverage/#294294>. Overall, Biden won 68% of the vote in Wayne County, to 30% for Trump. However, among absentee voters, Biden won 75% to Trump’s 23%. See “November 3, 2020 - General Election Results,” Charter County of Wayne, Michigan, available at <https://www.waynecounty.com/elected/clerk/november-3-2020-general-election-results.aspx>.
48. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), p. 45; See also John Curiel, Charles Stewart III, and Jack Williams, *One Shift, Two Shifts, Red Shift, Blue Shifts: Reported Election Returns in the 2020 Election*, MIT Election Data and Science Lab, (July 9, 2021), p. 40, available at https://electionlab.mit.edu/sites/default/files/2021-07/curiel_stewart_williams_blue_shift_esra_final.pdf, (detailed analysis of timed reporting data shows that “smaller and more rural counties, which favored Trump, could report their ballots before the counties with hundreds of precincts and hundreds of thousands of voters”).
49. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Barr, (June 2, 2022), p. 8.
50. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Barr, (June 2, 2022), p. 8.

51. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), p. 119, 124-26, 174.
52. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), p. 174.
53. Select Committee to Investigate the January 6th Attack on the United States Capitol, Deposition of Rudy Giuliani, (May 20, 2022), pp. 22-23.
54. Select Committee to Investigate the January 6th Attack on the United States Capitol, Deposition of Rudy Giuliani, (May 20, 2022), pp. 23, 26.
55. Select Committee to Investigate the January 6th Attack on the United States Capitol, Deposition of Rudy Giuliani, (May 20, 2022), p. 35 (describing Ellis as “a co-counsel” and “my number two person” so “generally, if you got an opinion from Jenna, it would be just like getting an opinion from me”).
56. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Bernard Kerik, (Jan. 13, 2022), pp. 10, 15-18.
57. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), p. 92.
58. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), pp. 111-112.
59. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), p. 134; Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol, (Mark Meadows Production), MM007288, (November 13, 2020, email from Bill Stepien to Mark Meadows, Justin Clark, and Jason Miller titled “Fwd: AZ Federal ID Voters”).
60. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Alex Cannon, (Apr. 13, 2022), pp. 19-23.
61. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Alex Cannon, (Apr. 13, 2022), pp. 38-39.
62. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Alex Cannon, (Apr. 13, 2022), pp. 33-34.
63. Select Committee to Investigate the January 6th Attack on the United States Capitol, Deposition of Jason Miller (Feb. 3, 2022), p. 119.
64. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Matthew Morgan, (Apr. 25, 2022), pp. 117-18.
65. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), pp. 112-13.
66. Select Committee to Investigate the January 6th Attack on the United States Capitol, Deposition of Jason Miller (Feb. 3, 2022), p. 88-91.
67. Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol (Mark Meadows Production), MM010951-52 (November 3, 2020, Jason Miller text message to Mark Meadows at 10:27 pm); Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol (Mark Meadows Production), MM010972 (November 3, 2020, Jason Miller group text message to Mark Meadows and David Bossie at 11:53 pm); Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol (Mark Meadows Production), MM011343 (November 6, 2020, Jason Miller group text message to Mark Meadows, Ivanka Trump, Bill Stepien, Hope Hicks, Dan Scavino, and Jared Kushner at 11:10 am).
68. Select Committee to Investigate the January 6th Attack on the United States Capitol, Deposition of Jason Miller (Feb. 3, 2022), p. 91.
69. Select Committee to Investigate the January 6th Attack on the United States Capitol, Deposition of Jason Miller (Feb. 3, 2022), p. 91.

70. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), pp. 115–17; Brian Slodysko, “Explainer: Why AP Called Pennsylvania for Biden,” Associated Press (Nov. 7, 2020), available at <https://apnews.com/article/ap-called-pennsylvania-joe-biden-why-f7dba7b31bd21ec2819a7ac9d2b028d3>.
71. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), pp. 115–20.
72. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), p. 118.
73. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), p. 119.
74. Select Committee to Investigate the January 6th Attack on the United States Capitol, *Hearing on the January 6th Investigation*, 117th Cong., 2d sess., (June 13, 2022), available at <https://www.govinfo.gov/committee/house-january6th>.
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76. Select Committee to Investigate the January 6th Attack on the United States Capitol, *Hearing on the January 6th Investigation*, 117th Cong., 2d sess., (June 13, 2022), available at <https://www.govinfo.gov/committee/house-january6th>.
77. “Risk-Limiting Audit Report – Georgia Presidential Contest, November 2020,” Georgia Secretary of State, (Nov. 19, 2020), available at https://sos.ga.gov/sites/default/files/2022-02/11.19_20_risk_limiting_audit_report_memo_1.pdf.
78. See “Summary of Hand Count Audits – 2020 General Election,” Arizona Secretary of State, (Nov. 17, 2020), available at <https://azsos.gov/2020-general-election-hand-count-results>; “Agreed Upon Procedures Report – Evaluation of the Accuracy of Voting Machine Tabulators Used for the 2020 General Elections Held on November 3, 2020 (Voting System Check),” New Mexico Secretary of State, (Dec. 15, 2020), available at <https://api.realfile.rtsclients.com/PublicFiles/ee3072ab0d43456cb15a51f7d82c77a2/f740346c-7b6b-4479-acd6-068829382307/2020%20Post%20Election%20Voting%20System%20Check%20Audit%20Results.pdf>. Similar audits conducted by Michigan, Pennsylvania, and Wisconsin also affirmed the results in those states, but their results are excluded from this list because in those instances their audit results were not available until after January 6th. Shortly after the election, Nevada also conducted some post-election checks that supported the validity of the results there too, including testing a sample of the voting machines to make sure votes were accurately recorded. Deposition of Joseph Gloria at 33, *Law v. Whitmer*, No. A-22-858609-W (Nev. Ct., Clark Cty. Dec. 1, 2020), p. 33, available at <https://www.democracydocket.com/wp-content/uploads/2022/09/2022.10.31-NV-Poll-Worker-Response-to-Application-for-Mandamus-STAMPED.pdf>; Rex Briggs, “Trump Supporters Asked me to Look into Voter Fraud in Nevada; What I Found Debunked What They were Alleging,” *Nevada Independent*, (Dec. 22, 2020), available at <https://thenevadaindependent.com/article/trump-supporters-asked-me-to-look-into-voter-fraud-in-nevada-what-i-found-debunked-what-they-were-alleging>.
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80. Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol (Jared Kushner Production), JK_00115, JK00117-132 (November 12, 2020, email from Matt Oczkowski, and attached analysis of battleground states).

81. Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol (Jared Kushner Production), JK_00115, JK_00117-132 (November 12, 2020, email from Matt Oczkowski, and attached analysis of battleground states).
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83. Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol (Jared Kushner Production), JK_00115, JK_00117-132 (November 12, 2020, email from Matt Oczkowski, and attached analysis of battleground states).
84. Select Committee to Investigate the January 6th Attack on the United States Capitol, Deposition of Rudolph Giuliani (May 20, 2022), pp. 22-23.
85. Select Committee to Investigate the January 6th Attack on the United States Capitol, Deposition of Rudolph Giuliani (May 20, 2022), pp. 22-23.
86. Select Committee to Investigate the January 6th Attack on the United States Capitol, Deposition of Rudolph Giuliani (May 20, 2022), pp. 22-23.
87. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), pp. 106-107. Sidney Powell and Jenna Ellis accompanied Giuliani. The campaign was represented by Jared Kushner, Bill Stepien, David Bossie (a former senior official on President Trump's 2016 campaign), Derek Lyons, and Justin Clark. See Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Jared Kushner, (Mar. 31, 2022), pp. 50-51; Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Derek Lyons, (Mar. 17, 2022), pp. 64-65. Eric Herschmann also arrived at the campaign headquarters as the meeting was underway. See Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Eric Herschmann, (Mar. 17, 2022), pp. 160-61.
88. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), p. 109.
89. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), p. 109.
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91. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Justin Clark, (May 17, 2022), p. 63; Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Matthew Morgan, (Apr. 25, 2022), pp. 34-35.
92. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Matthew Morgan, (Apr. 25, 2022), pp. 14-16.
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98. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Justin Clark, (May 17, 2022), p. 63.

99. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Justin Clark, (May 17, 2022), p. 63.
100. "Rudy Giuliani Trump Campaign Philadelphia Press Conference at Four Seasons Total Landscaping," Rev, (Nov. 7, 2020), available at <https://www.rev.com/blog/transcripts/rudy-giuliani-trump-campaign-philadelphia-press-conference-november-7>.
101. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Bernard Kerik, (Jan. 13, 2022), pp. 30-32.
102. "Memorandum from Attorney General William Barr on Post-Voting Election Irregularity Inquiries to the United States Attorneys, to the Assistant Attorneys General for the Criminal Division, Civil Rights Division, and National Security Division, and to the Director of the Federal Bureau of Investigation," Department of Justice, (Nov. 9, 2020), available at <https://www.documentcloud.org/documents/20403358-william-barr-election-memo-november-9>. Longstanding DOJ policy had been not to conduct such investigations prior to certification to avoid impacting election results. See *Federal Prosecution of Election Offenses*, 8th ed. Department of Justice, December 2017, at 84, available at <https://www.justice.gov/criminal/file/1029066/download>.
103. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Justin Clark, (May 17, 2022), pp. 66-67; Mike Pence, *So Help Me God*, (New York: Simon & Schuster, 2022), at pp. 431-432.
104. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Justin Clark, (May 17, 2022), pp. 66-67.
105. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Justin Clark, (May 17, 2022), p. 67; Mike Pence, *So Help Me God*, (New York: Simon & Schuster, 2022), at pp. 431.
106. See Donald J. Trump (@realDonaldTrump), Twitter, Nov. 15, 2020 7:11 p.m. ET, available at <http://web.archive.org/web/20201117115935/https://twitter.com/realDonaldTrump/status/1327811527123103746> (archived).
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108. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Stepien, (Feb. 10, 2022), pp. 174-175.
109. Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol, (Mark Meadows Production), MM007112 (Nov. 14, 2020 email from Jason Miller to Bill Stepien, Justin Clark, David Bossie, Mark Meadows, and Jared Kushner describing Rudy Giuliani's surrogate briefing).
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112. Factba.se, "Interview: Brian Kilmeade of Fox News Interviews Donald Trump - December 13, 2020," Vimeo, at 7:47, Dec. 13, 2020, available at <https://vimeo.com/490517184>.
113. Select Committee to Investigate the January 6th Attack on the United States Capitol, *Hearing on the January 6th Investigation*, 117th Cong., 2d sess., (June 13, 2022), available at <https://www.govinfo.gov/committee/house-january6th>.
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116. See John Danforth, Benjamin Ginsberg, Thomas B. Griffith, et al., *Lost, Not Stolen: The Conservative Case that Trump Lost and Biden Won the 2020 Presidential Election*, (July 2022), p. 3, available at <https://lostnotstolen.org/download/378/>.
117. Complaint at 2, *Bowyer v. Ducey*, 506 F. Supp. 3d 699 (D. Ariz. Dec. 2, 2020) (No. 2:20-cv-02321), ECF No. 1.
118. *Bowyer v. Ducey*, 506 F. Supp. 3d 699, 706, 723 (D. Ariz. 2020).
119. Minute Entry and Order at 6-9, *Ward v. Jackson*, No. CV2020-015285 (Az. Sup. Ct. Dec. 4, 2020).
120. See *Ward v. Jackson*, No. CV-20-0343-AP, 2020 Ariz. LEXIS 313, at *6 (Ariz. 2020), also available at <https://www.clerkofcourt.maricopa.gov/home/showpublisheddocument/1984/637437053596970000>; Howard Fischer, “State Supreme Court rejects GOP bid to void election,” *Arizona Capitol Times*, (Dec. 8, 2020), available at <https://azcapitoltimes.com/news/2020/12/08/federal-judge-hears-arguments-in-election-challenge/>; “Meet the Justices,” Arizona Judicial Branch, (Dec. 8, 2020), available at <http://web.archive.org/web/20201208032900/https://www.azcourts.gov/meetthejustices/> (archived); “Brutinel Elected as Next Arizona Supreme Court Chief Justice,” *Associated Press*, (Nov. 20, 2018), available at <https://apnews.com/article/27b725d44d384e2cb7a0e491ac82fe7f>; Bob Christie, “Ducey Names 2 to New Arizona Supreme Court Seats,” *Associated Press*, (Nov. 28, 2016), available at <https://apnews.com/article/26fc7f154b0e4b4fb358987941ded8d0>; “Arizona Governor Appoints New Supreme Court Justice,” *Associated Press*, (Apr. 26, 2019), available at <https://apnews.com/article/4ce4bf1d79724c03b1d4cf36f4b97cf1>; Jonathan J. Cooper, “Ducey Appoints Montgomery to Arizona Supreme Court,” *Associated Press*, (Sep. 4, 2019), available at <https://apnews.com/article/bac43d42185c4b8bb9e8c465a59792c8>.
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- <https://www.gasupreme.us/court-information/biographies/justice-charles-j-bethel/>; “Justice Carla Wong McMillian,” Supreme Court of Georgia, (last accessed Dec. 3, 2022), available at <https://www.gasupreme.us/court-information/biographies/justice-carla-wong-mcmillian/>.
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 126. Complaint for Declaratory, Emergency, and Permanent Injunctive Relief, *King v. Whitmer*, Case No. 2:20-cv-13134-LVP-RSW, (E.D. Mich. Nov. 25, 2020), ECF No. 1; *King v. Whitmer*, 505 F. Supp. 3d 720, 738 (E.D. Mich. 2020). In a subsequent decision, the judge called the case “a historic and profound abuse of the judicial process” and sanctioned the attorneys who filed the lawsuit *King v. Whitmer*, 556 F. Supp. 3d 680, 688-89 (E.D. Mich. 2021).
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177. Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol (National Archives Production), 076P-R000010292_0001 (November 12, 2020, email from Tim Walberg to Molly Michel re: Additional Presidential Phone call follow up).
178. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Chad Wolf, (Jan. 21, 2022), pp. 70-74; Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol, (Department of Homeland Security Production), CTRL0000033284, (Nov. 13, 2020, email from Molly Michael to Chad Wolf titled "Re: Michigan Letter").
179. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Chad Wolf, (Jan. 21, 2022), pp. 72-74; Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol, (Department of Homeland Security Production), CTRL0000033284, (Nov. 13, 2020, email from Molly Michael to Chad Wolf titled "Re: Michigan Letter"); Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Chad Wolf, (Jan. 21, 2022), Exhibit 44, CTRL0000926977 (Nov. 13, 2020 letter to Michigan Secretary of State Jocelyn Benson from Michigan State Senators Lana Theis and Tom Barrett).
180. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Chad Wolf, (Jan. 21, 2022), pp. 74-77 Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Chad Wolf (Jan. 21, 2022), Exhibit 45, CTRL0000926978, (Nov. 16, 2020 email from Christopher Krebs responding to Chad Wolf, Matthew Travis, and Brandon Wales entitled "RE: Allegations").
181. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Chad Wolf, (Jan. 21, 2022), pp. 74-77; Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Chad Wolf (Jan. 21, 2022), Exhibit 45, CTRL0000926978, (Nov. 16, 2020 email from Christopher Krebs to Chad Wolf, Matthew Travis, and Brandon Wales entitled "RE: Allegations"); "Isolated User Error in Antrim County Does Not Affect Election Results, Has No Impact on Other Counties or States," Michigan Secretary of State, (Nov. 7, 2020), available at https://www.michigan.gov/-/media/Project/Websites/sos/30lawens/Antrim_Fact_Check.pdf?rev=7a929e4d262e4532bbe574a3b82ddbcf.
182. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Chad Wolf, (Jan. 21, 2022), pp. 78-80. Even as the acting Secretary of DHS was providing Meadows information he received from his Director of CISA debunking the Dominion claims, the acting Assistant Secretary of DHS, Ken Cuccinelli, was providing back channel information to Meadows in a possible effort to promote the false Dominion claims. See Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol (National Archives Production), TEXT0000072, TEXT0000073, (Nov. 12, 2020 text messages from Ken Cuccinelli to Mark Meadows) (Cuccinelli: "I have the dominion list of everywhere the machines are deployed that we know of. [I]t is pretty extensive. It is in my DHS email account. Where do you want me to send it?" Meadows then provided Cuccinelli with his personal email address.)
183. Chris Krebs #Protect2020 (@CISAKrebs), Twitter, Nov. 17, 2020 11:45 a.m. ET, available at <https://twitter.com/CISAKrebs/status/1328741106624901120>.
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terminated your appointment” and that “Pursuant to the direction of the President, your appointment... is hereby terminated, effective immediately”).

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190. Donald J. Trump, (@realDonaldTrump), Twitter, Nov. 19, 2020 12:41 a.m. ET and 3:47 p.m. ET, available at <https://www.thetrumparchive.com/?searchbox=%22dominion-izing%22> (archived).
191. One America News Network, “Cyber Analyst on Dominion Voting: Shocking Vulnerabilities,” YouTube, at 0:41-1:14, 1:37-2:23, 2:42-3:36, Nov. 15, 2020, available at <https://www.youtube.com/watch?v=eKcPoCNW8AA>.
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204. *Bowyer v. Ducey*, 506 F. Supp. 3d 699, 723 (D. Ariz. 2020) (finding the complaint "void of plausible allegations that Dominion voting machines were hacked or compromised in Arizona during the 2020 General Election").
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208. Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol (National Archives Production), 076P-R00001368_00001, pp. 1, 6 (Allied Security Operations Group Antrim Michigan Forensics Report, dated Dec. 13, 2020).
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 214. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Barr, (Jun. 2, 2022), pp. 29-30.
 215. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Barr, (Jun. 2, 2022), pp. 29-30.
 216. See, e.g., Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Barr, (Jun. 2, 2022), pp. 29-30.
 217. See Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol (Department of Homeland Security Production) CTRL0000915111, CTRL0000915117-CTRL0000915118 (draft analyses of ASOG report). Notably, the final version of this review, which had been requested by the Attorney General, was edited by senior DHS officials to remove the language most critical of ASOG before being sent to the Department of Justice by Acting Assistant Secretary Ken Cuccinelli. See Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol (Department of Homeland Security Production) CTRL0000915120 (emails circulating draft analyses), CTRL0000926941 (noting report was “currently in the Secretary’s office”); Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol (Department of Justice Production) HCOR-Pre-CertificationEvents-07262021-000687-HCOR-Pre-CertificationEvents-07262021-000688 (email and report provided to Donoghue by Cuccinelli); Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Richard Peter Donoghue, (Oct. 1, 2021), pp. 29-31.
 218. See Michigan Senate Oversight Committee, *Report on the November 2020 Election in Michigan*, (June 23, 2021), p. 16, available at https://misenategopcdn.s3.us-east-1.amazonaws.com/99/documents/20210623/SMPO_2020ElectionReport_2.pdf; J. Alex Halderman, *Analysis of the Antrim County, Michigan November 2020 Election Incident*, (Mar. 26, 2021), available at <https://www.michigan.gov/-/media/Project/Websites/sos/30lawens/Antrim.pdf?rev=fbfe881cdc0043a9bb80b783d1bb5fe9>.
 219. For example, President Trump and others frequently cited ASOG’s finding that the Dominion machines had a “68% error rate,” but that conclusion was based on a complete misunderstanding of the scanner log files reviewed by ASOG. Their report also claimed that, due to these perceived “errors,” a “staggering number of votes” were determined through an adjudication process that allowed for manipulation of votes, but no adjudication software was installed on the Dominion machines. J. Alex Halderman, *Analysis of the Antrim County, Michigan November 2020 Election Incident*, (Mar. 26, 2021), pp. 40-41, available at <https://www.michigan.gov/-/media/Project/Websites/sos/30lawens/Antrim.pdf?rev=fbfe881cdc0043a9bb80b783d1bb5fe9>.

220. Halderman concluded that “I am not aware of any credible evidence that any security problem was ever exploited against Antrim County’s election system. As my analysis shows, the anomalies that occurred in the November 2020 results are fully explained by human error.” J. Alex Halderman, *Analysis of the Antrim County, Michigan November 2020 Election Incident*, (Mar. 26, 2021), p. 46, available at <https://www.michigan.gov/-/media/Project/Websites/sos/30lawens/Antrim.pdf?rev=fbfe881cdc0043a9bb80b783d1bb5fe9>.
221. “Audits of the November 3, 2020 General Election,” Michigan Secretary of State, (April 21, 2021), p. 32, available at https://www.michigan.gov/-/media/Project/Websites/sos/30lawens/BOE_2020_Post_Election_Audit_Report_04_21_21.pdf?rev=a3c7ee8c06984864870c540a266177f2; “Hand Count Calculation Sheet (Office: President of the United States, County: Antrim),” Michigan Secretary of State, available at https://www.michigan.gov/-/media/Project/Websites/sos/30lawens/AntrimCounty_Presidential_Race_Full_Hand_Count_November2020.pdf?rev=0bf12f08c33444c59bd145fbcfb3e40.
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224. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Derek Lyons, (Mar. 17, 2022), pp. 21-22, 99; Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Pasquale Anthony “Pat” Cipollone, (Jul. 8, 2022), pp. 44-50.
225. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Pasquale Anthony “Pat” Cipollone, (Jul. 8, 2022), pp. 42-43.
226. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Pasquale Anthony “Pat” Cipollone, (Jul. 8, 2022), p. 50.
227. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Eric Herschmann, (Apr. 6, 2022), p. 129.
228. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Robert O’Brien, (Aug. 23, 2022), pp. 163-65.
229. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Chad Wolf, (Jan. 21, 2022), pp. 97-98, 102-103; Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Ken Cuccinelli, (Dec. 7, 2021), pp. 49-54.
230. Select Committee to Investigate the January 6th Attack on the United States Capitol, Deposition of Rudolph Giuliani (May 20, 2022), pp. 157-59; Select Committee to Investigate the January 6th Attack on the United States Capitol, Deposition of Sidney Powell, (May 7, 2022), pp. 102-03; Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol, (Jenna Ellis Production), J.007465Ellis, J.007467Ellis (December 28-29, 2020, emails with Katherine Freiss, Doug Mastriano, Christina Bobb, Giuliani, and others about accessing voting machines); Emma Brown and Jon Swaine, “Inside the Secretive Effort by Trump Allies to Access Voting Machines,” *Washington Post*, (Oct. 28, 2022), available at <https://www.washingtonpost.com/investigations/2022/10/28/coffee-county-georgia-voting-trump/>.
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 236. Select Committee to Investigate the January 6th Attack on the United States Capitol, Deposition of Rudolph Giuliani, (May 20, 2022), p. 166.
 237. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Bernard Kerik (Jan. 13, 2022), p. 182. Kerik also emailed President Trump’s chief of staff, Mark Meadows, on December 28, 2020, writing: “We can do all the investigations we want later, but if the president plans on winning, it’s the legislators that have to be moved, and this will do just that.” Document on file with the Select Committee (National Archives Production) 076P-R000004125_0001.
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250. Brad Raffensperger, *Integrity Counts* (New York: Simon & Schuster, 2021), p. 191 (reproducing the call transcript); Amy Gardner and Paulina Firozi, "Here's the Full Transcript and Audio of the Call Between Trump and Raffensperger," *Washington Post*, (Jan. 5, 2021), available at https://www.washingtonpost.com/politics/trump-raffensperger-call-transcript-georgia-vote/2021/01/03/2768e0cc-4ddd-11eb-83e3-322644d82356_story.html.
251. Brad Raffensperger, *Integrity Counts* (New York: Simon & Schuster, 2021), p. 191 (reproducing the call transcript); Amy Gardner and Paulina Firozi, "Here's the Full Transcript and Audio of the Call Between Trump and Raffensperger," *Washington Post*, (Jan. 5, 2021), available at https://www.washingtonpost.com/politics/trump-raffensperger-call-transcript-georgia-vote/2021/01/03/2768e0cc-4ddd-11eb-83e3-322644d82356_story.html.
252. Brad Raffensperger, *Integrity Counts* (New York: Simon & Schuster, 2021), p. 191 (reproducing the call transcript); Amy Gardner and Paulina Firozi, "Here's the Full Transcript and Audio of the Call Between Trump and Raffensperger," *Washington Post*, (Jan. 5, 2021), available at https://www.washingtonpost.com/politics/trump-raffensperger-call-transcript-georgia-vote/2021/01/03/2768e0cc-4ddd-11eb-83e3-322644d82356_story.html.
253. Declaration of Frances Watson at 1-3, *Pearson v. Kemp*, 831 F. App'x. 467 (N.D. Ga. 2020) (No. 1:20-cv-04809), ECF No. 72-1.
254. Declaration of Frances Watson at 1-3, *Pearson v. Kemp*, 831 F. App'x. 467 (N.D. Ga. 2020) (No. 1:20-cv-04809), ECF No. 72-1.
255. U.S. Senate Judiciary Committee, Transcribed Interview of Byung J. "BJay" Pak, (Aug. 11, 2021), pp. 14-25, available at <https://www.judiciary.senate.gov/imo/media/doc/Pak%20Transcript.pdf>; Response of the Georgia Secretary of State to the Court's Order of September 20, 2021 at 4-6, *Favorito v. Wan*, No. 2020CV343938 (Ga. Super. Ct. filed Oct. 12, 2021).
256. "Georgia Election Officials Briefing Transcript December 7: Will Recertify Election Results Today," Rev, (December 7, 2020), available at <https://www.rev.com/blog/transcripts/georgia-election-officials-briefing-transcript-december-7-will-recertify-election-results-today>; Response of the Georgia Secretary of State to the Court's Order of September 20, 2021 at 4-6, *Favorito v. Wan*, No. 2020CV343938 (Ga. Super. Ct. filed Oct. 12, 2021).
257. "Georgia Election Officials Briefing Transcript December 7: Will Recertify Election Results Today," Rev, (December 7, 2020), available at <https://www.rev.com/blog/transcripts/georgia-election-officials-briefing-transcript-december-7-will-recertify-election-results-today>; Response of the Georgia Secretary of State to the Court's Order of September 20, 2021, at 4-6 and Exhibit A: Videotaped Deposition of James P. Callaway (Deputy Chief Investigator of the Office of the Secretary of State) at 29-35, *Favorito v. Wan*, No. 2020CV343938 (Ga. Super. Ct. filed Oct. 12, 2021) available at, <https://s3.documentcloud.org/documents/21084096/favorito-sos-brief-in-response-to-order-of-92021-with-exs-a-and-b.pdf>.
258. Declaration of Frances Watson at 2-3, *Pearson v. Kemp*, 831 F. App'x. 467 (N.D. Ga. 2020) (No. 1:20-cv-04809), ECF No. 72-1; U.S. Senate Judiciary Committee, Transcribed Interview of Byung J. "BJay" Pak, (August 11, 2021), pp. 14-25, available at <https://www.judiciary.senate.gov/imo/media/doc/Pak%20Transcript.pdf>.

259. Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol, (National Archives Production), 076P-R000004670_0001-0013, 076P-R000004888_0001-0013, 076P-R000004948_0001-0013 (January 5, 2021, emails from Molly Michael re: “from POTUS” to Senators Josh Hawley and Ted Cruz and to Representative Jim Jordan attaching Background Briefing on 2020 Fraud).
260. “Transcript of Trump’s Speech at Rally Before US Capitol Riot,” *Associated Press*, (Jan. 13, 2021), available at <https://apnews.com/article/election-2020-joe-biden-donald-trump-capitol-siege-media-e79eb5164613d6718e9f4502eb471f27>.
261. *In the Matter of Rudolph W. Giuliani*, No. 2021-00506, slip op at *2, 22 (N.Y. App. Div. May 3, 2021), available at <https://int.nyt.com/data/documenttools/giuliani-law-license-suspension/1ae5ad6007c0ebfa/full.pdf>.
262. GA House Mobile Streaming, Governmental Affairs 12.10.20, Vimeo – Livestream, at 2:09:03 to - 2:13:10, available at <https://livestream.com/accounts/25225474/events/9117221/videos/214677184>.
263. Select Committee to Investigate the January 6th Attack on the United States Capitol, *Hearing on the January 6th Investigation*, 117th Cong., 2d sess., (June 21, 2022), available at <https://www.govinfo.gov/committee/house-january6th>.
264. See John Danforth, Benjamin Ginsberg, Thomas B. Griffith, et al., “Lost, Not Stolen: The Conservative Case that Trump Lost and Biden Won the 2020 Presidential Election,” (July 2022), p. 3, available at <https://lostnotstolen.org/download/378/>.
265. Opinion and Order at *6, 13, *Costantino v. Detroit*, No. 20-014780-AW (Mich. Cty. Cir. Ct. filed Nov. 13, 2020), available at <https://electioncases.osu.edu/wp-content/uploads/2020/11/Costantino-v-Detroit-Opinion-and-Order.pdf>.
266. Complaint, Exhibit 2: Affidavit of Jesse Richard Morgan at 2, 10, *Mecalf v. Wolf*, 2020 Pa. Commw. LEXIS 794 (Pa. Commw. Ct. 2020) (No. 636 MD 2020), available at <https://www.pacourts.us/Storage/media/pdfs/20210603/212420-file-10836.pdf>.
267. See, e.g., Donald J. Trump (@realdonaldtrump), Twitter, Dec. 1, 2020 2:31 p.m. ET, available at <http://web.archive.org/web/20201202014959/https://twitter.com/realdonaldtrump/status/1333856259662077954> (archived); Donald J. Trump (@realdonaldtrump), Twitter, Dec. 1, 2020 3:49 p.m. ET, available at <http://web.archive.org/web/20201201221335/https://twitter.com/realDonaldTrump/status/1333875814585282567> (archived); Donald J. Trump (@realdonaldtrump), Twitter, Dec 2, 2020 6:42 p.m. ET, available at <http://web.archive.org/web/20201203024425/https://twitter.com/realDonaldTrump/status/1334327204847775744> (archived).
268. Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Richard Peter Donoghue, (Oct. 1, 2021), p. 60; Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of William Barr, (Jun. 2, 2022), pp. 45-46.
269. FOX News, “Sean Hannity,” Nov. 19, 2020, available at https://archive.org/details/FOXNEWSW_20201120_060000_Hannity?start/1983.1.end/2077.5.
270. Brandon Waltens, “VIDEO: Wagons, Suitcases, and Coolers Roll into Detroit Voting Center at 4 AM [UPDATED],” *Texas Scorecard*, (Nov. 4, 2020), available at <https://texasscorecard.com/federal/video-wagons-suitcases-and-coolers-roll-into-detroit-voting-center-at-4-am/>; “Rudy Giuliani Trump Campaign Press Conference Transcript November 19: Election Fraud Claims,” *Rev*, (Nov. 19, 2020), at 22:29-26:53, available at <https://www.rev.com/blog/transcripts/rudy-giuliani-trump-campaign-press-conference-transcript-november-19-election-fraud-claims>.
271. Affidavit of Christopher Thomas ¶ 18, *Texas v. Pennsylvania*, 592 U.S. ____ (2020) (describing ballot delivery), available at https://www.supremecourt.gov/DocketPDF/22/220155/163387/20201210145418055_220155%20MI%20APP.pdf; see also Opinion and Order at *6, 13, *Costantino v. Detroit*, No. 20-014780-AW (Mich. Cty. Cir. Ct. filed Nov. 13, 2020), available at

- <https://electioncases.osu.edu/wp-content/uploads/2020/11/Costantino-v-Detroit-Opinion-and-Order.pdf> (relying on Christopher Thomas' affidavit to deny a petition for various relief related to allegations that the November 3, 2020 election in Michigan was fraudulent).
272. "How a WXYZ Wagon Sparked False Election Fraud Claims in Detroit," WXYZ, (Nov. 5, 2020), available at <https://www.wxyz.com/news/how-a-wxyz-wagon-sparked-false-election-fraud-claims-in-detroit>.
273. "Election Summary Report," City of Detroit, (Nov. 19, 2020), available at <https://detroitmi.gov/document/november-3-2020-general-election-official-results>.
274. A canvassing process in every State verifies that the number of voters indicated as having voted matches the number of ballots cast. If, as claimed, tens of thousands of illegitimate ballots were counted at the TCF Center in Detroit, the total number of ballots counted would be substantially higher than the total number of voters who voted, but in Detroit slightly fewer ballots were counted than voters who were listed as having voted. The net number of ballots for the City of Detroit counting boards was 21 more names than ballots, out of approximately 174,000 absentee votes cast. Michigan Secretary of State, "Audits of the November 3, 2020 General Election," (Apr. 21, 2021), p. 20, available at https://www.michigan.gov/-/media/Project/Websites/sos/30lawens/BOE_2020_Post_Election_Audit_Report_04_21_21.pdf?rev=a3c7ee8c06984864870c540a266177f2.
275. Approximately 4.2 million ballots were cast in-person on election day and 2.6 million mail and absentee ballots were cast. See "Pennsylvania's Election Stats," Pennsylvania Department of State, (accessed Dec. 4, 2022), available at <https://www.dos.pa.gov/VotingElections/BEST/Pages/BEST-Election-Stats.aspx>; "Official Returns – 2020 Presidential Election," Pennsylvania Department of State, (accessed Dec. 4, 2022), available at <https://www.electionreturns.pa.gov/General/SummaryResults?ElectionID=83&ElectionType=G&IsActive=0>.
276. Donald J. Trump, (@realDonaldTrump), Twitter, Nov. 28, 2020 12:09 a.m. ET, available at <http://web.archive.org/web/20201128080915/https://twitter.com/realDonaldTrump/status/1332552283553476608> (archived), retweeting Senator Doug Mastriano (@SenMastriano), Twitter, Nov. 27, 2020, 1:59 p.m. ET, available at <https://twitter.com/SenMastriano/status/1332398733401591808>.
277. Jessica Calefati, "Fact-Checking False Claims about Pennsylvania's Presidential Election by Trump and His Allies," *Philadelphia Inquirer*, (Dec. 7, 2020), available at <https://www.inquirer.com/politics/election/pennsylvania-election-results-trump-fraud-fact-check-20201206.html>.
278. Donald J. Trump (@realDonaldTrump), Twitter, Dec. 28, 2020, 4:00 p.m. ET, available at <http://web.archive.org/web/20201228211304/https://twitter.com/realdonaldtrump/status/1343663159085834248> (archived); Donald J. Trump (@realDonaldTrump), Twitter, Dec. 29, 2020, 8:59 a.m. ET, available at <http://web.archive.org/web/20201229205204/https://twitter.com/realdonaldtrump/status/1343919651336712199> (archived); Donald J. Trump (@realDonaldTrump), Twitter, Dec. 29, 2020, 5:55 p.m. ET, available at <http://web.archive.org/web/20201229225512/https://twitter.com/realdonaldtrump/status/1344054358418345985>. Note that timestamps in archived tweets may reflect a time zone different from that where the tweet originated.
279. See Pennsylvania House Republican Caucus, "PA Lawmakers: Numbers Don't Add Up, Certification of Presidential Results Premature and In Error," (Dec. 28, 2020), available at <https://www.pahousegop.com/News/18754/Latest-News/PA-Lawmakers-Numbers-Don%E2%80%99t-Add-Up,-Certification-of-Presidential-Results-Premature-and-In-Error>. Representative Ryan also promoted the groundless claim of an unexplained discrepancy of 400,000 mail-in ballots in the state's database, which was based entirely on his ignorance of the fact that the database in question accounts for mail-in ballots and absentee ballots separately. Senate Committee on Homeland Security & Governmental Affairs, Examining Irregularities in the 2020 Election, (Dec. 16, 2020), Written Testimony of Pennsylvania State

- Representative Frank Ryan, available at <https://www.hsgac.senate.gov/imo/media/doc/Testimony-Ryan-2020-12-16.pdf>; Senate Committee on Homeland Security & Governmental Affairs, *Examining Irregularities in the 2020 Election*, (Dec. 16, 2020), Letter Submitted by Pennsylvania Secretary of the Commonwealth Kathy Boockvar, available at <https://www.dos.pa.gov/about-us/Documents/statements/2020-12-16-Senator-Johnson-and-Peters.pdf>.
280. “Dept. of State: Republicans’ Election Claims Are ‘Repeatedly Debunked Conspiracy Theories,’” WJAC-TV, (Dec. 29, 2020), available at <https://wjactv.com/news/local/dept-of-state-republicans-election-claims-are-repeatedly-debunked-conspiracy-theories>.
281. Senate Committee on the Judiciary, *Transcribed Interview of Richard Donoghue*, (Aug. 6, 2021), p. 156, available at <https://www.judiciary.senate.gov/imo/media/doc/Donoghue%20Transcript.pdf>.
282. See “Donald Trump Rally Speech Transcript Dalton, Georgia: Senate Runoff Election,” Rev, (Jan. 4, 2021), at 58:09, available at <https://www.rev.com/blog/transcripts/donald-trump-rally-speech-transcript-dalton-georgia-senate-runoff-election>; “Transcript of Trump’s Speech at Rally Before US Capitol Riot,” *Associated Press* (January 13, 2021), available at <https://apnews.com/article/election-2020-joe-biden-donald-trump-capitol-siege-media-e79eb5164613d6718e9f4502eb471f27>.
283. Select Committee to Investigate the January 6th Attack on the United States Capitol, *Transcribed Interview of William Barr*, (Jun. 2, 2022), p. 29; Affidavit of Russell James Ramsland, Jr., 556 F. Supp. 3d. 680, 724 (E.D. Mich. 2021), ECF 6-24, available at <https://www.courtlistener.com/docket/18693929/6/24/king-v-whitmer/>. Ramsland submitted a similar affidavit in a case in Georgia. See Affidavit of Russell Ramsland, *Wood v. Raffensperger*, 501 F. Supp. 3d 1310 (N.D. Ga. 2020), ECF No. 7-1.
284. Affidavit of Russell Ramsland, *Wood v. Raffensperger*, 501 F. Supp. 3d 1310 (N.D. Ga. 2020), ECF No. 7-1.
285. Aaron Blake, “The Trump Campaign’s Much-Hyped Affidavit Features a Big, Glaring Error,” *Washington Post*, (Nov. 20, 2020), available at <https://www.washingtonpost.com/politics/2020/11/20/trump-campaigns-much-hyped-affidavit-features-big-glaring-error/>.
286. For example, Ramsland claimed 781.91% turnout in North Muskegon (actual turnout: 77.78%); 460.51% turnout in Zeeland Charter Township (actual turnout: 80.11%); and 139.29% turnout in Detroit (actual turnout: 50.88%). See *King v. Whitmer*, 556 F. Supp. 3d. 680, 724 (E.D. Mich. 2021); Michigan Senate Oversight Committee, *Report on the November 2020 Election in Michigan*, (June 23, 2021), available at https://misenategopcdn.s3.us-east-1.amazonaws.com/99/documents/20210623/SMPO_2020ElectionReport_2.pdf.
287. See, e.g., “Transcript of Trump’s Speech at Rally Before US Capitol Riot,” *Associated Press*, (Jan. 13, 2021), available at <https://apnews.com/article/election-2020-joe-biden-donald-trump-capitol-siege-media-e79eb5164613d6718e9f4502eb471f27>; “Donald Trump Speech on Election Fraud Claims Transcript December 2” Rev (Dec. 2, 2020), available at <https://www.rev.com/blog/transcripts/donald-trump-speech-on-election-fraud-claims-transcript-december-2>; Donald J. Trump (@realDonaldTrump), Twitter, Dec. 3, 2020, 4:11 p.m. ET, available at <http://web.archive.org/web/20201203211154/https://twitter.com/realdonaldtrump/status/1334606278388277253> (archived); “Trump Lawyers Rudy Giuliani & Jenna Ellis Testify Before Michigan House Oversight Committee: Full Transcript,” Rev, (Dec. 3, 2020), at 26:13, available at <https://www.rev.com/blog/transcripts/trump-lawyers-rudy-giuliani-jenna-ellis-testify-before-michigan-house-oversight-committee-transcript>; Affidavit of Mellissa A. Carone, *King v. Whitmer*, 505 F. Supp. 3d 720 (E.D. Mich. 2020), ECF No. 1-5, available at <https://www.courtlistener.com/docket/18693929/1/5/king-v-whitmer/>.
288. See, e.g., Opinion and Order at *3, 12-13, *Costantino v. Detroit*, No. 20-014780-AW (Mich. Cty. Cir. Ct. filed Nov. 13, 2020), available at <https://electioncases.osu.edu/wp-content/uploads/2020/11/Costantino-v-Detroit-Opinion-and-Order.pdf>; Affidavit of Christopher Thomas ¶¶ 2-18, *Texas v. Pennsylvania*, 592 U.S. ____ (2020) (describing his experience and

the process for tabulating votes), available at https://www.supremecourt.gov/DocketPDF/22/220155/163387/20201210145418055_220155%20MI%20APP.pdf.

289. See, e.g., “Transcript of Trump’s Speech at Rally Before US Capitol Riot,” *Associated Press* (January 13, 2021), available at <https://apnews.com/article/election-2020-joe-biden-donald-trump-capitol-siege-media-e79eb5164613d6718e9f4502eb471f27>; Rudy Giuliani’s Common Sense, “I CAN’T SAY THIS On National Television | Rudy Giuliani | Ep. 98,” Rumble, at 13:10 – 13:25, Dec. 30, 2020, available at <https://rumble.com/vex72l-i-cant-say-this-on-national-television-rudy-giuliani-ep.-98.html>.
290. Right Side Broadcasting Network, “LIVE: Georgia House Hearing on Election Fraud, Brad Raffensperger to Participate 12/23/20,” YouTube, at 27:28, 43:02-43:28, Dec. 23, 2020, available at <https://www.youtube.com/watch?v=R4cuakECmuA&t=2582s> (Testimony of Ryan Germany, counsel to Georgia Secretary of State, before Georgia legislature stating: “The total number of underage people who voted is zero. We were able to look at everyone who voted and look at their birthdate in the voter registration system, and I think there was four people who requested a ballot before they turned 18, and they all turned 18 prior to November 3rd, which means they’re allowed to vote.”).
291. See, e.g. Bannon’s War Room, “Episode 980 – The Border Tipping Point ... Peter Navarro on the Stolen Election and Desperation in Del Rio,” Rumble, May 27, 2021, available at <https://rumble.com/vhpam3-episode-980the-border-tipping-pointpeter-navarro-on-the-stolen-election-and.html>; Bannon’s War Room, “Episode 979 – The HQ of the Runaway Train ... Rachel Maddow’s Anna Karenina Moment,” Rumble, May 27, 2021, available at <https://rumble.com/vhp8yn-episode-979-the-hq-of-the-runaway-train-rachel-maddows-anna-karenina-moment.html>; Right Side Broadcasting Network, “LIVE: Arizona State Legislature Holds Public Hearing on 2020 Election,” YouTube, at 2:06:33-2:07:02, Nov. 30, 2020, available at <https://www.youtube.com/watch?v=rri6flxXww>.
292. “Proof of Citizenship Requirements,” Arizona Secretary of State, (accessed Dec. 4, 2022), available at <https://azsos.gov/elections/voting-election/proof-citizenship-requirements>. In 2013, the Supreme Court struck down Arizona’s “evidence-of-citizenship” requirement as applied to federal elections. See *Arizona v. Inter Tribal Council of Arizona, Inc.*, 570 U.S. 1, 4, 19 (2013). Arizona law allows voters to register as “federal only” voters without proof of citizenship, but those voters must provide a driver’s license or Social Security Number, which is then checked by election officials against immigration records before the person is added to voter registration rolls. Daniel González, “Are Undocumented Immigrants Voting Illegally in Arizona?,” *Arizona Republic*, (Oct. 27, 2016), available at <https://www.azcentral.com/story/news/politics/elections/2016/10/27/voter-fraud-undocumented-immigrants-voting-illegally-arizona-donald-trump/91703916/>.
293. Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol, (Mark Meadows Production), MM007288, (November 13, 2020, email from Bill Stepien to Mark Meadows, Justin Clark, and Jason Miller re: AZ Federal ID Voters); In the Matter of Rudolph W. Giuliani, No. 2021-00506, slip op at *23-25 (N.Y. App. Div. May 3, 2021), available at <https://int.nyt.com/data/documenttools/giuliani-law-license-suspension/1ae5ad6007c0ebfa/full.pdf>.
294. Brad Raffensperger, *Integrity Counts* (New York: Simon & Schuster, 2021), p. 191 (reproducing the call transcript); Amy Gardner and Paulina Firozi, “Here’s the Full Transcript and Audio of the Call Between Trump and Raffensperger,” *Washington Post*, (Jan. 5, 2021), available at https://www.washingtonpost.com/politics/trump-raffensperger-call-transcript-georgia-vote/2021/01/03/2768e0cc-4ddd-11eb-83e3-322644d82356_story.html.
295. For example, the President alleged in his January 6th speech that large numbers of ballots were cast on behalf of dead people not just in Georgia but also in Michigan, Nevada, and Pennsylvania. “Transcript of Trump’s Speech at Rally Before US Capitol Riot,” *Associated Press* (January 13, 2021), <https://apnews.com/article/election-2020-joe-biden-donald-trump-capitol-siege-media-e79eb5164613d6718e9f4502eb471f27>; See also Rudy Giuliani’s Common Sense, “I CAN’T SAY THIS On National Television | Rudy Giuliani | Ep. 98,” Rumble,

- at 15:10-15:46, (Dec. 30, 2020, reposted Mar. 22, 2021), available at <https://rumble.com/vex72l-i-cant-say-this-on-national-television-rudy-giuliani-ep.-98.html> (making similar claims).
296. Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol, (Alex Cannon Production) AC-0013946, (November 12, 2020, email from Alex Cannon to Matt Wolking, Zach Parkinson, Tim Murtaugh, Ali Pardo, Matthew Morgan, and Andrew Clark titled “Re: dead voters”); Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol, (Tim Murtaugh Production) XXM-0009451 (November 8, 2020, email from Jason Miller to Zach Parkinson, Tim Murtaugh, and Matt Wolking re: PA Death Data stating that quality control checks will “significantly decrease[]” the number of “possible dead voters”), XXM-0009467 (November 8, 2020, email from Jason Miller to Zach Parkinson, Tim Murtaugh, and Matt Wolking re: GA Dead Voters), XXM-0009566 (November 9, 2020 email from Zach Parkinson to Jason Miller, Tim Murtaugh, and Matt Wolking re PA Death Data noting there “may be errors” with their data about people who were dead voters); Mark Niesse, “Alleged ‘Dead’ Georgia Voters Found Alive and Well after 2020 Election,” *Atlanta Journal-Constitution*, (Dec. 27, 2021), available at <https://www.ajc.com/politics/alleged-dead-georgia-voters-found-alive-and-well-after-2020-election/DAL3VY7NFNHL5OREMHD7QECOCA/>.
 297. Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol, (National Archives Production), TEXT0000198, (December 3, 2020, text message from Eric Herschmann to Mark Meadows).
 298. Documents on file with the Select Committee to Investigate the January 6th Attack on the United States Capitol, (National Archives Production), TEXT0000198-203, (December 3, 2020, text messages between Eric Herschmann and Mark Meadows).
 299. Final Order at 5-6, *Boland v. Raffensperger*, No.2020CV343018 (Ga. Super. Ct. filed Dec. 14 2020), available at <https://electioncases.osu.edu/wp-content/uploads/2020/11/Boland-v-Raffensperger-Order-Dismissing-Complaint.pdf>.
 300. The expert, Bryan Geels, based his claims on a comparison of public voter information to public death records. See Documents on file with the Select Committee to Investigate the January 6th Attack on the U.S. Capitol (Christina Bobb Production), BOBB_CONG_00000683-84, 692-93, 706-07 (Affidavit of Bryan Geels dated Dec. 1, 2020, in *Trump v. Barron*, a case filed by the Trump Campaign in a Georgia Superior Court in Fulton County). However, the records reviewed included only name and year of birth for each individual listed. *Id.* at ¶ 28. Based on this limited information, it was impossible for Geels (or anyone else) to conclude that the person with a particular name and birth year was the same person listed in public death records with that name and birth year. See *id.*, at ¶ 50 (only the Secretary of State has the information to conduct a full analysis of this issue); see also Declaration of Charles Stewart III at 22, *Trump v. Raffensperger*, No. 2020CV33255 (Ga. Super. Ct. filed Dec. 14, 2020).
 301. In Georgia, the Secretary of State found four cases where people voted in the names of deceased individuals. Mark Niesse, “Alleged ‘Dead’ Georgia Voters Found Alive and Well after 2020 Election,” *Atlanta Journal-Constitution*, (Dec. 27, 2021), available at <https://www.ajc.com/politics/alleged-dead-georgia-voters-found-alive-and-well-after-2020-election/DAL3VY7NFNHL5OREMHD7QECOCA/>; In Arizona, the Attorney General recently concluded its investigation into claims of supposed dead voters in the 2020 election and found only one instance in which a vote was cast on behalf of a person who died prior to the election. Mark Brnovich, Arizona Attorney General to The Honorable Karen Fann, Arizona Senate President, (Aug. 1, 2022), available at <https://www.azag.gov/sites/default/files/2022-08/Letter%20to%20Fann%20-%20EIU%20Update%20080122.pdf>. In Michigan, the Senate Oversight Committee found only two instances in which votes were cast in the names of dead people: one was a clerical error (poll worker attributed vote to deceased father of person with same name residing at same address) and the other was a woman who died four days before the election but had sent in her absentee ballot before her death. Michigan Senate Oversight Committee, *Report on the November 2020 Election in*

- Michigan*, (June 23, 2021), available at https://misenategopcdn.s3.us-east-1.amazonaws.com/99/documents/20210623/SMPO_2020ElectionReport_2.pdf.
302. In an email obtained by the Select Committee, Katherine Friess, a lawyer who worked closely with Giuliani, shared this information with Giuliani and noted, "I don't think this makes a particularly strong case." Documents on file with the Select Committee to Investigate the January 6th Attack on the U.S. Capitol (Christina Bobb Production), BOBB_CONG_00000621 (January 4, 2021, email from Katherine Friess re: Chairman Graham dead votes memo for your consideration).
 303. Documents on file with the Select Committee to Investigate the January 6th Attack on the U.S. Capitol (Cleta Mitchell Production), CM00026036 (January 5, 2021 email from Cleta Mitchell to Richard Perry re: GA Data request by Senator Graham); Documents on file with the Select Committee to Investigate the January 6th Attack on the U.S. Capitol (Christina Bobb Production), BOBB_CONG_00000621 (January 4, 2021, email from Katherine Friess re: Chairman Graham dead votes memo for your consideration); Select Committee to Investigate the January 6th Attack on the United States Capitol, Transcribed Interview of Christina Bobb, (Apr. 21, 2022), pp. 141-42.
 304. Documents on file with the Select Committee to Investigate the January 6th Attack on the U.S. Capitol (Christina Bobb Production), BOBB_CONG_00000621 (January 4, 2021, email from Katherine Friess re: Chairman Graham dead votes memo for your consideration).
 305. ABC News, "Lindsey Graham Delivers Remarks on Capitol Breach," YouTube, at 3:05-3:30, Jan. 6, 2021, available at https://www.youtube.com/watch?v=JKHkYlRm_XM.
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 307. Order Re Privilege of Remaining Documents at 17, *Eastman v. Thompson*, No. 8:22-cv-99-DOC_DFM, (Oct. 19, 2022), ECF no. 372, available at <https://www.courtlistener.com/docket/62613089/372/john-c-eastman-v-bennie-g-thompson/>.
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 309. "Transcript of Trump's Speech at Rally Before US Capitol Riot," *Associated Press*, (Jan. 13, 2021), <https://apnews.com/article/election-2020-joe-biden-donald-trump-capitol-siege-media-e79eb5164613d6718e9f4502eb471f27>.
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