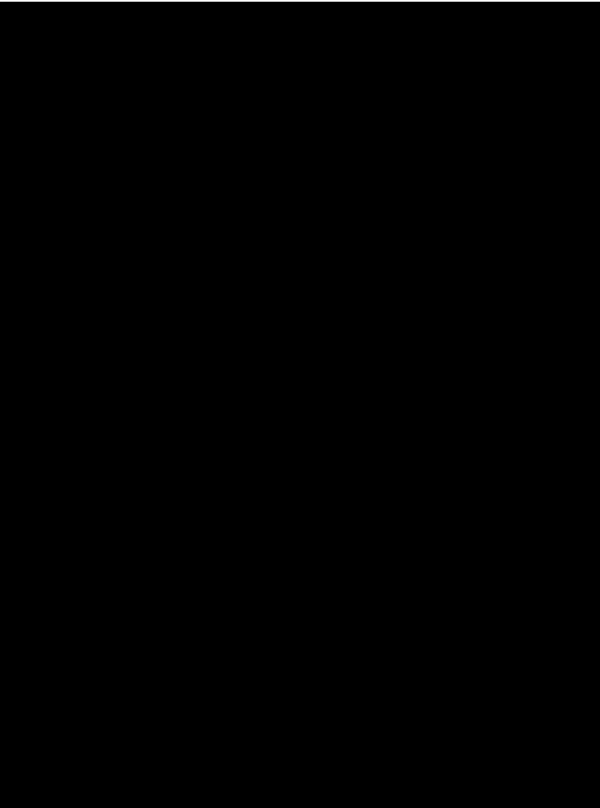


PETITION FOR REEXAMINATION AND IMMEDIATE REVOCATION OF APPROVAL OF THE DOMINION DEMOCRACY SUITE 5.5A (IMAGE CAST X BMD + PRECINCT SCANNERS) PURSUANT TO O.C.G.A. § 21-2-368+

To: The Honorable Brad Raffensperger, Secretary of State
 Elections Division
 2 Martin Luther King Jr. Drive SE, 802 West Tower
 Atlanta, GA 30334

Date: June 2, 2026

Petitioners:

First Name	Middle Name	Last Name	County	Residence Full Address	Voter Registration Number
DAVID	ADRIAN	CROSS	GWINNETT		
SHAWN	HETZER	CROSS	GWINNETT		
DEBORAH	LOUISE	JOHNSTON	FULTON		
BRIAN	KEITH	PRITCHARD	FANNIN		
STEFAN		BARTELSKI	FORSYTH		
CHARLES	THOMAS	TALBOT	HALL		
CYNTHIA	LEE	PANOS	HALL		
RICHARD	JOSEPH	SCHROEDER	HALL		
WILLIAM	PARK	FREEMAN	DEKALB		
LEIGH	ANN HEATON	ESKEW	GWINNETT		
E	SHARLENE	ALEXANDER	FAYETTE		

Petitioners, being ten or more electors of the State of Georgia, hereby petition the Secretary of State pursuant to **O.C.G.A. § 21-2-324(a)** to immediately reexamine the Dominion Democracy Suite 5.5A optical scanning voting system, including the ImageCast X Ballot Marking Devices (electronic ballot markers) and precinct scanners, currently approved for use in Georgia.

Expenses. Pursuant to **O.C.G.A. § 21-2-324(a)**, the examination fee for a petition filed by ten or more electors shall be \$250.00. Petitioners hereby tender the sum of \$250.00 as the required statutory examination fee. Petitioners request that the Secretary of State promptly provide a detailed, itemized written estimate of all anticipated reasonable expenses (if any) (beyond the statutory \$250.00 fee), including the specific tasks, personnel, outside experts (if any), and proposed testing. Petitioners stand ready to pay additional truly reasonable expenses upon receipt of such itemization and justification. Petitioners reserve all rights to challenge, including by appropriate legal action, any demand for expenses that is arbitrary, excessive, or intended to frustrate the statutory right to reexamination.

I. STATUTORY AUTHORITY AND MANDATORY REVOCATION STANDARD

Under O.C.G.A. § 21-2-324(a), the Secretary of State is authorized and required to reexamine any voting machine or voting system previously examined and approved upon the proper petition of ten or more electors of this state. Approval of such systems must comply with the uniform system mandate and safety/accuracy standards of O.C.G.A. § 21-2-300(a), which requires that the equipment used for casting and counting votes “shall be the same in each county” and “safe and practicable for use,” and that electronic ballot markers “shall produce paper ballots which are marked with the elector’s choices in a format readable by the elector.”

Because voting systems have been designated as critical infrastructure by the U.S. Department of Homeland Security, the Secretary of State has a heightened ongoing duty to ensure that any system approved under O.C.G.A. § 21-2-300(a) remains “safe and practicable for use” throughout its deployment.

If the system can no longer meet these standards or presents any problem concerning its ability to accurately record or tabulate votes, approval must be revoked and the system prohibited from further use. Supporting provisions include:

- **O.C.G.A. § 21-2-498** (risk-limiting audits by manual inspection of paper ballots).
- **O.C.G.A. § 21-2-500 and O.C.G.A. § 21-2-52** (preservation of ballot images, logs, and election records).
- **O.C.G.A. § 21-2-379** (arrangements for appropriate ballots when use of optical scanning voting systems is impracticable).
- **O.C.G.A. § 21-2-334 and O.C.G.A. § 21-2-281** (paper ballots as the default when machines cannot be used lawfully or practicably).

II. GROUNDS FOR REVOCATION

The Dominion Democracy Suite 5.5A system **cannot** be safely and accurately used and presents multiple problems concerning its ability to accurately record or tabulate votes.

1. **Unverifiable QR-Code Tabulation** — Scanners tabulate exclusively from the QR code, not the human-readable text or marks. Electors cannot independently verify their votes, and risk-limiting audits under § 21-2-498 cannot reliably confirm voter intent against the paper record readable by the elector (as required by § 21-2-300(a)). The 2024 legislative ban (Senate Bill 189) is a direct admission that the current architecture fails Georgia’s accuracy and verifiability standards. With the July 1, 2026, deadline approaching and no compliant replacement funded or procured, the system is on the verge of statutory illegality.
2. **Demonstrated Vulnerabilities in Deployed Georgia Systems Allowing Undetectable Manipulation** — Independent expert analysis by Clay U. Parikh (M.S. Cyber Security; former VSTL security tester for Wyle Laboratories/NTS/Pro V&V on EAC and state certifications) of actual 2020 Georgia county election databases (Appling, Bibb, Jones, and Telfair — obtained via public records) revealed an egregious security violation: Dominion placed secret encryption keys, x509 certificates, and passwords **in plaintext and unprotected** within the election databases. These keys are used to encrypt/decrypt election data and authenticate file transfers. Their plaintext storage (combined with OS-level Windows log-in authentication only) violates EAC certification requirements, FIPS 140-2 cryptographic key management standards (“Plaintext secret and private keys shall not be accessible from the cryptographic module”), and Georgia’s contract with Dominion. Parikh concluded that “the voters of Georgia should have no confidence that their votes have been accurately counted, if they were even counted at all.”

This finding is independently corroborated by the June 23, 2024, Ballot Assure report “Global Password” by Phillip Davis, which confirms the identical hard-coded password “dvscorp08!” (unchanged for 14+ years) exists in Georgia county election databases and Dominion source code. (See Exhibit H.)

This configuration defect was not addressed in the Dominion Democracy Suite 5.5A certification testing. The official 2019 Georgia State Certification Test Report by Pro V&V (see Exhibit I) was limited in scope, acknowledged a memory lockup issue on the ImageCast Precinct scanner after scanning approximately 4,500 ballots (requiring a poll-worker power cycle), and did not identify or test the plaintext encryption keys and hard-coded passwords later discovered in actual deployed Georgia county databases.

3. **Failure to Preserve Ballot Images and System Logs** — The system relies on digital ballot images for tabulation, yet counties have routinely failed to preserve them or

required logs, violating §§ 21-2-500 and 21-2-52 and preventing meaningful audits under § 21-2-498.

4. **Closed-Source Software and Inherent Procedural Risks** — The proprietary software prevents independent verification. Combined with documented poll-worker errors in calibration, ballot handling, precinct definitions, and chain-of-custody—exacerbated by QR reliance, the system creates undetectable inaccuracies at scale and is impracticable under § 21-2-379.

Purpose of Exhibits

The attached exhibits provide direct evidentiary support for the grounds stated above and demonstrate that the Dominion Democracy Suite 5.5A system cannot be safely and accurately used under O.C.G.A. §§ 21-2-368 and 21-2-300(a). Specifically:

- Exhibit A shows the governing statutory requirements for accurate recording/tabulation, voter-readable paper ballots, audits, record preservation, and fallback to hand-marked paper ballots.
- Exhibit B contains the legislature’s own finding that QR-code tabulation is not reliably verifiable (Senate Bill 189, effective July 1, 2026).
- Exhibit C documents independent expert demonstrations of undetectable manipulation vulnerabilities (Halderman report).
- Exhibit D proves systemic failure to preserve ballot images and logs required for audits and recounts.
- Exhibit E shows county election officials’ official warnings that the system is already impracticable due to the impending July 1, 2026, deadline.
- Exhibit F (Parikh Declaration) proves plaintext encryption keys, x509 certificates, and passwords exist in actual deployed 2020 Georgia county election databases.
- Exhibit G (earlier D-Suite 5.5A Test Plan) shows the certification testing was limited to incremental modifications from the prior version.
- Exhibit H (Ballot Assure Global Password report) independently corroborates the hard-coded “dvscorp08!” password that remains present in Georgia county databases and Dominion source code.
- Exhibit I (2019 Pro V&V Georgia State Certification Test Report) confirms the official state testing was narrow in scope, acknowledged a memory lockup issue on the ImageCast Precinct scanner, and did not detect the plaintext key and password defects later identified in deployed systems.

III. REQUESTED RELIEF

Petitioners request that the Secretary of State:

1. Immediately convene the reexamination under **O.C.G.A. § 21-2-368**, appointing independent software and security engineers (unaffiliated with Dominion or the State) to conduct live, replicable testing of the identified defects, including QR vs. text equivalence, exploit replication (e.g., plaintext key access), memory lockup under load, and any other vulnerabilities in the deployed system.
2. Require Dominion Voting Systems to provide the reexamination team with a complete **Software Bill of Materials (SBOM)** for the currently deployed Dominion Democracy Suite 5.5A system (including all components, libraries, versions, and dependencies) to enable thorough vulnerability assessment.
3. Issue a public report finding that the system cannot be safely and accurately used and does not meet the standards of O.C.G.A. § 21-2-300(a).
4. Revoke approval and prohibit further use of the system.
5. Direct counties to prepare for hand-marked paper ballots under **O.C.G.A. §§ 21-2-379, 21-2-334, and 21-2-281** pending a compliant system.

Given that the State of Georgia currently maintains a budget surplus exceeding \$14 billion and the Secretary of State is responsible for a compliant, functioning system, Petitioners respectfully request that the Secretary of State or Governor exercise his discretion to cover any additional reasonable expenses of the reexamination from state funds rather than imposing further costs on the Petitioners and Georgia taxpayers.

IV. EXHIBITS

The following exhibits are attached and incorporated by reference:

Exhibit A – Statutory Provisions: Full texts or key excerpts of O.C.G.A. §§ 21-2-368, 21-2-300, 21-2-498, 21-2-500, 21-2-52, 21-2-379, 21-2-334, and 21-2-281.

Exhibit B – Senate Bill 189 (2024) (QR-code tabulation ban effective July 1, 2026) and records confirming failure of 2026 delay/funding legislation.

Exhibit C – Independent Vulnerability Expert Reports, including Prof. J. Alex Halderman’s Security Analysis of Georgia’s ImageCast X.

Exhibit D – Open-records summaries and filings documenting non-preservation of ballot images and system logs.

Exhibit E – Statements from county election officials warning of logistical impossibility and chaos due to the July 1, 2026 deadline.


Exhibit F – Declaration of Clay U. Parikh (expert witness; former VSTL tester) analyzing actual 2020 Georgia county election databases (Appling, Bibb, Jones, Telfair) and identifying plaintext encryption keys and passwords.

Exhibit G – Dominion D-Suite 5.5A Test Plan and Test Report (GA DVS5_5A r1.pdf), showing limited incremental testing and Pennsylvania-specific modifications only.

Exhibit H – Ballot Assure Report “Global Password” (June 23, 2024) by Phillip Davis, documenting the hard-coded “dvscorp08!” password in Dominion Democracy Suite systems and Georgia county databases.

Exhibit I – Pro V&V Georgia State Certification Test Report for D-Suite 5.5-A (August 7, 2019) – showing limited testing scope and acknowledged memory lockup issue on ICP scanners.

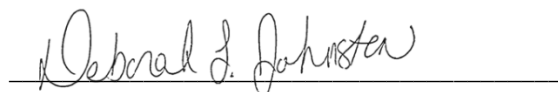
Respectfully submitted,



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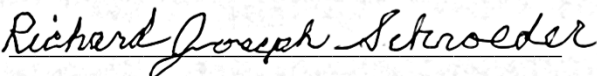
BRIAN KEITH PRITCHARD



DEBORAH LOUISE JOHNSTON



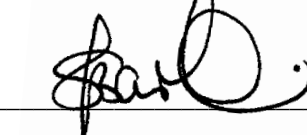
CYNTHIA LEE PANOS



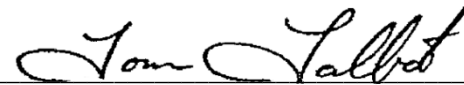
RICHARD JOSEPH SCHROEDER




SHAWN HETZER CROSS



STEFAN BARTELSKI



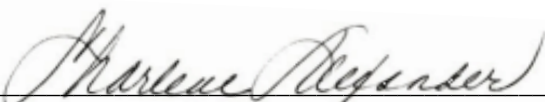
CHARLES THOMAS TALBOT



WILLIAM PARK FREEMAN



LEIGH ANN HEATON ESKEW



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