

Specific and Identified Fraud and Failures in Florida's Elections

The People, Processes and Systems
that Undermine Your Vote

Lake County Election Integrity and Voter Protection Coalition (LCEIVP) is a grassroots organization of Florida citizens concerned with election systems and processes. Regardless of party affiliation, we believe every legal vote should count as one vote, for one person, in every election.

I. INTRODUCTION

LCEIVP conducted a review of publicly available data, processes, legal requirements, and canvassing items related to voter registration in the State of Florida and Lake County, Florida, to verify the integrity of the current voter rolls, identify whether fraud occurred during the 2020 election, and ensure statutes are followed in future elections. Based upon this review, we have identified statistically significant numbers of false and fraudulent voter registrations and illegal votes cast in the 2020 election.

In addition, individuals have been registered to vote in Florida without their consent or knowledge. These illegal registrations are facilitated by bad actors through the lack of an effective verification process to determine if individuals are eligible to vote in Florida elections. Once this primary and foundational step in the voting system has been compromised, every step that follows is likely to be manipulated for fraudulent purposes.

We have also concluded that the Florida Secretary of State (SOS) and the Lake County Supervisor of Elections (SOE) failed to maintain the voter rolls as required by law to such an extent that the rolls have been rendered unreliable. Voters remain on the active voter rolls when they should have been removed, voter registrations are not reviewed for legitimacy or eligibility, and voters have voted more than once during a single election. Our investigation also revealed that in the 2020 General Election, inaccurate rolls and malfeasance by election officials resulted in a statistically significant number of illegal registrations and illegal votes statewide.

Despite not having access to specialized, confidential, or internal databases that are used by elections officials, law enforcement agencies or government entities, LCEIVP volunteers have identified serious and systemic problems in our voter registration and election processes. Below, we identify and describe three categories of systemic election integrity issues: vote violations, registration violations, and voter roll maintenance violations in Lake County, Florida, and include a brief review of similar violations statewide. Vote violations include double voting and non-resident voting. Registration violations include illegal nursing home registrations, identity theft of out-of-state Florida residents, illegal addresses and residences, and non-Florida residents registered to vote in Florida elections. Roll maintenance violations include deceased voters remaining on rolls long after death, and VBM ballots sent to voters and addresses that are not eligible, accurate or verified.

II. VOTE VIOLATIONS

A. Double Votes – One Person, Two Votes

Florida Statute Section 104.18 prohibits any individual from casting more than one ballot at any election and anyone who willfully does so commits a third-degree felony. LCEVIP reviewed the statewide voter rolls and identified five hundred twenty-four (524) Voter Identification Numbers that are associated with more than one successful vote in the 2020 general election. [524 VIDs Voting Twice.xlsx](#)



Twenty-two (22) VIDs were presented to Lake County SOE Alan Hays in a FOIA request. Nine (9) Lake County voters were confirmed in the State Legislative Report (the official election data submitted by elections officials to the Florida legislature) as having voted twice in the 2020 General Election. An additional thirteen (13) identified voters in Lake County attempted to vote twice in Lake County or in other counties, but were given a provisional ballot for one of their voting attempts. SOE Hays publicly stated in a newspaper editorial and on LakeVotes.com, that there were no double voters in Lake County. Until the LCEIVP volunteers met with SOE Hays, these successful double voters were not identified or investigated by SOE Hays. SOE Hays was urged by LCEIVP members to investigate at least one of the identified double voters in the presence of the LCEIVP members. SOE Hays then reviewed one voter's record, conferred with Duval County SOE office and together they verified the voter had voted in both Lake and Duval Counties, and the LCEIVP research was correct.

In addition to the voters who attempted to vote twice using the same VID, we also identified voters with different VIDs, but same name, same address, and same birth date who successfully voted twice. This includes voters who voted twice in the same county, and voters who voted twice in more than one county. The following link identifies all categories of Double Voters.

[Double Voters.xlsx](#)

B. Non-Florida Residents Voting in Florida Elections

Florida Statute 97.041(1)(a) states that a person may become a registered voter only if that person: 1) Is at least 18 years of age; 2) Is a citizen of the United States; 3) Is a legal resident of the State of Florida; 4) Is a legal resident of the county in which that person seeks to be registered; and 5) Registers pursuant to the Florida Election Code.

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The number of Lake County double voters in the 2020 General Election, per a newspaper editorial and LakeVotes.com message from SOE Alan Hays

22

The number of Lake County VIDs that the LCEIVP found to have voted twice or tried to do so in its review of statewide voter rolls

In violation of State law, voters who are not Florida residents are voting in Florida elections. LCEIVP volunteers took a selection of voter records that had addresses with unusual volume of voters or non-matching last names. We



Florida Statute 97.041(1)(a)

A person may become a registered voter only if that person:

- 1) Is at least 18 years of age;
- 2) Is a citizen of the United States;
- 3) Is a legal resident of the State of Florida;
- 4) Is a legal resident of the county in which that person seeks to be registered; and
- 5) Registers pursuant to the Florida Election Code.

searched the Lake County Property Appraiser's Office website to further review the voters registered at these addresses. We identified 2020 Voters who owned property, sold property, and moved to other states, years prior to the 2020 General Election. To be certain of our findings, we located ex-Floridians in other states and verified residential status for them in their new state. In some cases, we could even verify their new voter registration in their new state. An extensive report and corresponding property deeds and documentation are included in the supplemental

attachments to this report. (The supporting deeds will be made available upon request, to avoid an extensive amount of attachments in this document.)

[\(Identifying Illegal Votes\)](#)

[\(PCNT 1 to 10 REPORT.xlsx\)](#) [\(PCNT 11 to 30 REPORT.xlsx\)](#)
[\(PCNT 31 to 99 REPORT.xlsx\)](#)

III. UNLAWFUL REGISTRATIONS

Voter Registration is the foundation of our elections process. If our elections officials fail to perform the statutorily required due diligence at this stage, the elections process is made weak and vulnerable. The Florida Voter Registration Application can be completed on a paper form, at government agencies and online. There are different requirements for each option: the paper form can be completed by third-party registration organizations, who aren't required to verify the applicant's personal information, but may take the application form to the SOE's office for processing. Registrations turned in by third parties are tracked by a unique identifying number for accountability.

Online registrations can be completed online, and for applicants who are over 65, or who are permanently or temporarily disabled, there is an exemption to the identity requirement. This specific group will not have to appear in person to

prove their identity before being registered. If this group successfully registers, they can then request a VBM ballot, vote, and never be seen by any elections official.

Government agencies, such as libraries, public assistance offices and the Department of Highway Safety and Motor Vehicles (DHSMV) are also authorized to register voters.

In order to register to vote by any of these methods, a Voter Registration Application must be completed. An applicant must sign the form as an oath, swearing they are qualified as an elector in the state of Florida (F.S. 97.051), and swears or affirms that the information contained in the registration application is true under penalty for false swearing under F.S. 104.011.

Following are examples of Unlawful Registrations:

A. Vulnerable Voters - Nursing Homes and Assisted Living Facilities

We met with administrators of Lake County Nursing Homes and Long-Term Care facilities and showed them a list of people who used the facility address as their residential address on their active and current voter registrations. Facility administrators confirmed some voters who were registered from their facilities did not reside at the facility or never resided at the facility. In violation of State law (F.S. 104.011(1)), the individuals who created falsified voter registrations in the names and dates of birth of elderly and vulnerable voters falsely swore this oath in connection with voting and elections. In addition, these unknown persons created falsified voter registrations using vulnerable voters' names and personal identification information and were registered to vote in Florida without their knowledge or consent. Completing a registration in another person's name would require an altered and forged registration application, a falsified oath on the application, and criminal use of personal identification (104.012(4); 831.01; 817.568).

Although some of these elderly individuals did not vote in the 2020 General Election, their voter registrations were falsified when registrations were created with an address where they did not reside, and these falsified voter registrations were submitted to the Supervisor of Elections office as true and accurate, in violation of State law (104.011(2)). Each falsified registration is theft of the identity and potential vote of a vulnerable person and would be subject to enhanced penalties.

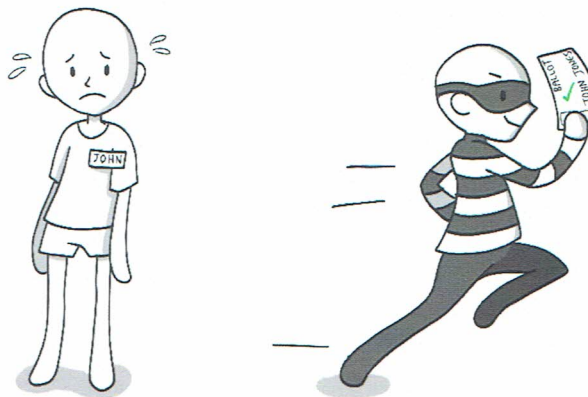
Because of the Health Insurance Portability and Accountability Act (HIPAA) restrictions, we did not ask to verify residency details. This information would be

available through the Agency for Health Care Administration and other sources if requested by the appropriate authorities.

The SOE will have voter records and voter transaction history (a record of all changes in a voter's record at the SOE) to assist in evaluating these cases. ([List of Unknown Nursing Home Registrations and Voters](#))

B. Identity Theft of Out of State Individuals

In violation of State laws, individuals who were not Florida citizens were registered to vote in Florida without their knowledge or consent. Completing a registration in another person's name would require an altered and forged registration application, a falsified oath on the application, and criminal use of personal identification (104.012(4); 831.01; 817.568). These elderly



individuals did not vote in the 2020 General Election; however, their voter registrations were falsified when registrations were created with an address where they did not reside, and these falsified voter registrations were submitted to the Supervisor of Elections office as true and accurate, in violation of State law (104.011(2)).

Example 1: ██████████ appeared in the Lake County voter rolls with a residential address at the ██████████, and a mailing address in Ohio. A letter was mailed from LCEIVP volunteers to the Ohio address. ██████████ called our volunteer and said she and her husband, ██████████ visited Florida seasonally for 20 years and stayed in ██████████ in Leesburg. They did get a Florida ID card but not a Florida Driver's License. While in Florida, they maintained their Ohio residency and voted only in Ohio. Both were registered in Florida in 2019 without their knowledge or consent. ██████████ died July 19, 2021. No votes were recorded in Florida for the ██████████. (██████████ [ID Theft.xlsx](#)) Both are shown as INA (inactive) on the Lake County rolls as of February 14, 2022.

Example 2: ██████████ and ██████████ had a Leesburg address as their residential address on their voter residence and a Minnesota mailing address on ██████████. Lake County voter rolls indicated the

██████████ were registered as voters on October 6, 2017. A letter was mailed by LCEIVP volunteers to ██████████ at the Leesburg address and to ██████████ at the Minnesota address, to ask them to verify their voter record. ██████████'s letter came back as Undeliverable from the Leesburg address. ██████████ called from Minnesota when he received his letter. He said he and ██████████ lived in Florida from October 2017 to March 2018 and then went back to Minnesota. The ██████████ bought ██████████ ██████████, Leesburg, FL, 34748 on September 28, 2017, with the deed recorded October 4, 2017. Their voter registration date is October 6, 2017. Neither he nor ██████████ chose to register to vote in Florida, but both show a Florida registration date of October 6, 2017, without their knowledge or consent. They sold the house March 1, 2018, and moved back to ██████████, Minnesota. ██████████ died in Minnesota in ██████████. No votes were recorded in Florida for the ██████████. (██████████ [ID Theft.xlsx](#)) Both are shown as INA (inactive) on the Lake County rolls as of February 14, 2022.

To PROVE: Need to request individual's records from SOE to include signature, where the Voter Registration application was initiated (online, government agency, third-party registration). Third-party registration organizations have a unique number assigned to each registration they turn in to the SOE.

C. Illegal Addresses and Voter Residency

In violation of State law (98.015(12)), the Secretary of State and the Supervisors of Elections around Florida fail to exercise due diligence to properly evaluate a voter's address for legality or validity by failing to maintain and use a list of valid addresses, including apartment and dormitory room numbers, as required. In response to a citizen's request for clarification about validation procedures, the Lake County responded with an irrelevant Attorney General opinion. ([SOE Reply to ██████████.pdf](#)).

[AG Opinion 63-31 not supportive of SOE response.pdf](#)

The Voter Residency Guidelines for Florida found on the Florida Department of State/Division of Elections website says, "Legal Residency is not defined in law." ([FL SOS Voter Residency Updated 06-2019 Final.pdf](#)) However, over the years, the courts and the Florida Department of State/Division of Elections have

construed legal residency to be where a person has a fixed abode with the present intention of making it their permanent residence.

For voter registration purposes, F.S 97.021(3) states “Address of legal residence” means the legal residential address of the elector and includes all information necessary to differentiate one residence from another, including, but not limited to, a distinguishing apartment, suite, lot, room, or dormitory room number or other identifier. The official Florida Voter Registration Application has a required field for Residence indicating “Address Where You Live – Legal Residence – No PO Box.” ([Florida Voter registration.pdf](#))

District Court of Appeal of Florida, Fifth District, states in Kinney v. Putnam County Canvassing Board, “A person is not permitted to vote in any elections precinct or district other than the one in which the person has his or her legal residence and in which the person is registered.”

The Florida Department of State, Division of Elections Director, Maria Matthews provided Division of Elections Advisory Opinion 18-09 (DE 18.09), regarding voter residency ([DE 18-09 Voter Residency.pdf](#)) ... “it is unlikely that a customer of the Mail Forwarding Service, Recreational Vehicles and Boats, because of their mobile nature cannot be fairly characterized as a “place where a person has a fixed abode””. Additionally, the Division opines that Florida Driver License, or identification card are insufficient to establish

CITIZEN QUESTION:
WHAT INTERNAL GUIDELINES
OR PROCEDURES DOES THE
SOE USE TO DETERMINE THE
VALIDITY OF AN ADDRESS?

SOE RESPONSE:
*IN FLORIDA, THE ADDRESS
SUBMITTED BY THE PERSON IS
CONSIDERED THEIR ADDRESS
OF RECORD. ATTORNEY
GENERAL OPINION 063.31
ESSENTIALLY SAYS THE
ADDRESS IS WHATEVER THE
PERSON SAYS IT IS.*

Source: September 13, 2021,
email reply to citizen [REDACTED]



THE SOE’S RESPONSE
WAS IRRELEVANT.
AG 063.31 REFERS TO A
HOUSE BUILT ON THE BORDER
OF TWO PRECINCTS OR
MUNICIPALITIES AND
DETERMINING THE PRECINCT IN
WHICH THE ELECTOR VOTES.

residency without a valid Florida legal residence for the purposes of voter registration.

In violation of State law, case precedent and Department of State, Division of Elections Advisory opinion, Florida voter rolls contain mailboxes, campgrounds, marinas, and storage facilities being used as a “Residence Addresses” in voter registrations.



BY NATURE,
A MAIL SERVICE BOX IS NEITHER A
PERMANENT NOR TEMPORARY RESIDENCE,
AS PEOPLE CANNOT LIVE IN THE BOX.
MOST CONCERNING, REGISTRANTS ATTEMPTED
TO CONCEAL THAT THESE ADDRESSES WERE NOT
LEGAL RESIDENCES BY USING WORDS LIKE
“APARTMENT,” “UNIT” OR “SUITE.”

In violation of State law and
Division of Elections policy, Lake
County voter rolls have thousands of
mail service addresses, RV
campgrounds and business addresses
used as Voter Residence Addresses
(97.041(1)(a)4). Specifically, mail
service facilities, such as UPS Stores,
have been used to appear to be
physical addresses by using the

physical store address, and disguising the mail service box as “suite” number.

Additionally, when these non-Residence Addresses are used in conjunction with an out of state address, it is reasonable to believe that the voter does not have residence in Florida and is ineligible to vote in Florida. Just as problematic, when a non-Residence Address, such as a storage facility address, is used by a voter who has no mailing address other than a storage facility, it is reasonable to believe this is an attempt at deception and the voter is not a qualified voter.

This response from the Lake County Supervisor of Elections office indicates they are aware of the requirements of voter registration information but are not enforcing such requirements.

Citizen Question: Is a registration without unit/lot/apartment numbers valid when the ‘official’ address contains them?

SOE Response: *Florida Statute 97.053(5)(a)2 states: (5)(a) A voter registration application is complete if it contains the following information necessary to establish the applicant’s eligibility pursuant to s. 97.041, including:*

- 1. The applicant’s name.*
- 2. The applicant’s address of legal residence, including a distinguishing apartment, suite, lot, room, or dormitory*

room number or other identifier, if appropriate. Failure to include a distinguishing apartment, suite, lot, room, or dormitory room or other identifier on a voter registration application does not impact a voter's eligibility to register to vote or cast a ballot, and such an omission may not serve as the basis for a challenge to a voter's eligibility or reason to not count a ballot. (SOE Reply to [REDACTED].pdf)

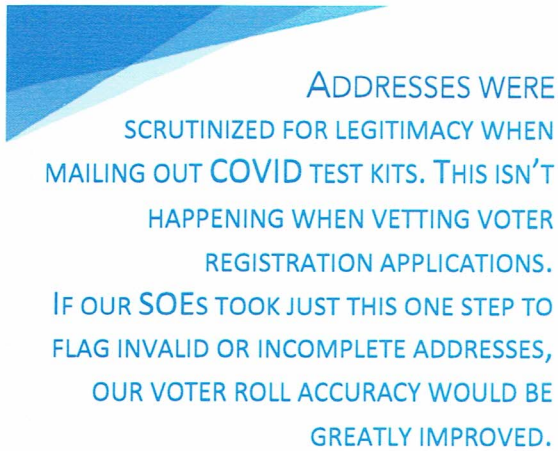
Per Florida Statute 97.021(3): “**Address of legal residence**” means the legal residential address of the elector and includes **all information necessary to differentiate one residence from another, including, but not limited to, a distinguishing apartment, suite, lot, room, or dormitory room number or other identifier.**

D. Lack of Statutorily Required Due Diligence

In order to become a registered voter in Florida, a person must, among other things, be a "legal resident" of a Florida county (97.041(1)(a)4). The SOE in each county determines whether applicants or registered voters are or remain legal residents of the county. Per Florida Statute 98.015(3), each county SOE is responsible for updating voter registration information, entering new voter registrations into the Statewide voter registration system, and acting as the official custodian of documents received by the Supervisor related to the registration of electors and changes in voter registration status of electors of the Supervisor's County. Within these responsibilities, the SOE has a duty to the citizens of Florida to be diligent in vetting legal Florida voters.

In violation of State law (F.S. 97.015(12)), the Secretary of State and the Lake County Supervisor of Elections office have not been verifying voter registration addresses for registered voters against the list of valid Residential Street addresses as required. If a voter registration application does not include information necessary to differentiate one residence from another, the supervisor shall make all reasonable efforts to obtain such information to maintain the list of valid residential street addresses. The supervisor shall make all reasonable efforts to coordinate with county 911 service providers, property appraisers, the United States Postal Service, or other agencies as necessary to ensure the continued accuracy of such list. The supervisor shall provide the list of valid residential addresses to the statewide voter registration system in the manner and frequency specified by rule of the department.

Even government-funded COVID tests requested through USPS have been denied delivery for apartment dwellers who do not include their apartment

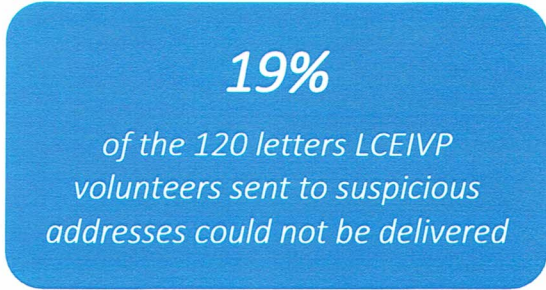


ADDRESSES WERE
SCRUTINIZED FOR LEGITIMACY WHEN
MAILING OUT COVID TEST KITS. THIS ISN'T
HAPPENING WHEN VETTING VOTER
REGISTRATION APPLICATIONS.
IF OUR SOEs TOOK JUST THIS ONE STEP TO
FLAG INVALID OR INCOMPLETE ADDRESSES,
OUR VOTER ROLL ACCURACY WOULD BE
GREATLY IMPROVED.

numbers, or where the address provided was a commercial address – this was for alleged life safety concerns with an urgency implied. [USPS.com](https://www.usps.com) states, “tests cannot be ordered for business addresses...,” and includes the statement, “the address you entered is listed as a business address in our system...” Error messages regarding address validity on the USPS site include, “**We couldn’t validate your address as complete. Did you include**

your apartment or suite address?”

LCEIVP volunteers sent out one hundred twenty (120) letters to suspicious addresses to test their legitimacy. Twenty-three (23) letters were returned to the Post Office as “Return to Sender,” “Undeliverable As Addressed,” “VACANT,” “Attempted - Not Known,” and more, thus verifying lack of residency and illegitimacy of these addresses. If “reasonable efforts” were made by the SOE, these inaccuracies would not plague our voter rolls.



19%
*of the 120 letters LCEIVP
volunteers sent to suspicious
addresses could not be delivered*

Dereliction of duty by the SOEs, who did not adhere to state statutes that first require the establishment of legal Florida and County residency (97.041(1)(a)4), and then did not make reasonable efforts to vet voter registration addresses as valid, illegal, and prohibited addresses remain on the voter rolls in the following categories:

E. Ballots are Illegally Forwarded – Facilitated by SOEs and Mail Services

Data analysis was conducted on mailing addresses shared by large numbers of voter registrations across the state of Florida. It is important to remember that mailing addresses are the locations used to mail a Vote By Mail (VBM) ballot. Pursuant to F.S. 101.6103, Ballots shall be addressed to each elector at the address appearing in the registration records and placed in an envelope which is prominently marked “Do Not Forward.” Ballots are mailed to the mailing address on file in the voters’ records. If voters use an illegitimate mailing address on their voter registrations, they will not receive their ballots. If they do not receive their ballots, and the ballots are not forwardable, there should be no votes recorded for them. Any person who marks or designates a choice on the ballot of another person is guilty of a third-degree felony. A voter who does not live at the residence on record and is not using a legitimate mailing address is an illegitimate voter. It is a third-degree felony to perpetrate or attempt to perpetrate fraud by allowing your address to be used in connection with voting or the attempt to vote, per F.S. 104.041.



Below is a snapshot of data from the Statewide Mailing Address analysis:

MailAddressHash	TotalReg	TotalVote	Turn Out	Description
[REDACTED]	3729	2534	68.0%	RV Park [REDACTED]
[REDACTED]	2685	2337	87.0%	[REDACTED]
[REDACTED]	1229	747	60.8%	[REDACTED]
[REDACTED]	671	366	54.5%	[REDACTED]
[REDACTED]	482	423	87.8%	[REDACTED]
[REDACTED]	260	208	80.0%	[REDACTED]
[REDACTED]	192	178	92.7%	The UPS Store, [REDACTED]
[REDACTED]	149	114	76.5%	[REDACTED]
[REDACTED]	142	67	47.2%	https://www.mailboxrentalsflorida.com/
[REDACTED]	134	105	78.4%	The UPS Store, [REDACTED]
[REDACTED]	134	103	76.9%	The UPS Store, [REDACTED]
[REDACTED]				Mailing Address: Private House claiming to be [REDACTED].com;
[REDACTED]	126	51	40.5%	Residential Address: County SOE Office

For example, Columbia County Property Appraiser’s data indicates [REDACTED] Lake City, Florida, 32055, is owned by [REDACTED], and is a single-family home of 1,876 square feet. [REDACTED] is affiliated with [REDACTED] which offers mail forwarding, domicile and vehicle registration services. The site states, “Learn how you can use our

Address Service with Mail Forwarding to establish and maintain a domicile or residence in Florida.”

One hundred thirty-six (136) voters are registered using the mailing address [REDACTED] Lake City, Florida, 32055.

Of these, there are one hundred twenty-four (124) voters using the residential address of 971 W. Duval St, Lake City, Florida, 32055, although this is the Columbia County Supervisor of Elections.

(In the General 2020 election: 46 voted by mail; 4 voted early; 80 did not vote.)

[REDACTED]

[REDACTED]

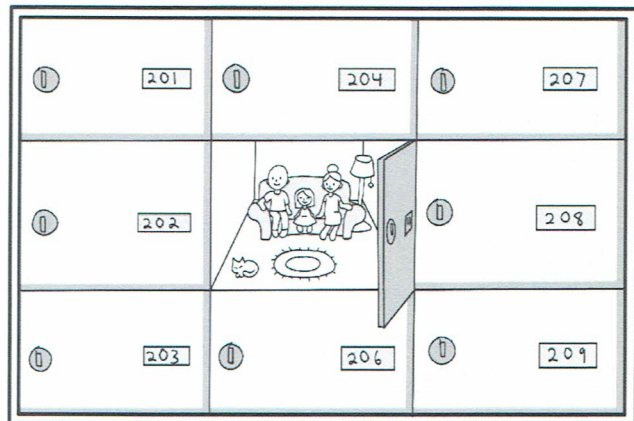
F. Mailbox as Residential Addresses

In violation of State law (97.041(1)(a)4) and in direct conflict with Florida Division of Elections Advisory Opinion 18.09, Voter Registrations and Votes are coming from PO Boxes and Mail Forwarding services being used as Residence addresses. Neither Florida law nor the Division of Elections recognize mailboxes as dwellings.

This occurred and continues to occur in Lake County and across the state. State of Florida voter rolls have more than 800 mail service addresses being used as residence addresses ([FL_YPmailbox_rental.xlsx](#)).

The following example of voters registered using mail services is in Clay County, Florida:

- 4,363 Registered Voters are getting mail at a mail forwarding business at [REDACTED]



“A LEGAL RESIDENCE
MAY EVEN, FOR EXAMPLE, BE
A PARK BENCH, BUT CANNOT BE
A COMMERCIAL MAILBOX.
A RESIDENCE PLAINLY IS NOT
A PLACE WHERE PEOPLE DO NOT HAVE
A PHYSICAL PRESENCE TO RESIDE.”

Source: Florida Division of Elections Advisory
Opinion 18.09



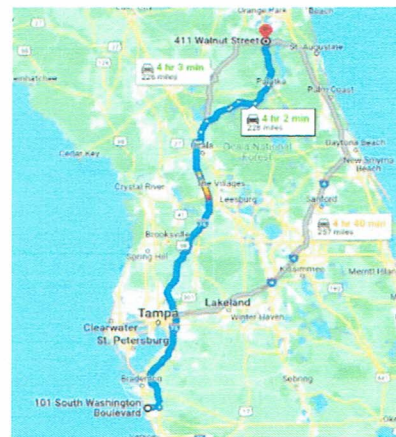
73%
of registered voters getting mail at a mail-forwarding business at [REDACTED] voted by mail in the 2020 General Election

- o 3,662 Voted in 2020
- o 3,100 Registered using a Marina [REDACTED], as their Residential Address
- o Mix of Party Affiliations: 1693 Republicans; 1294 Democrats; 1250 No Party Affiliation

Data analysis of statewide voter rolls starting in early 2018, found that many registrations were moved from using the 1 Clay County, Green Cove Springs, FL as their residential address, to using the marina at [REDACTED], FL.

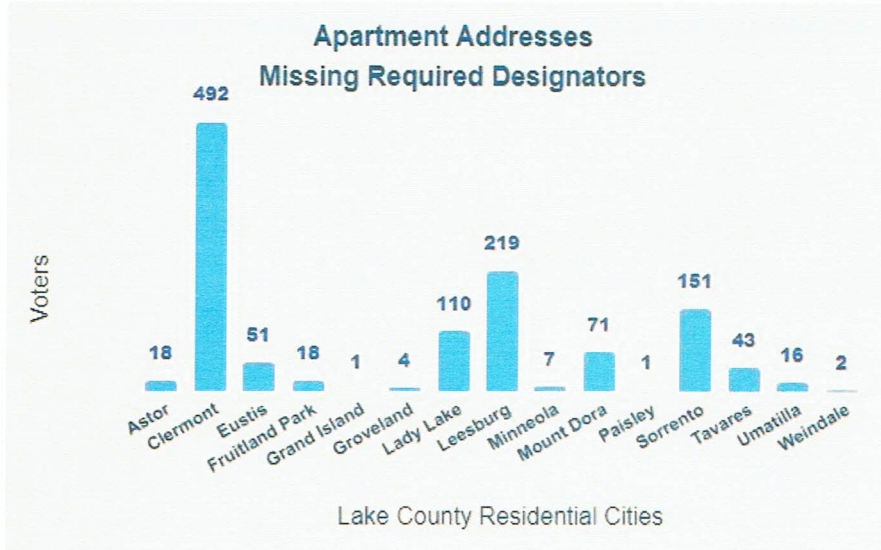
The timing on this move is noteworthy in that it occurred around the time of the June 2018 Division of Elections Legal Advisory (DE 18.09) specifically at the request of the Clay County Supervisor of Elections and specifically about using 1 Clay County as a residential address. The opinion is as follows: “the Division opines that, given the facts you have provided, it is unlikely that a customer of the Mail Forwarding Service is a legal resident of Clay County. First, neither the Declaration of Domicile nor the driver license alone prove legal residence in Clay County. You state that in the Declaration of Domicile, customers declare that they reside at 1 Clay County. However, 1 Clay County is not an address of legal residence. You indicate that, instead, 1 Clay County is a fictitious address used to designate your office in Clay County. The plain meaning of "residence" entails dwelling or living at a place. Because the Mail Forwarding Service's customers do not in any sense live in your office, the Declaration of Domicile does not establish that the customer has a legal residence in Clay County.

In addition to those with a residential address of [REDACTED], voters in fifty (50) of Florida’s sixty (67) counties use the [REDACTED] mailing service in Clay County. The map shows the drive one voter would have to pick up his mail at the [REDACTED] address.



G. Apartments Without Designators

In violation of State law (97.041(1)(a)4) and in direct conflict with Florida Division of Elections Advisory Opinion 18.09, voter registrations and votes are



coming from apartments that do not include the required elements to determine legal State or County residency. This failure to adhere to statutes results in thousands of addresses without statutorily required designators.

Without these designators, there is no way to differentiate one residence from another, and ballots may end up in the wrong hands. This disenfranchises voters who should have been assisted by the SOE’s office. The following chart depicts apartments without apartment designators for the 2020 election. Spreadsheets are linked identifying these incomplete apartment addresses, and identified apartment address errors. [Apartments Voters with no Apt Number.xlsx](#) [Apartments Secondary Unit Designator Address Errors.xlsx](#)

H. Campgrounds

In violation of State law (97.041(1)(a)4) and in direct conflict with Florida Division of Elections Advisory Opinion 18.09, voter registrations and votes are coming from RV parks and campgrounds. There are 2,259 individuals registered to vote in Lake County who are using campground addresses as permanent residences for voter registration purposes.

Example 1: [REDACTED], Leesburg, FL 34748 – The State and County data from the 2020 General Election included 399 Voters using [REDACTED] as their residential address. Some of these addresses have no lot indicators, and others deceptively used the terms APT or SUITES. In addition to being prohibited as a residence, [REDACTED] management stated in a telephone conversation on April 14, 2022, that the RV park is for residents 55

years and over. November 3, 2020, there were 46 registrants using [REDACTED] for their residence address who are under 55 years of age.

[REDACTED] has some sites that are temporary “camping” sites. They do not have any age restrictions, but are not permanent residences by definition. There are temporary “camping” spots that do not qualify an individual as a “permanent resident” of [REDACTED]. In total, there are 312 registered voters at the [REDACTED]

[REDACTED] 55+ community and camping sites. These voters cast 167 votes cast in the 2020 General Election, and 81 (49%) voted by mail (VBM).

167
votes were cast in the 2020 General Election from the 312 illegally registered voters listing [REDACTED] as a permanent residence.

Example 2:

[REDACTED]

[REDACTED] states, “Recreational vs. Residence. For our seasonal or annual campers, we need to remember that your campsite is a recreational site and not a residence. Customers shall use their RV and site for recreational purposes only and **shall not use their RV and site as a permanent residence**. Length of stay requirements are based on legal requirements and property established guidelines.”

There are 110 registered voters using [REDACTED] campground as a “Residence Address”. There were 91 votes cast by these voters in the 2020 General Election, and 16 (18%) voted by mail (VBM). All registered voters at this location are illegally registered and any votes from these registrations are illegal.
[Lake County Campgrounds and RV Parks Summary sheet.xlsx](#)

91
votes were cast in the 2020 General Election from the 110 illegally registered voters listing [REDACTED] as a permanent residence.

I. State Parks and Camps as Residential Addresses

Also, in violation State law (97.041(1)(a)4) and in direct conflict with Florida Division of Elections Advisory Opinion 18.09, are voters registered using Florida’s State Parks, fish camps and day camps as residential addresses for voter registration purposes. Permanent residence is further defined in F.S. 196.012(17) as “that place where a person has a true, fixed and permanent home...” and the state parks, fish camps and day camps do not meet that requirement. There are twenty-seven (27) individuals registered using these locations as their residences, with five (5) voting early and six (6) voting at the polls. [STATE PARKS and camps - 14 day limit.xlsx](#)

J. Storage Facilities as Residential Addresses

In violation of State law (97.041(1)(a)4) and in direct conflict with Florida Division of Elections Advisory Opinion 18.09, Voter Registrations and Votes are coming from storage unit addresses which were used as residential addresses for the purposes of voter registration. Some of these registrants using a storage unit as a residence had out-of-state Mailing Addresses. Some had no other address except for the storage unit addresses and all are Active on voter rolls. (*These need to be canvassed to ensure there is no residence located at storage unit)

We contacted [REDACTED] and were told that neither of the two individuals registered with [REDACTED] as their residence lived there. [REDACTED] website indicates they have a variety of sizes of storage units, but does not indicate whether any apartments are on the premises.

Example of Storage Facility used as Residence in Voter Rolls ([REDACTED])
[REDACTED]

VoterID	Last_Name	First_Name	Middle_N ame	Residence Address	Zip Code	City	Mailing_Address_1	Mailing_Address_2	Registration Date	Voter Status	2020 General Election(Nov /03/2020)
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	12/14/2012	ACT	N
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	6/28/2017	ACT	N
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	3/27/2018	ACT	N
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	9/23/2019	ACT	Y
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	10/5/2020	ACT	E
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	11/20/2019	ACT	N
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	4/8/1992	ACT	A

K. Hotels as Residential Addresses

In violation of State law (97.041(1)(a)4) and in direct conflict with Florida Division of Elections Advisory Opinion 18.09, Voter Registrations and Votes are coming from nightly-rental hotels which were used as residential addresses for the purposes of voter registration. As an example of one of the hotels used as a residence, an LCEIVP volunteer spoke to management at [REDACTED], and was told there are no long-term rentals, and no customers rent nightly rooms for more than a short visit. There are two active voters registered using this address as their residence.

Voter ID [REDACTED], [REDACTED].
Voter ID [REDACTED], [REDACTED].

L. Government Buildings used as Residential Addresses

In violation of State law (97.041(1)(a)4) and in direct conflict with Florida Division of Elections Advisory Opinion 18.09, voter registrations and votes are coming from government buildings which were used as residential addresses for the purposes of voter registration. As with all violations in this section, a government building does not meet the requirements of residence. As stated in Division of Elections Advisory Opinion, “A legal residence may even, for example, be a park bench, but cannot be a commercial mailbox. A residence plainly is not a place where people do not have a physical presence to reside.”

M. Non-Existent and Non-Conforming Residential Addresses

We know thousands of voter registrations do not contain required apartment unit numbers and thousands more use mailbox services, RV lots, and marina slips as residential addresses. We have identified thousands of voters statewide who present addresses that *do not actually exist and do not conform to standard address formats*. In Monroe County, 1,889 registered voters showed their residence address at “999005 County Courthouse, Key West”. Of those registered, 1,158 voted, 559 (48%) voted by mail. In Tallahassee alone, there were 140 addresses with 10 or more registered voters at each address. [REDACTED]

1,158

votes were cast in the 2020 General Election from the 1,889 illegally registered voters listing 999005 County Courthouse, Key West — a nonexistent address — as a permanent residence.

████████████████████ had 714 total registered voters, with 321 voting and 296 (92%) voted by mail.

[Not Legal Addresses 5.16.22.xlsx](#)
[Voters Same Address Tallahassee .21.22.xlsx](#)

ID	Voters Same Address	
	Total Registered	Total Voted
	714	321
	332	186
	143	79
	172	75
	88	71
	105	70
	153	62
	102	59
	74	57

IV. POOR VOTER ROLL MAINTENANCE

In violation of State law (F.S. 98.075), Lake County voter rolls are not being maintained. Without good rolls and without verifying eligible voters, there is no chance that the resulting vote count can be accurate or trusted by citizens. If the voter roll isn't maintained, the SOE is failing to perform the duties of the job. Supervisor of Elections has a statutory duty to keep voter rolls maintained, including identifying and removing ineligible registrations and voters.

In part, "...a fictitious person, or **has listed a residence that is not his or her legal residence, the supervisor must adhere to the procedures** set forth in subsection (7) prior to the removal of a registered voter's name from the statewide voter registration system." Procedures have NOT been followed as there are thousands of examples of illegal addresses that have remained on the voter rolls.

The SOE is required to remove all registered voters who have not voted in the last two Federal (Presidential) elections and who did not make a written request that their registration records be updated during that time. Grassroots organization Defend Florida conducted a review of Florida voter rolls and identified 14,673 registered voters out of 280,813 as of January 2022, who are on the rolls as Active but should have been removed by statute.

14,673

registered Florida voters should have been removed from the Active rolls by statute, as of January 2022

Source: Defend Florida

For example, in this list of Lake County voters to be removed ([Voters should have been removed DF Cleanup.xlsx](#)), individuals who registered to vote in 1990, yet never voted, remain listed as Active. Others are listed as Active but haven't voted since 2006.

Defend Florida asked for the LCEIVP's help in submitting a Freedom of Information Act request to Lake County SOE Hays. In the January 24, 2022, request, Defend Florida/LCEIVP requested audit log transactions for the above 14,673 voter records. Defend Florida sent follow-up emails requesting response on March 2 and March 18. Hays finally responded on April 20, 2022, stating:

“Pursuant to, and as provided by Chapter 119, FS, there are no documents responsive to your request. Furthermore, information contained within the VR Systems VoterFocus is not subject to disclosure pursuant to the Freedom of Information Act exemptions 3 and 4, the Critical Information Infrastructure Act, and/or the Uniform Trade Secrets Act.” [DF Emails for 14673 VIDs.docx](#)

As of May 2022, LCEIVP's research of the 14,673 voters in question has shown that approximately 100 have been removed from both State and Lake County voter rolls.

A. Voter Roll Maintenance

The Certification of Voter Roll Maintenance and Eligibility forms (DS DE 117-118) are required reports from the SOE to the SOS. Certifications were sent to the SOS from Lake County SOE on four occasions – every six months - from January 2020 through December 2021. For this two-year period, Lake County SOE indicated that ZERO fictitious persons or illegal addresses were identified.

Eligibility Records Maintenance from July 2020 to December 2020, indicated the SOE did a mass mailing to all registered voters in Lake County. Without performing required maintenance, this caused ballots to be delivered to inaccurate voter addresses.

A review of the [DS DE117-118 certifications](#) shows an alarming lack of consistency of maintenance tasks, and the amounts appearing in each category do not show a consistent or logical flow from one six-month reporting period to the next. For example, in a one-year period, they put 2 people on the Inactive list and the second year, they put 15,125 people on it. For the entire year of 2020, they put 1 person on the Inactive list, but removed 8,046 people just after the election in December.

SOE MAINTENANCE ACTIVITIES						INACTIVE STATUS TO INACTIVE REMOVED	
YEAR	MONTH	Address Confirmation Requests Sent	Address Change Notices Sent	Address Confirmation FINAL Notices Sent	Voters Who Responded to FINAL Notices	Voters Placed on INACTIVE STATUS but REMAINS ON ROLLS (Confirmation was returned Undeliverable; or No response 30 days after Final notice)	INACTIVE VOTERS REMOVED (after Inactive Status, did not vote, try to vote or request absentee/VBM)
2020	JAN - JUN	0	0	64	0	1	0
	JUL - DEC	0	0	0	4	1	8046 (*all in Dec 2020)
2021	JAN - JUN	33,549	0	8,147	0	0	0
	JUL - DEC	629	155	18,116	2,271	15,125	0

Certificate of Address Maintenance Activities from January 2020 to June 2020 indicated that National Change of Address data from the US Post Office was checked as a maintenance activity, but ZERO Address Confirmation Requests or Address Change Notices were sent out. For this same time period, only 1 voter was put on Inactive Status and ZERO Inactive voters were removed.

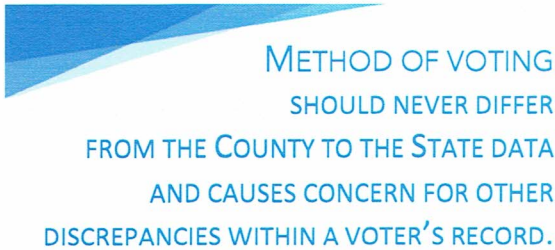
In July 2020 to December 2020, there were ZERO Address Confirmation Requests or Address Change Notices sent out. Again, only 1 voter was put on Inactive Status, but 8,046 voters were removed (all in December 2020).

SOE ELIGIBILITY MAINTENANCE ACTIVITIES				NUMBER OF VOTERS REMOVED FROM VOTER ROLLS				
YEAR	MONTH	Potential Ineligibility Notices Mailed	Voters Who Responded to Mailed Notices	Non-Citizen (Number Removed)	Non-Valid Address (Number Removed)	Listed a Residence That is Not His/Her Residence (Number Removed)	Fictitious Person (Fake Name, Date of Birth, Using Someone Else's Address (Number Removed)	Deceased (Number Removed)
2020	JAN - JUN	56	1	0	54	0	0	1775
	JUL - DEC	15	0	0	0	0	0	2238
2021	JAN - JUN	24	0	0	0	0	0	2170
	JUL - DEC	55	1	0	0	0	0	2637

(Certifications and Certification Chart)

B. Discrepancies between State and County Voting Records

In reviewing State voter rolls, voting methods and voter status, we identified major discrepancies between the State’s data and Lake County’s data. We found specific voters whose County records showed they voted with one method (Early, VBM, Election Day) but the State’s data indicated the vote was cast by a different method. These are records where the County says the person voted Early, and the State says they voted by mail. [Case Vote Variation 5.18.22.xlsx](#)



METHOD OF VOTING
SHOULD NEVER DIFFER
FROM THE COUNTY TO THE STATE DATA
AND CAUSES CONCERN FOR OTHER
DISCREPANCIES WITHIN A VOTER’S RECORD.

LCEIVP volunteers canvassed addresses across Lake County and spoke with many Lake County voters who provided written statements documenting the errors in their records in the voter rolls. Some of the findings were discovered from digital canvassing, comparing the 2020 General Election State Legislative Report and also data bases from July 2021 and November 2021. [Voter Affidavits Pt 1.pdf](#) [Voter Affidavits Pt 2.pdf](#) [Voter Affidavits Pt 3.pdf](#)

C. FLORIDA AUDITOR GENERAL FINDINGS

The Florida Auditor General identified the SOS and the SOE as weak on maintenance of voter rolls and security controls in 2016 and 2020 [2016-002.pdf](#) [Audit of FVRS.pdf](#) and [2021-096 Audit Report of FAVRS.pdf](#)


The Auditor General reports found unresolved issues across the 2016 and 2020 reports. Significantly, State and County processes that were supposed to identify deceased voters and remove them from active voter rolls failed to do so. In fact, deceased voters were left on the voter rolls, and even had votes cast in their names.

From 2021-096: State law and Department rules require the Department and the Supervisors to protect the integrity of the electoral process by ensuring the maintenance of accurate and current voter registration records. Failure to conduct the voter address list and voter registration records maintenance activities constitutes a violation of the State Election Code (F.S. Chapter 97-106).

One of the SOS responses to the Auditor General report was that the Supervisors of Elections have sole authority to make the final determination of action taken on a voter record including changing or correcting voter records or adding or removing registered voters from the rolls.” Whether duplicate or deceased or otherwise illegal registrations, ONLY the SOE can remove voters.

The Auditor General Report stated, “Security controls are intended to protect the confidentiality, integrity, and availability of data and IT resources. Our audit disclosed that certain security controls related to network user authentication need improvement. **We are not disclosing specific details of the issues in this report to avoid the possibility of compromising Department data and related IT resources.**”

With four years between the two audits, State and County officials have not resolved failures in cybersecurity issues, voting systems, roll maintenance or due diligence of the records in their custody. Linked below is an example of deceased registrants in Lake County who are still listed on State and County rolls, with dates of death back to 2007. ([Deceased Registrants Not Removed 4.23.22.xlsx](#))



THE AUDITOR GENERAL
SELECTED ONLY 10 VOTERS'
RECORDS TO REVIEW AND
DISCOVERED THAT A VOTE WAS
CAST IN THE NAME OF ONE
VOTER IN A GENERAL ELECTION
**33 DAYS AFTER THE VOTER'S
RECORDED DATE OF DEATH**
AND IN TWO OTHER
ELECTIONS, **166 AND 222
DAYS AFTER THE VOTER'S
RECORDED DATE OF DEATH.**
VOTING RECORDS FOR
ANOTHER VOTER INDICATED A
VOTE WAS CAST BY MAIL IN A
GENERAL ELECTION **219 DAYS
AFTER THE VOTER'S
RECORDED DATE OF DEATH.**

D. VOTE BY MAIL - LACK OF DUE DILIGENCE

In violation of State law (98.015 (12)), the Lake County SOE said they do not verify residential addresses on new voter registrations, and believe “...*the address is whatever the person says it is.*” The purpose of a residential address on a voter registration form is to prove a voter is a legal Florida resident and is eligible to register to vote (F.S. 98.045). If Florida residency is not proven, then the voter’s eligibility remains in question. If the voter’s eligibility is in question, the legality of their vote is in question. In 2020, a Vote By Mail request form was sent to all County voters without the voter’s initiating request. The Lake County Supervisor of Elections (along with other Florida SOEs) sent Vote by Mail request forms to every person on their unverified Voter Rolls (without verifying residential addresses and voter eligibility prior to the mailing).

Why is this request form important? When residential addresses are not verified as accurate and voters are not verified as living at the address on file, the VBM request form gives anyone in possession of it the opportunity to complete the form, sign it, and send it back to the SOE's office. This form will automatically authorize a Vote by Mail ballot to be sent to that voter at that address. Considering the lack of due diligence to verify accurate and valid addresses, the blanket mailing of VBM/mail-in request forms is highly susceptible to manipulation and fraud by unscrupulous actors.

VBM ballots are **the most error-prone method of voting**. Due to the 2020 'pandemic' every state across the nation expected large increases in VBM ballots and a correspondingly large increase in VBM rejections. The use of VBM ballots

CITIZEN QUESTION:

DID LAKE COUNTY SOE SEND MAIL-IN BALLOT REQUESTS TO EVERY REGISTERED VOTER WITHOUT VOTER INITIATION?

SOE RESPONSE:

WE DID MAIL TO EACH ACTIVE VOTER WHO DID NOT HAVE ON FILE A REQUEST FOR A VBM, A BLANK REQUEST TO ENABLE THEM TO REQUEST FROM US A VBM BALLOT.

Source: September 13, 2021, email reply to citizen [REDACTED].

CITIZEN QUESTION:

AT WHAT SENSITIVITY LEVEL WAS THE SIGNATURE VERIFICATION SYSTEM SET?




THE SOE RESPONDED THAT HE DIDN'T KNOW BECAUSE THE MACHINE VENDOR EMPLOYEE, KEVIN, SET IT.

Source: November 2021 meeting in the office of SOE Alan Hays



THE SOE HAS THE CUSTODIAL AND OVERSIGHT RESPONSIBILITY FOR ALL ELECTIONS OPERATIONS.



THE 2020
GENERAL ELECTION SAW THE
HIGHEST NUMBER OF VBM BALLOTS
CAST IN FLORIDA ELECTION HISTORY YET
THE LOWEST ERROR RATE.

increased from 28.8 million in 2016, to 66.4 million in 2020. The National VBM ballot rejection rate dropped from **0.96** in 2016 to **0.79** in 2020.

When VBM ballots are received in the SOE's office, they are evaluated to determine whether the voter signature on the ballot matches the signature on record.

E. Good Faith Efforts to Effect Change

LCEIVP volunteers attempted to meet with elections officials to learn about their processes. In newspaper editorials, Lake County SOE Alan Hays told any constituents questioning the election process, to “put up or shut up.” We put up. We showed him thousands of incomplete addresses; voters who appeared to vote twice in Florida; out of state voters; and deceased registrant who have been on the rolls for years. We were given no adequate response.

We followed SOE procedures when we requested information, we spent our personal money to obtain records. We used the Freedom of Information Act requests to obtain documentation, some of which we were denied. Other requests were available for \$260!

LCEIVP canvassers spoke with voters at their own houses who verified our findings: unknown people were registered at voters' homes and nursing homes, deceased voters had not been removed from the rolls and voter registration addresses were incomplete, unallowable, or non-existent.

The People's Audit is a database developed by LCEIVP (<https://fl.the-peoples-audit.org/>), using data from the Secretary of State Legislative Report voter rolls and voter history, to allow any individual to check their voter status, their voting history, their method of voting, and, identifies everyone else voting from that address. When someone sees a problem with their record, they can email The People's Audit and LCEIVP. This information, provided directly from individual voters, is tracked in the database by category of problem, including “Unknown Person Voting from My Residence.” ([Unknown Voters at Residence TPA.xlsx](#))

The People's Audit

<https://fl.the-peoples-audit.org>

V. SYSTEM FAILURE

Under State law (104.0515), “No person, acting under color of law shall: in determining whether any individual is qualified under law to vote in any election, apply any standard, practice, or procedure different from the standards, practices, or procedures applied under law to other individuals within the same political subdivision who have been found to be qualified to vote.” If any person has been determined unqualified to register or vote based on a lack of Florida citizenship, or illegal addresses or due to death, then **this standard must be applied to every registrant and voter.**

THE FAILURE
TO CONDUCT
DUE DILIGENCE OPENS A
POTENTIAL VIOLATION OF
VOTING RIGHTS OF EVERY
FLORIDA VOTER.



Our voting process is fraught with vulnerabilities: a transient population, inexperienced poll workers, inconsistent operations in elections centers, outdated software, and machines that are not trusted by experts, politicians, or the public. When these inherent vulnerabilities are combined with instances where elections officials do not follow statutes or policy, we have a complete breakdown of process and law, as well as lack of trust by voters in the election process. There are votes that are counted twice – one in one county and one in another – from the same person. We found substantial numbers of registered voters claiming a “Residence” of state parks, marinas, recreational vehicle campgrounds, storage

TAXPAYERS
PAY FOR PERSONNEL,
EQUIPMENT, INTERNAL
SOFTWARE, BUILDINGS, THIRD
PARTY NATIONAL SOFTWARE AND
THIRD-PARTY VOTING MACHINES.
THE COSTS ARE ENORMOUS, BUT
WORSE THAN THE COST IS THE
LOSS OF VOTER CONFIDENCE
IN OUR VOTING SYSTEM BECAUSE
OF ITS FAILURE TO ENSURE
ACCURATE AND LEGAL VOTES.

facilities, mailbox service retail stores, city/county government buildings and vacant lots. All of these are in contradiction with Florida State Statutes, case precedent and the Department of State, Division of Elections Advisory Opinion.

There are voters in large apartment complexes who omit an apartment number on their registration, yet somehow received a vote by mail ballot. Oversight didn’t catch this. Oversight didn’t identify votes coming from voters who “lived” in a UPS mailbox. Oversight didn’t remove registrants after they died. Oversight didn’t remove registrants that moved

out of state. The system in place failed to identify or correct illegal registrations and illegal votes in Florida.

We have presented a small portion of a very large volume of research. LCEIVP has many more examples and much more data analysis that we will gladly provide to an investigative agency. These illegal acts impact the integrity of every vote and the voting public needs to know the truth. We are committed to bringing it to them in the most effective way possible.

Without adherence to laws, without the proper due diligence, without accurate voter rolls, our entire election system is a house built on sand.