

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

Laura Pressley, Robert Bagwell, Teresa Soll,
Thomas Korkmas, and Madelon Highsmith,

Plaintiffs,

v.

JANE NELSON, in her official capacity as the
Texas Secretary of State, CHRISTINA ADKINS,
in her official capacity as Director of the Elections
Division of the Texas Secretary of State,
BRIDGETTE ESCOBEDO, in her official
capacity as Williamson County Elections
Administrator; DESI ROBERTS, in his official
capacity as Bell County Elections Administrator,
and ANDREA WILSON, in her official capacity
as Llano County Elections Administrator,

Defendants.

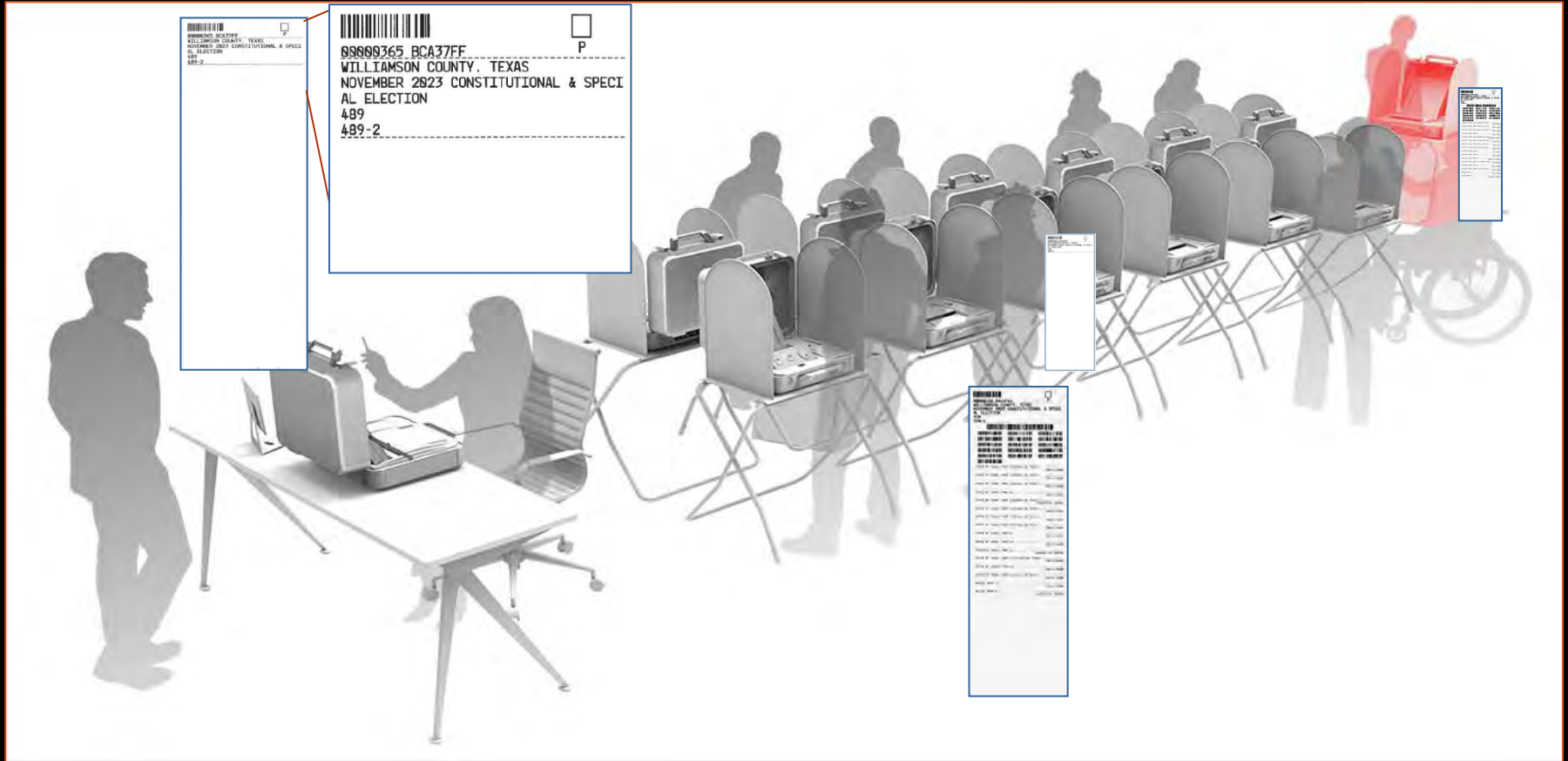
Civil Action No. _____

PLAINTIFF'S ORIGINAL COMPLAINT
FOR DECLARATORY AND INJUNCTIVE RELIEF

Demonstration by Dr. Laura Pressley, Ph.D.
Williamson County Election Record Analyses – Nov. 2023 Ballot Secrecy Breach

Williamson County – In Person Voting at Polls

Voting System Layout and Flow



Ballot Number Tracking Through Voting System Software

Texas Secretary of State Election Advisory 2019-23

Provides for Ballot Number Tracking Through Voting System Software

 Texas Secretary of State
Jane Nelson

Election Advisory No. 2019-23

To: All Election Officials

From: Keith Ingram, Director of Elections



Date: October 23, 2019

RE: Electronic Voting System Procedures Advisory

- b. **Ballot Tracking Through the Voting System Software**: The procedures below have been approved by the Secretary of State's office as a means of fulfilling ballot numbering requirements through the system software and/or the use of additional peripheral devices. Any vendor seeking to utilize a software solution for ballot numbering must have their solution approved by the Secretary of State.
- i. **ES&S ExpressVote – Tracking Ballot Numbers Through the ExpressVote Activation Card Printer/ExpressLink Software**
1. Each ExpressVote Activation card printer that is assigned to a specific polling place will be given a two to three digit alpha code. This code will be printed on each Ballot Card as it is generated for the voter.
 2. In addition to the alpha code, each polling place will print a randomly generated serial number between 1 to 99,999 on the card along with the identifying information related to the election.
 3. The system will generate a report showing which ballots (based on their serial number) were used at each location. This report must be retained with your precinct election records.
 4. For tracking purposes, you will continue to have the presiding judge fill out the [Ballot Register \(PDF\)](#), and the original and duplicate forms will be returned in the applicable envelopes. The ballots shall be tracked, distributed, and retained just as you would with a traditional pre-printed full ballot in accordance with Sections 51.006, 51.007, 51.008 with the exception of notating the serial number of the ballot ranges.

Williamson County – In Person Voting at Polls Ballot Number Assignment

Enlargement of Printed Ballot Given to Voter From ES&S ExpressVote Printer



00000158 BAH6F66



Random Number
Assigned to
Voter's Ballot

WILLIAMSON COUNTY, TEXAS
NOVEMBER 2023 CONSTITUTIONAL & SPECI
AL ELECTION
310
310-1

Williamson County – In Person Voting at Polls Tenex Pollbook and ES&S ExpressLink and Ballot Printer



Wireless Tenex
Pollbook Touchpad



Wireless Tenex
Print Server

ES&S ExpressVote
Ballot Card Printer

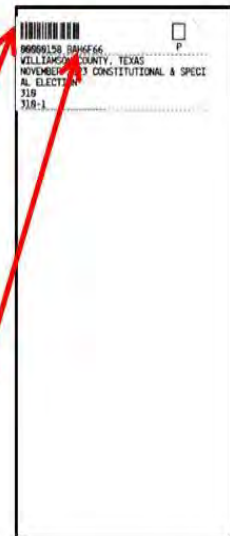


- Wireless voter check-in (voter ID, name, address)
- ES&S ExpressLink software licensed and loaded
- Assigns voting system computerized ballot number
- Assigns ballot barcode for ES&S ExpressVote
- Commands print server to communicate with ES&S ExpressVote ballot card printer to print barcode and computerized number on ballot card



- Wireless
- Accepts commands from Tenex Pollbook sends commands to ES&S ballot printer

- Connects to wireless print server
- Prints barcode on ballot
- Prints computerized no. on ballot
- Prints additional information



Texas Public Information Request – Election Records

Texas Election Code Sections 1.012(d) and (f)

1. [REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]

Public Information Requests to Williamson County (1-5)

From: laura.pressley.truetexaselections@startmail.com <laura.pressley.truetexaselections@startmail.com>
 Sent: Thursday, December 7, 2023 8:46 PM
 To: piarequest <piarequest@wilco.org>
 Cc: Allyssa Delgadillo <allyssa.delgadillo@wilco.org>; Ariane Flores <ariane.flores@wilco.org>; Corby Holcomb <corby.holcomb@wilco.org>; Ariane Flores <ariane.flores@wilco.org>; Kerstin Siptak <kerstin.siptak@wilco.org>; Peggy Vasquez <pvasquez@wilco.org>
 Subject: [REDACTED]

Dear Williamson County Elections and Public Information Request Division of Williamson County,

Please consider this a records request pursuant to Tex. Elec. Code Section 1.012(a) and (d).

Please produce [REDACTED]
 day for the November 2023 Williamson County elections. These [REDACTED]
 according to the Sec. of State Election Advisory No. 2019-23 Section 13
 generate a [REDACTED]

According to the Tex. Elec. Code Section 1.012(e), these records must be produced for a fee of less than \$50. If you would please

Laura Pressley, Ph.D.
 Founder, True Texas Elections, LLC
 313-720-6471

"Occupy till I come" - Luke 19:13
 "As for those who persist in sin...rebuke them" - 1 Timothy 5:20
 "Be not afraid nor dismayed...for the battle is not yours, but God's." - 2Chron

From: piarequest <piarequest@wil...> 1 attachment Wednesday 20 December 2023 at 11:4

Re: [REDACTED]

To: laura.pressley.truetexaselections@startmail.com
 Allyssa Delgadillo Ariane Flores Dianne Flores Corby Holcomb Peggy Vasquez
 Cc: Michael Brunger Reva Trainor-Collis

Good morning Ms. Pressley,
 With regard to your request, please find responsive information attached. This request is now closed.
 Please feel free to contact us with any questions.

Kerstin Siptak
 Executive Legal Assistant to Ariane Flores
 Williamson County Attorney's Office

Public Information Requests to Williamson County (1-5)

From: Terry Soil <tascreates@aol.com>
Sent: Saturday, December 9, 2023 6:17 PM
To: piarequest <piarequest@wilco.org>
Subject: Open Records Request for Elections Administration

You don't often get email from tascreates@aol.com. Learn why this is important.

EXTERNAL email: Exercise caution when opening.

Good morning,
Attention: Jessica Morrison
Public Request for Information
November 15, 2023
Teresa Soil
102 Tangle Ridge Lane
Georgetown TX, 78633
210-323-5346
Tascreates@aol.com

Open Records Request for Williamson County Elections Department

3, 6, 7, 8
41, 42, 43, 44
45, 46, 47, 48
61, 62, 63, 64
73, 74, 75, 76
77, 78, 79, 80
174, 175, 176
Terry Soil
Williamson County GOP Precinct 394 Chair Tascreates@aol.com
210-323-5346 There are no Mistakes Only Opportunit

Good afternoon.

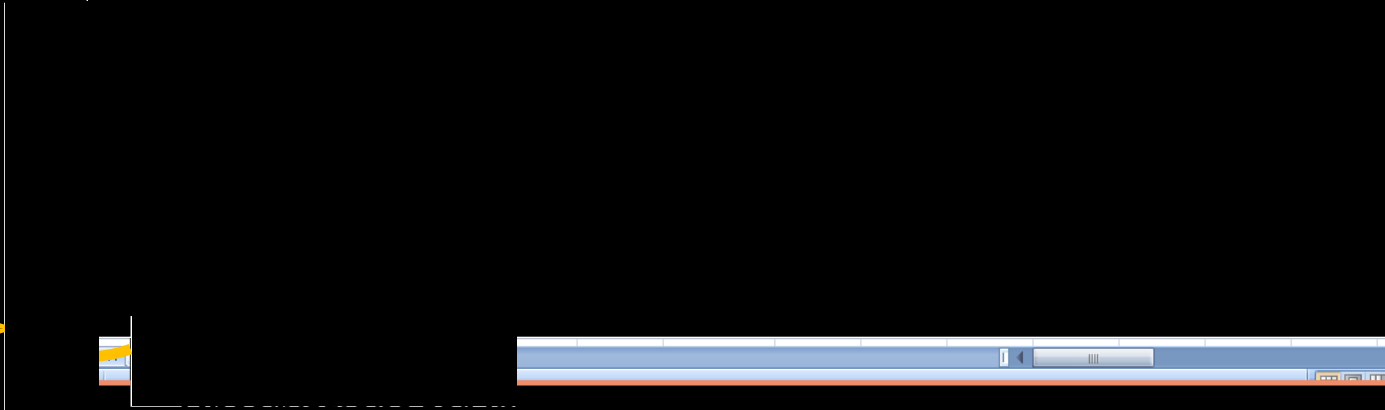
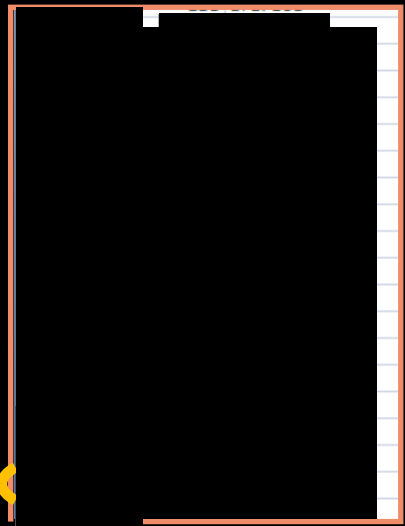
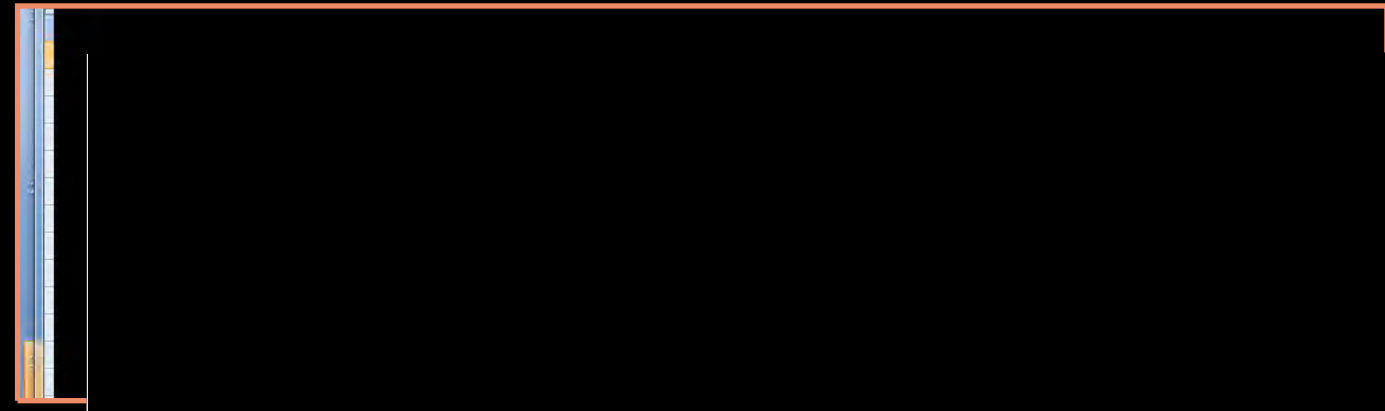
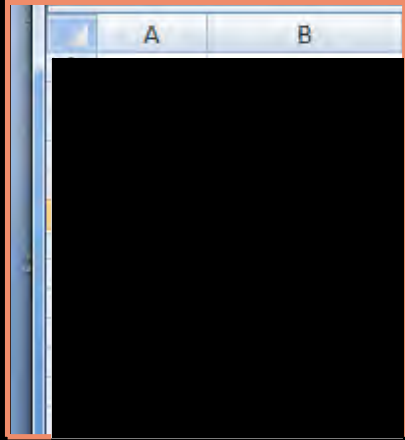
With regard to your request, please be advised that the responsive information for your request exceeded 20mb [REDACTED] and below a link where you can access and download the responsive information: [REDACTED]

If you should have any questions, please do not hesitate to contact us.

Thank you,

Dianne M. Flores
Civil Legal Assistant
Williamson County Attorney's Office

Public Information Request Productions



Public Information Requests to Williamson County

From: Robert Bagwell <Rcbag@protonmail.com>

Sent: Tuesday, November 21, 2023 10:54 AM

To: piarequest <piarequest@wilco.org>

Subject: PIA Request

EXTERNAL email: Exercise caution when opening.

Dear Sir / Madam,

I am formally requesting the following:

- 15. Voting Unit, Ballot Style, District Type Report. For the November 7th 2023 election.
- 16. Excel list of SOS_VoterID and their corresponding BS used to provide the information to the website so when the voter searches for their sample ballot they are given the correct one for the November 7th 2023 election.

location. I am requesting this report for the November 7th 2023 election.

- 20. According to the SOS Election Advisory No. 2019-23, Section 13 Ballot Number and Ballot Signature 1.1.6. 'Additional Documentation Procedures: At the conclusion of the election, the general custodian of election records should print or generate a full list of ballot numbers issued at each corresponding polling place.' I am requesting this information for the November 7th 2023 election.

Sincerely,
Robert Bagwell

----- Forwarded Message -----

From: piarequest <piarequest@wilco.org>

Date: On Wednesday, December 13th, 2023 at 2:57 PM

Subject: Re: [REDACTED] Request for Clarification

To: Robert Bagwell <Rcbag@protonmail.com>

CC: Allyssa Delgadillo <allyssa.delgadillo@wilco.org>, Ariane Flores <ariane.flores@wilco.org>, Dianne Flores <DMFlores@wilco.org>, Kerstin Siptak <kerstin.siptak@wilco.org>, Corby Holcomb <corby.holcomb@wilco.org>, Peggy Vasquez <pvazquez@wilco.org>, Reva Trainor-Collis <reva.trainor-collis@wilco.org>

Mr. Bagwell,

I called and left you a voicemail with more updates on your case. With regard to your request, for numbers 1-3, 6-11, 14, and 16-18, please be advised that the responsive information for your request exceeded 20mb in size. Please find below a link where you can access and download the responsive information: [2023-1413-PIA](#)


Public Information Request Productions

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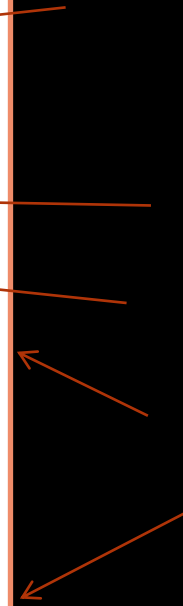
00000372 BAP1885
 WILLIAMSON COUNTY, TEXAS
 NOVEMBER 2023 CONSTITUTIONAL & SPECIAL ELECTION
 491
 491-2



STATE OF TEXAS, PROP 1/ESTADO DE TEXAS..... FOR/A FAVOR
 STATE OF TEXAS, PROP 2/ESTADO DE TEXAS..... FOR/A FAVOR
 STATE OF TEXAS, PROP 3/ESTADO DE TEXAS..... AGAINST/EN CONTRA
 STATE OF TEXAS, PROP 4..... FOR/A FAVOR
 STATE OF TEXAS, PROP 5/ESTADO DE TEXAS..... FOR/A FAVOR
 STATE OF TEXAS, PROP 6/ESTADO DE TEXAS..... FOR/A FAVOR
 STATE OF TEXAS, PROP 7/ESTADO DE TEXAS..... AGAINST/EN CONTRA
 STATE OF TEXAS, PROP 8/ESTADO DE TEXAS..... FOR/A FAVOR
 STATE OF TEXAS, PROP 9..... FOR/A FAVOR
 STATE OF TEXAS, PROP 10..... FOR/A FAVOR
 STATE OF TEXAS, PROP 11..... FOR/A FAVOR
 STATE OF TEXAS, PROP 12/ESTADO DE TEXAS..... NO SELECTION
 STATE OF TEXAS, PROP 13..... FOR/A FAVOR
 STATE OF TEXAS, PROP 14/STATE OF TEXAS..... FOR/A FAVOR
 WILCO, PROP A..... FOR/A FAVOR
 WILCO, PROP B..... FOR/A FAVOR
 ROUND ROCK ISD, PROP A..... FOR/A FAVOR

 P

00000372 BAP1885
 WILLIAMSON COUNTY, TEXAS
 NOVEMBER 2023 CONSTITUTIONAL & SPECIAL ELECTION
 491
 491-2



Public Information Request Productions

Need 3 files to Determine How Williamson County Voters Vote




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 WILLIAMSON COUNTY, TEXAS
 NOVEMBER 2823 CONSTITUTIONAL & SPECI
 AL ELECTION
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 491-2



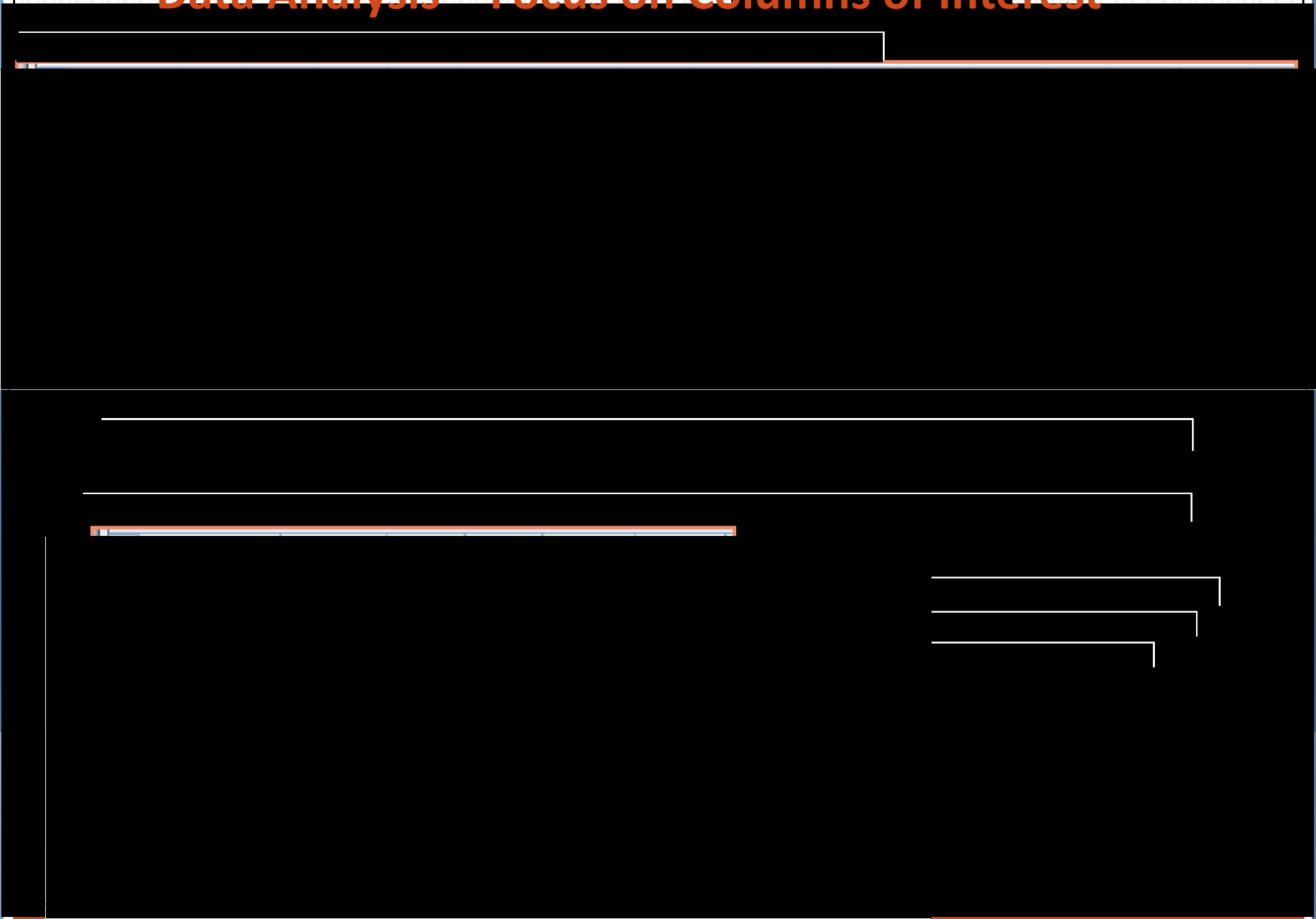
STATE OF TEXAS, PROP 1/ESTADO DE TEXAS.....	FDR/A FAVOR
STATE OF TEXAS, PROP 2/ESTADO DE TEXAS.....	FDR/A FAVOR
STATE OF TEXAS, PROP 3/ESTADO DE TEXAS.....	AGAINST/EN CONTRA
STATE OF TEXAS, PROP 4.....	FDR/A FAVOR
STATE OF TEXAS, PROP 5/ESTADO DE TEXAS.....	FDR/A FAVOR
STATE OF TEXAS, PROP 6/ESTADO DE TEXAS.....	FDR/A FAVOR
STATE OF TEXAS, PROP 7/ESTADO DE TEXAS.....	AGAINST/EN CONTRA
STATE OF TEXAS, PROP 8/ESTADO DE TEXAS.....	FDR/A FAVOR
STATE OF TEXAS, PROP 9.....	FDR/A FAVOR
STATE OF TEXAS, PROP 10.....	FDR/A FAVOR
STATE OF TEXAS, PROP 11.....	FDR/A FAVOR
STATE OF TEXAS, PROP 12/ESTADO DE TEXAS.....	NO SELECTION

Algorithmic Pattern Discovered

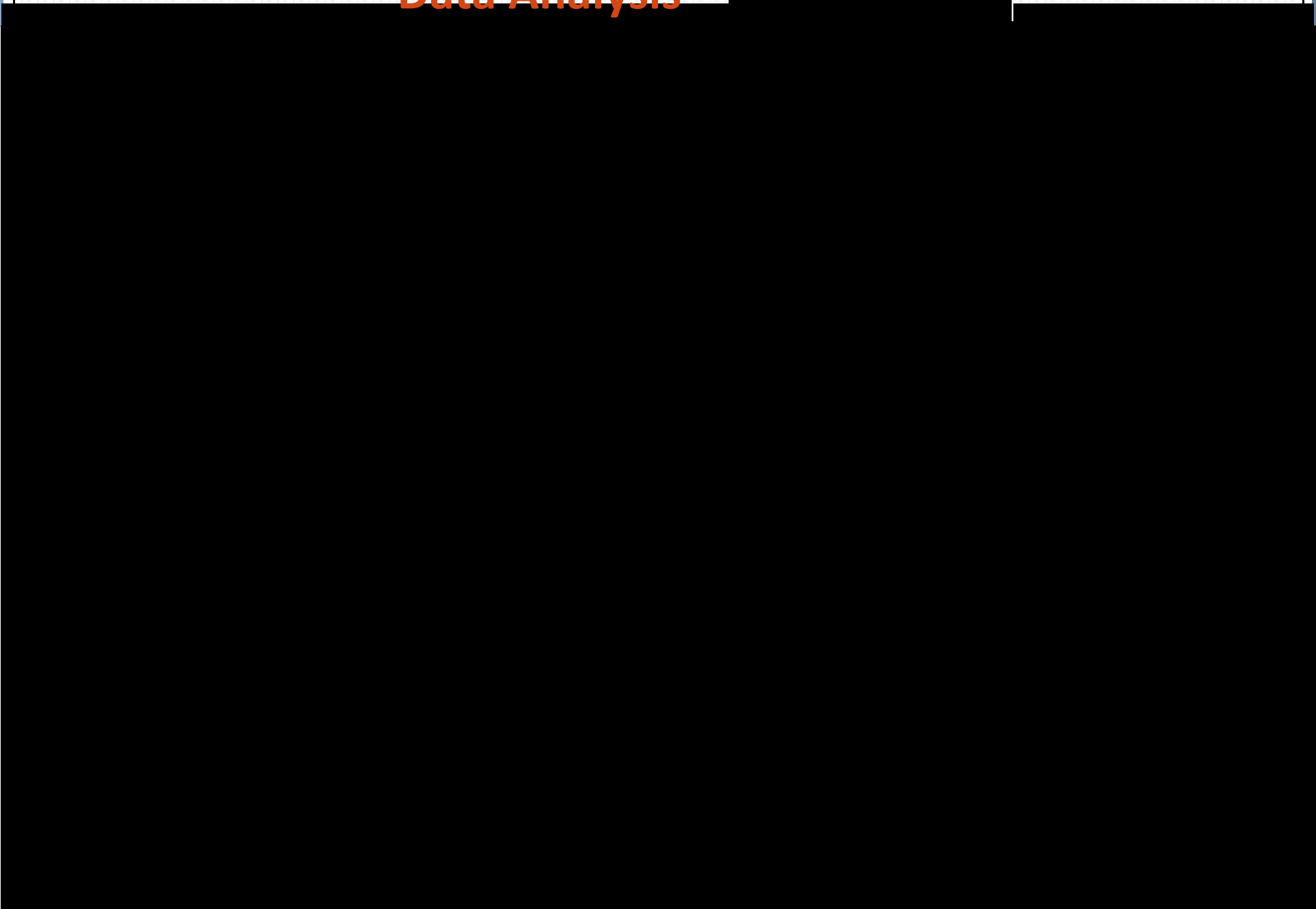
Data Analysis - Filtering



Data Analysis – Focus on Columns of Interest

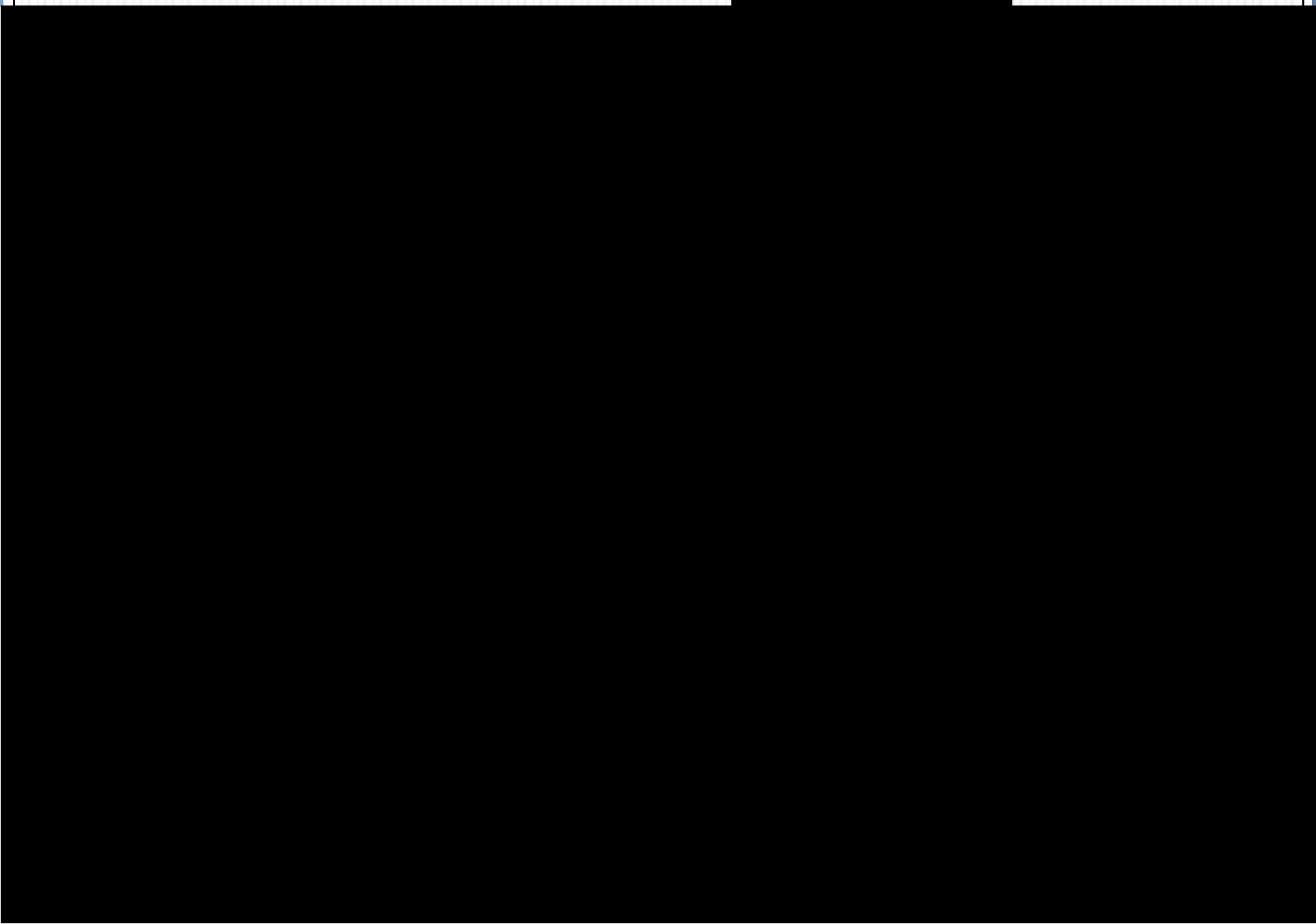


Data Analysis – [REDACTED]



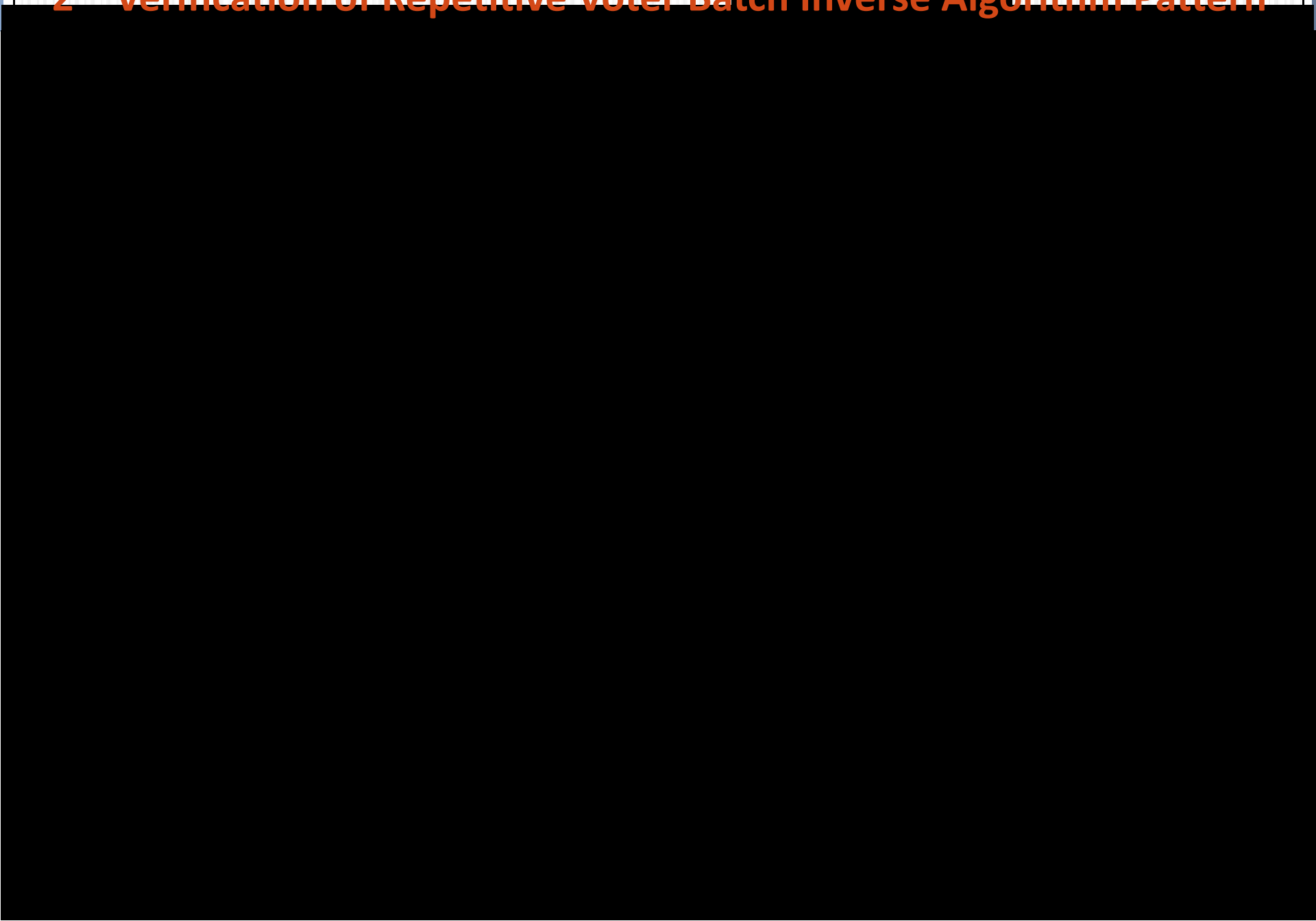
Data Analysis – Search for AssetID 265

Data Analysis – Repetitive Algorithmic Pattern



Demonstration

2nd Verification of Repetitive Voter Batch Inverse Algorithm Pattern



Public Information Requests to Williamson County

From: Robert Bagwell <Rcbag@protonmail.com>
Sent: Wednesday, February 14, 2024 12:41 PM
To: plarequest <plarequest@wilco.org>
Subject: PIA Request

EXTERNAL email: Exercise caution when opening.

Dear Sir / Madam,

I am formally requesting the following:

1. Current Qualified Voter Roll. Please include the district types information along with voter history and voter information. Please provide in excel and/or csv format.
2. All CheckIns Export aka poll book login files for Nov. 23 election. Please provide excel format.
3. All ballot stock (unused ballot cards) documentation for Nov. 23 election.
4. Current storage inventory list for unused ballot cards.

Sincerely,

Robert Bagwell

From: plarequest <plarequest@wilco.org>

Date: On Thursday, February 29th, 2024 at 4:36 PM

Subject: RE: PIA Request (2024-236-PIA)

To: Robert Bagwell <Rcbag@protonmail.com>

CC: Allyssa Delgadillo <allyssa.delgadillo@wilco.org>, Amber Wodraska <amber.wodraska@wilco.org>, Anane Flores <anane.flores@wilco.org>, Corby Holcomb <corby.holcomb@wilco.org>, Kerstin Siptak <kerstin.siptak@wilco.org>, plarequest <plarequest@wilco.org>, Reva Trainor-Collis <reva.trainor-collis@wilco.org>

Good afternoon Mr. Bagwell,

Please see the attached PDF file in regards to your Public Information Act request received on February 14, 2024.

Public Information Requests to Williamson County

From: laura.pressley.truetexaselections@startmail.com <laura.pressley.truetexaselections@startmail.com>
 Sent: Thursday, February 29, 2024 1:14 PM
 To: plarequest <plarequest@wilco.org>
 Cc: plarequest <plarequest@wilco.org>; Ariane Flores <ariane.flores@wilco.org>; Reva Trainor-Collis <reva.trainor-collis@wilco.org>; Kerstin Siptak <kerstin.siptak@wilco.org>; Allyssa Delgadillo <allyssa.delgadillo@wilco.org>; Corby Holcomb <corby.holcomb@wilco.org>
 Subject: Re: PIA Spoiled and ESD#9 - Williamson County (2024-156-PIA)

EXTERNAL email: Exercise caution when opening.

Dear Ms. Wodraska,

Thank you. Yes, I have no objection to redacting names that may be being done, will you be sending documents responsive to this request that redact the names on ballots and thus need not be redacted? Copying it to the following email addresses:
 A. For all standard Nov. 2023 ballots (standard size ballots),
 - Copies all spoiled ballots - front and back of spoiled mail in ballot boxes, spoiled early voting in person ballots, and spoiled election day in person

From: plarequest <plarequest@wilco.org>

Thursday 14 March 2024 at 14:14:44

RE: PIA Spoiled and ESD#9 - Williamson County (2024-156-PIA) Disclosure of Responsive Information

To: laura.pressley.truetexaselections@startmail.com

Cc: Allyssa Delgadillo Amber Wodraska Ariane Flores Corby Holcomb Kerstin Siptak
 plarequest Reva Trainor-Collis

Good morning Ms. Pressley,

Pursuant to your agreement with our office, we have redacted the names of the individuals on the ballots without the necessity of seeking a ruling from the Attorney General. Please be advised that the responsive information for your request exceeded 20mb in size. Please find below a link where you can access and download the responsive information: [2024-156-PIA](#)

Please note that the following information has also been redacted from the responsive information without the necessity of seeking a ruling from the Attorney General:

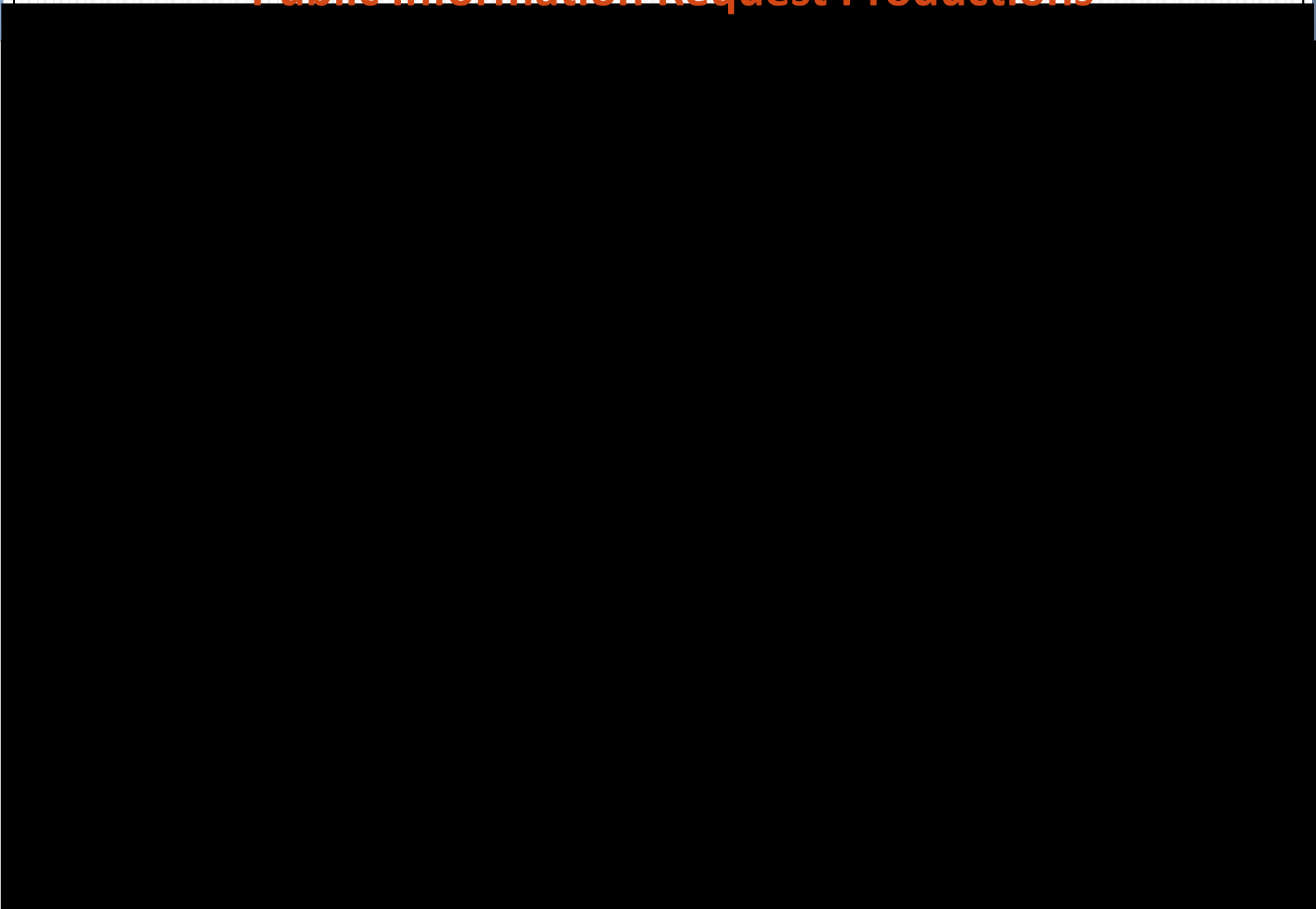
- Pursuant to Texas Government Code Section 552.130, all motor vehicle record information (a.g., license plate numbers, VIN, driver's license information) has been redacted.
- Pursuant to Tex. Att'y Gen. OR2016-28413, all dates of birth have been redacted.

*The information you requested contains information that relates to:

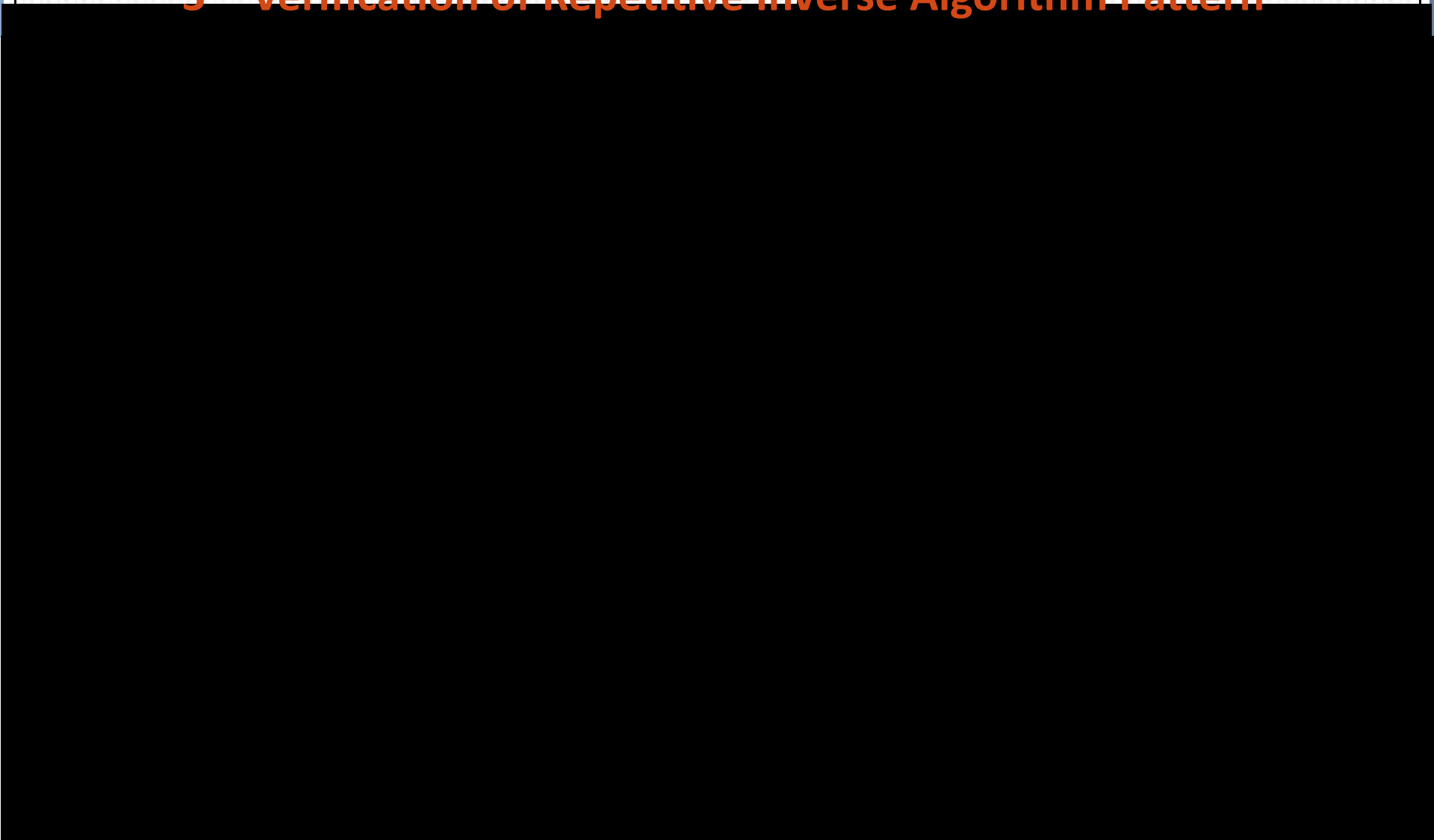
- a motor vehicle operator's or driver's license or permit issued by an agency of this state or another state or country; or
- a motor vehicle title or registration issued by an agency of this state or another state or country; or
- a personal identification document issued by an agency of this state or another state or country or a local agency authorized to issue an identification document

Public Information Request Productions

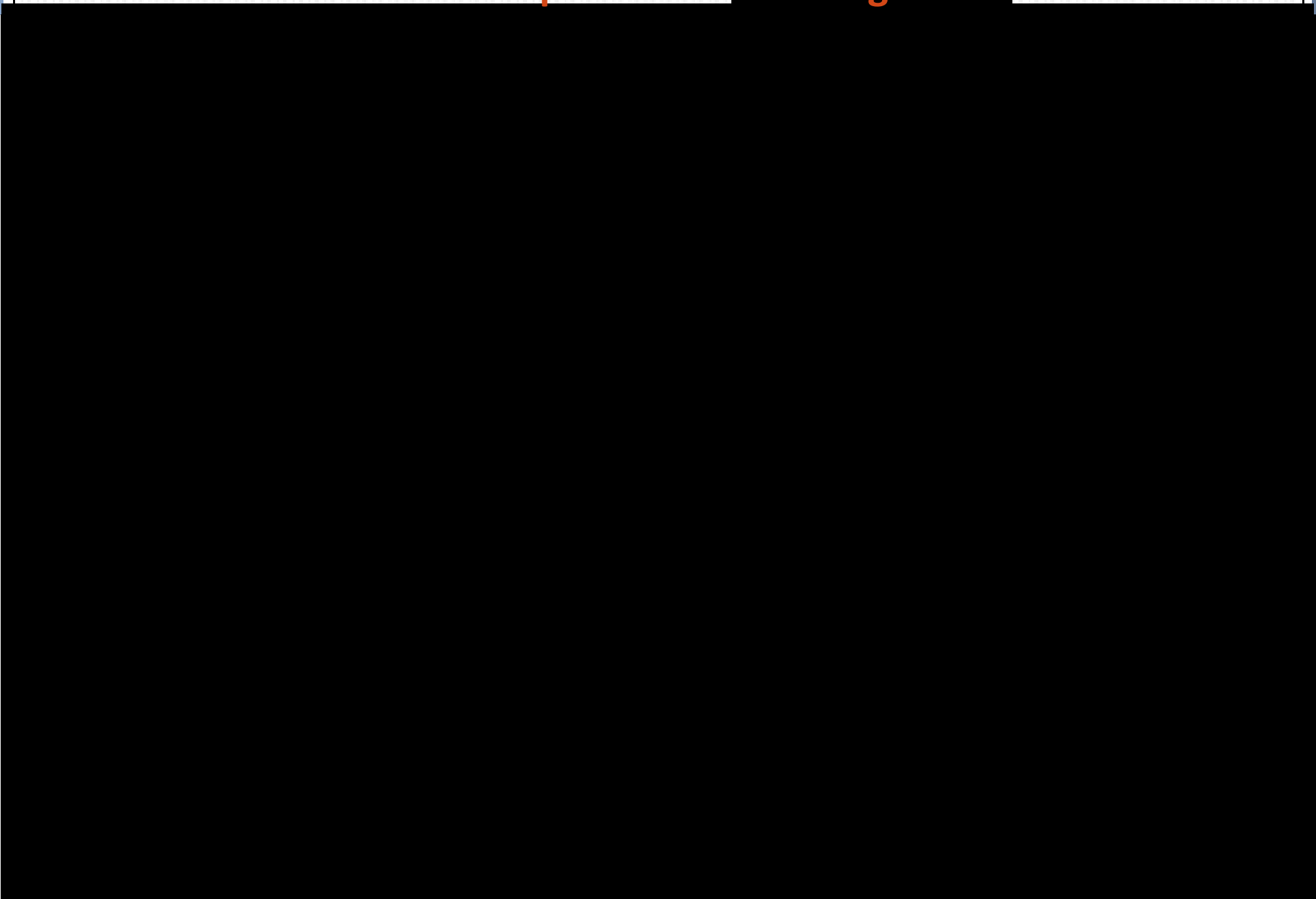
Public Information Request Productions



3Rd Verification of Repetitive Inverse Algorithm Pattern



3Rd Verification of Repetitive Inverse Algorithm Pattern



Additional Verifications

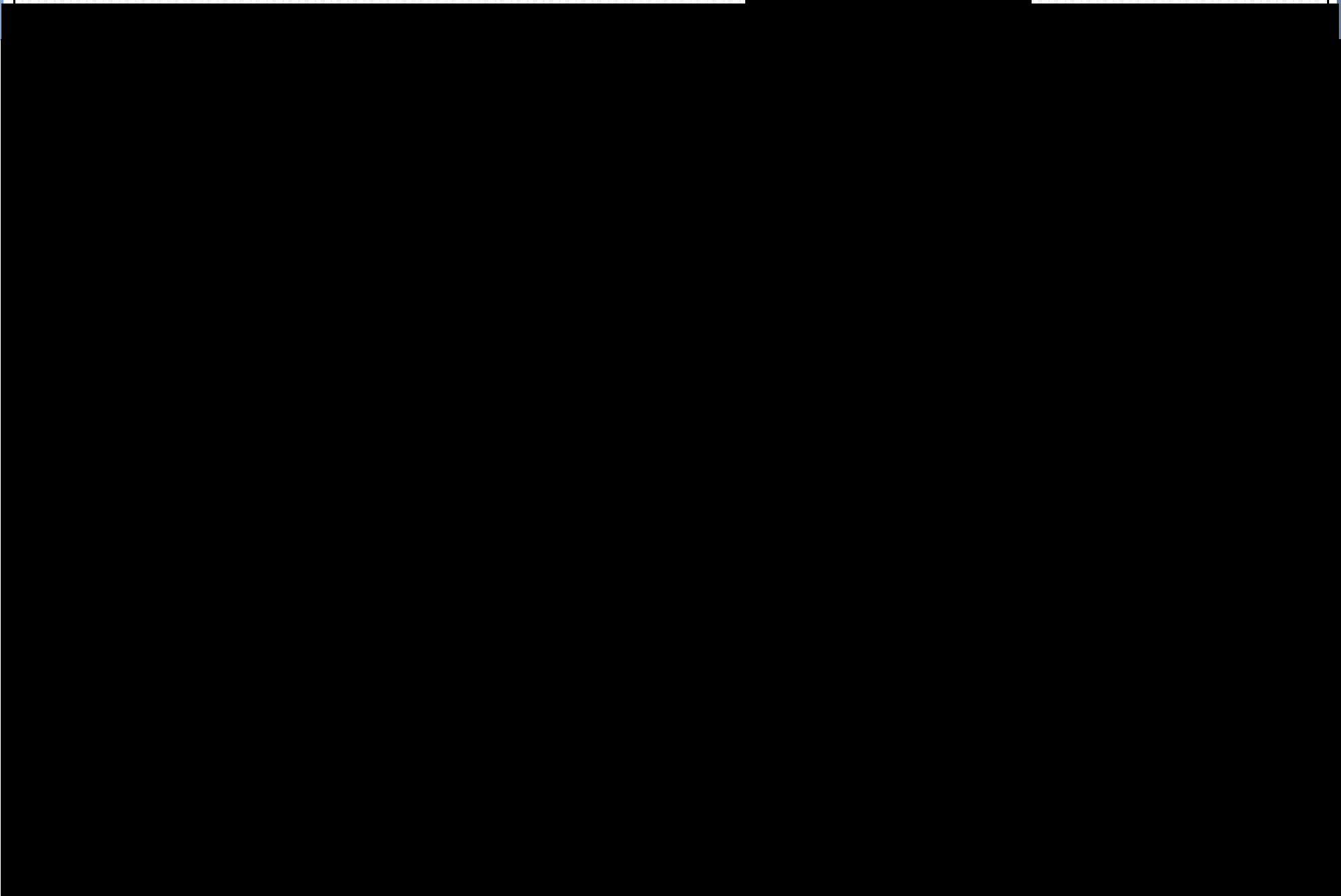
Plaintiffs' Ballots

- Robert Bagwell
- Teresa Soll

Williamson County Elected Officials' Ballots

- County Attorney – Doyle Hobbs, Jr.
- County District Attorney – Shawn Dick
- Sheriff – Michael Gleason
- County Judge – William Gravell
- District Judge – Scott Field
- District Judge – Betsy Lambeth
- Commissioner Pct 1 – Terry Cook
- Commissioner Pct 2 – Cynthia Long
- Commissioner Pct 3 – Valerie Covey

Plaintiff



Plaintiff

Teresa Soll's Ballot

Plaintiff

Teresa Soll's Ballot

Williamson County Attorney Doyle "Dee" Hobbs, Jr.'s Ballot

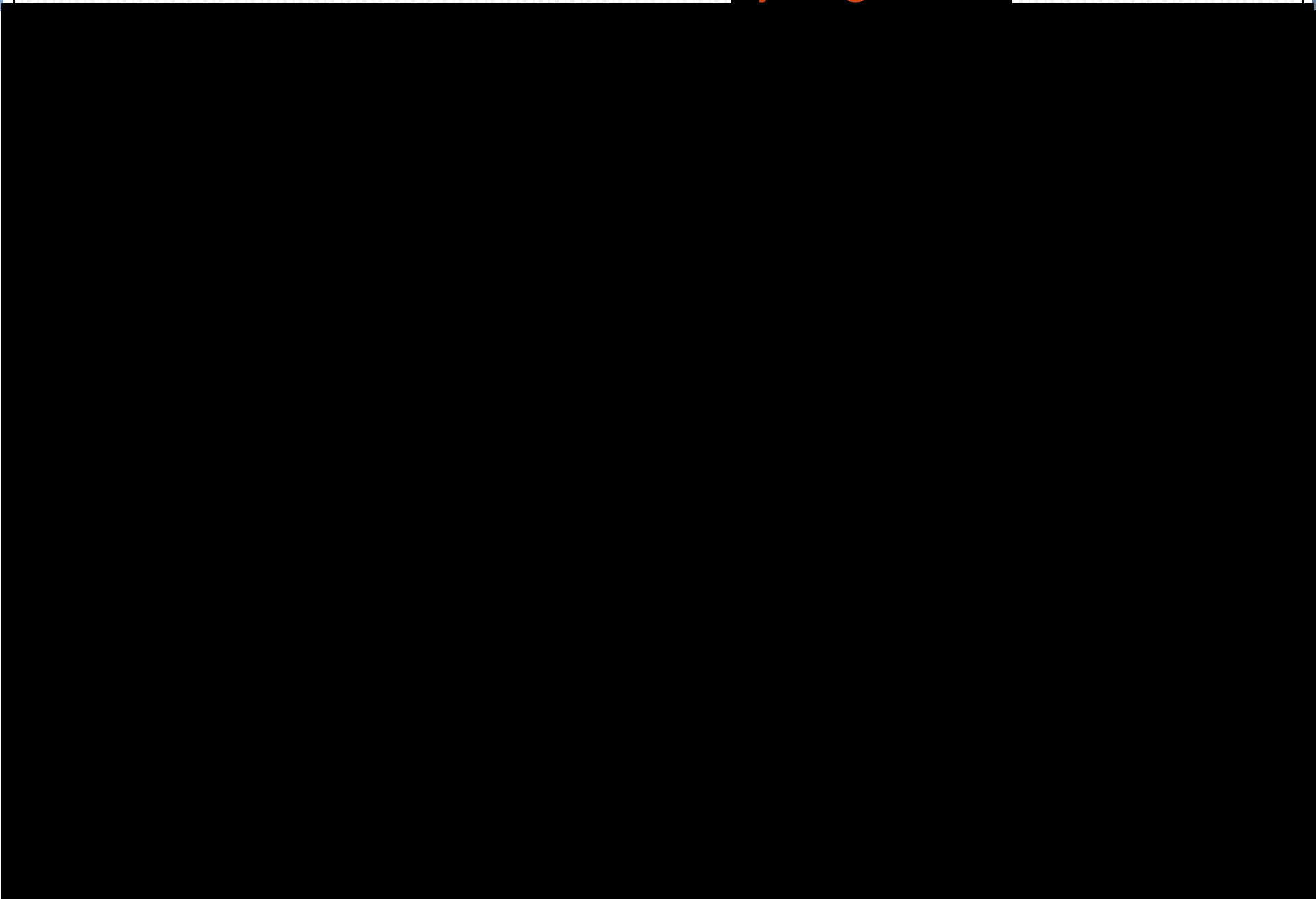
Williamson County District Attorney

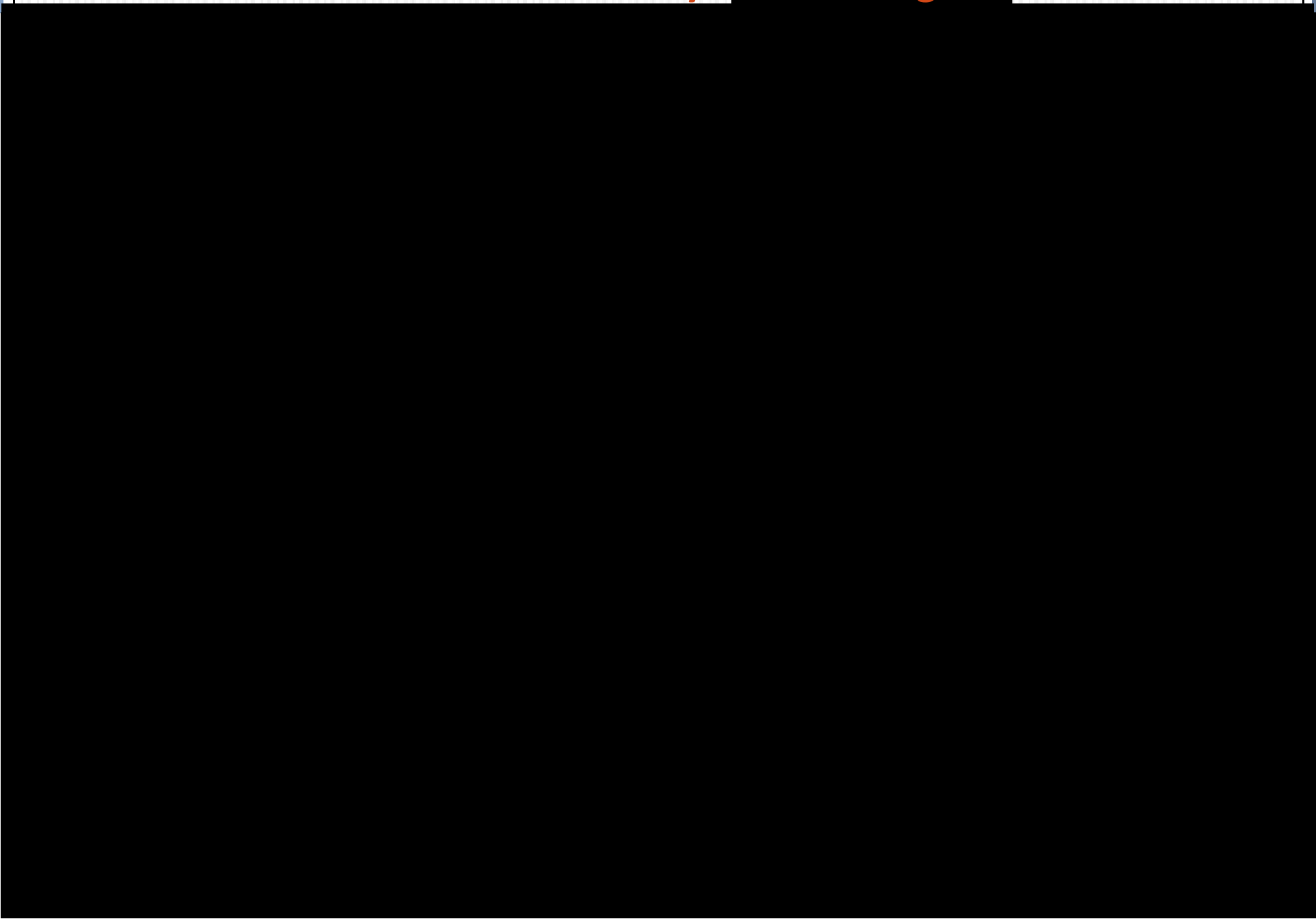
Shawn Dick's Ballot

Williamson County Sheriff

Micheal Gleason's Ballot

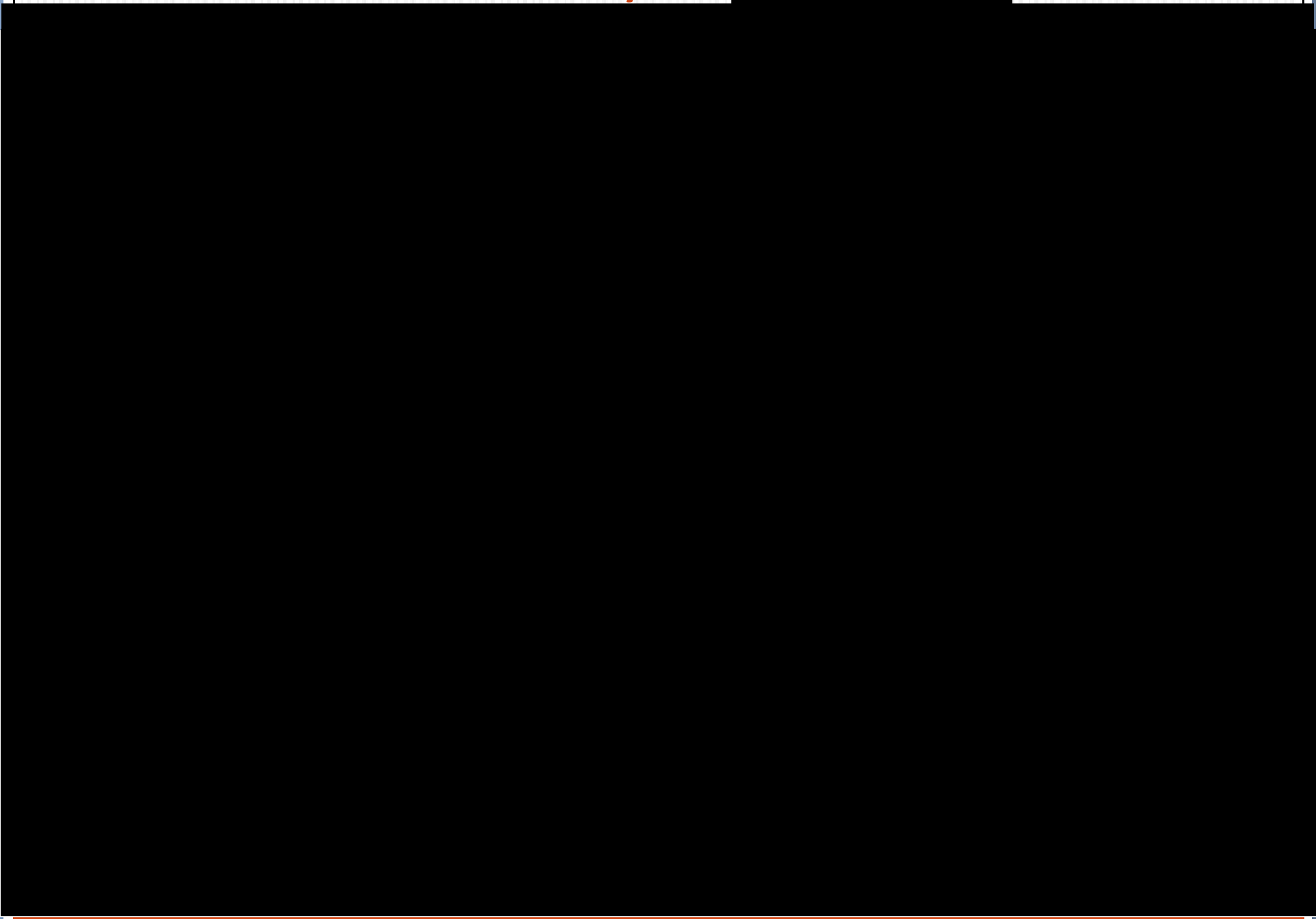
Williamson County Judge



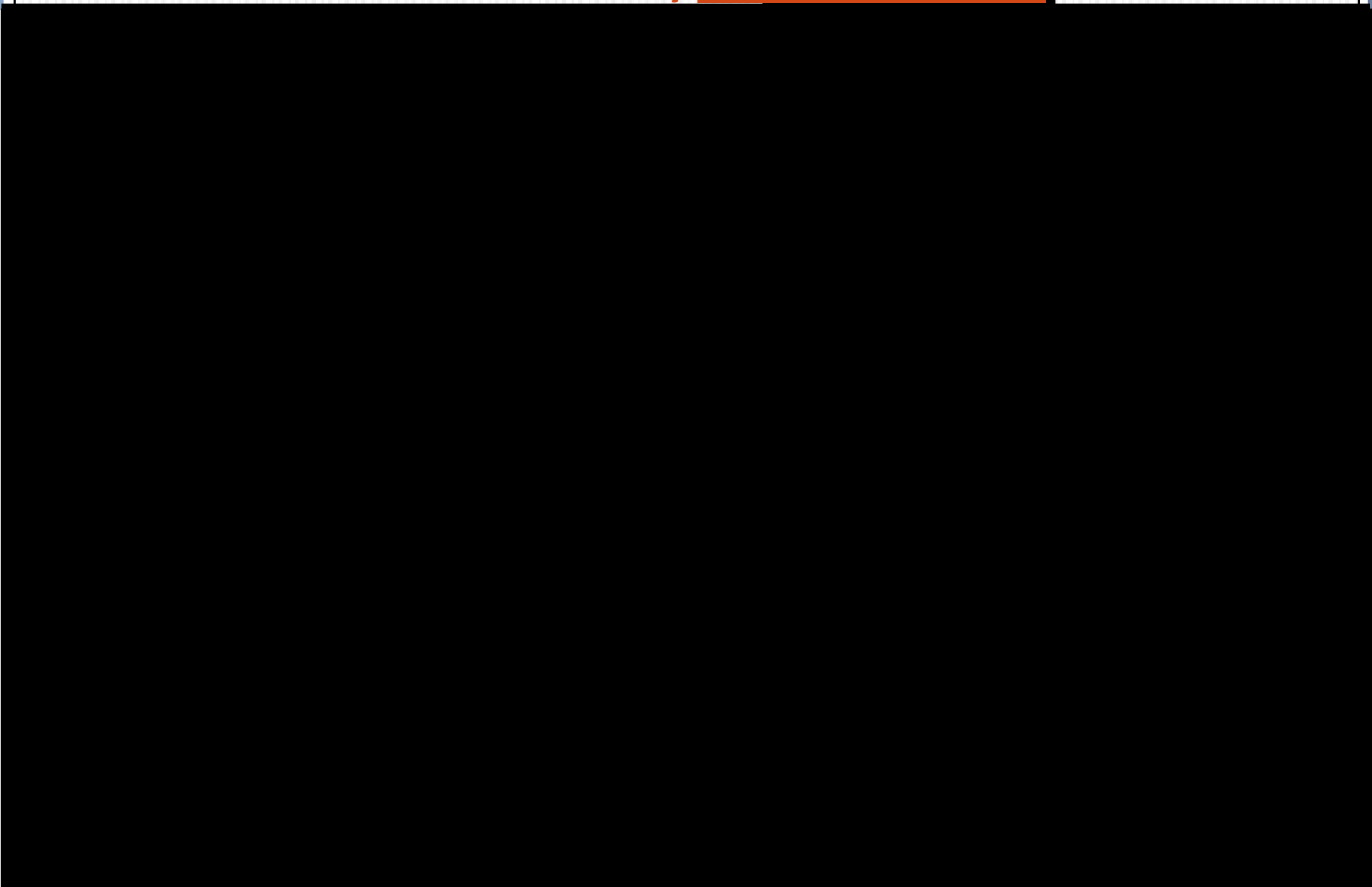


Williamson County District Judge

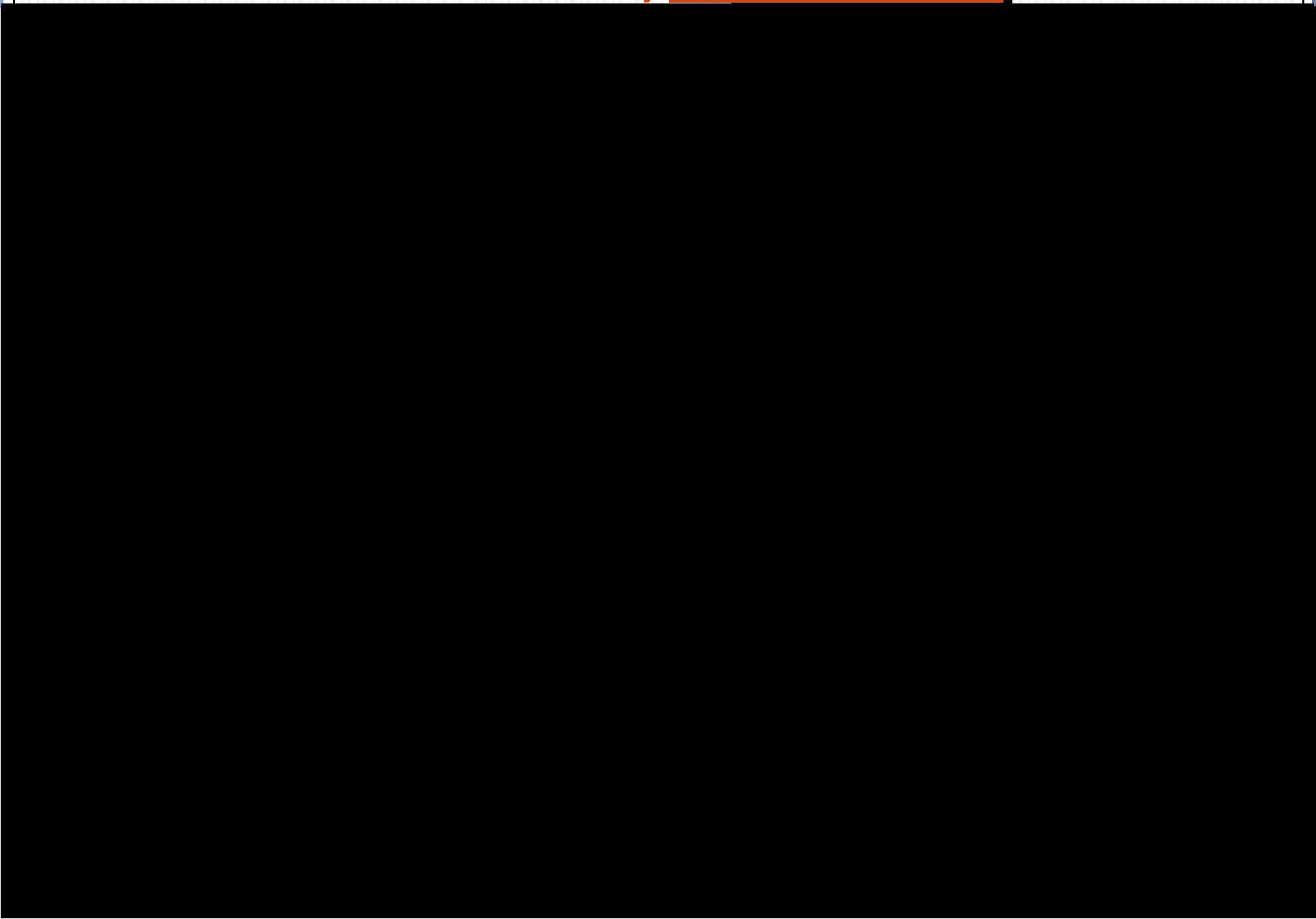
Betsy Lambeth's Ballot



Williamson County May 2022 Election



Williamson County May 2023 Election



Williamson County - Tenex Pollbook and ES&S ExpressLink

“Ballot Number Tracking Through Voting System Software”¹

Reveals How In-Person Voters In Williamson County Vote

