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**Summary of Petition Filed June 18, 2024 in United States District Court of the  
Middle District of Pennsylvania, Harrisburg, Pennsylvania**

Petitioners' argument is simple: Congress has outlined the minimum standards which must be maintained by every state in order for a federal election to be considered reliable. In Pennsylvania's 2022 federal election, those minimum standards were not met thus producing unreliable results that should not have been certified. Without the Court's action, the 2024 (and subsequent) federal elections will also be unreliable.

Commonwealth officials must conform to certain laws to properly conduct a federal election. The Help America Vote Act (HAVA) is one of those laws and exists in part to "establish minimum election administration standards for States and units of local government ..." 52 U.S.C.A. 21083. HAVA requires that voter roll databases contain only the registrations of qualified citizen voters residing in that state. 52 U.S.C.A. 21083(a). HAVA further defines a voting system as "the total combination of mechanical, electromechanical, or electronic equipment (including software, firmware, and **documentation required to program, control, and support** the equipment) that is used to define ballots; **to cast and count votes**; to report or display election results; and to maintain and produce any audit trail information." 52 U.S.C.A. 21083. Voter registration is thus encompassed in the definition of a voting system defined in HAVA because a voting system includes the documentation required to program the voting machines and to "cast and count votes." 52 U.S.C.A. 21081(b). Petitioners believe the ability to "cast and count votes" begins with establishing eligibility and registering only qualified citizens into voter registration databases, thus assuring that all ballots distributed, cast, and counted, are lawful. As voter registration is included as part of the voting system, it is subject to the allowable or not allowable error rates of voting systems set forth in HAVA.

Analysis of the official Pennsylvania State Voter Registration Data for the 2022 election revealed that, out of 8,755,458 voter registrations, there was a total of **3,192,069** voter registration violations. Out of the votes cast in the 2022 general election, there were a total of **1,198,598** evident voting violations, and **1,089,750** *unique* votes impacted by these apparent voting violations. The total number of Unique Ballots impacted by voting system errors was **1,089,706**.

Under HAVA, an error rate of no more than one in 125,000 ballots is permissible before the results of the *entire election* become suspect, and the integrity and reliability of the election compromised. For the 2022 general election the calculated rate was a maximum of 44 errors permitted or 0.0008%.

The *registration* error rate in Pennsylvania for the 2022 General Election was **thirty-two percent (32%)**. The *vote* error rate in Pennsylvania for the 2022 General Election was **twenty percent (20%)**.

Additionally, the official canvas for the 2022 Pennsylvania Election was 5,410,022 votes (ballots counted) yet there exist only 5,400,869 *voters who actually voted* according to the data provided – a discrepancy of 9,153 votes that are totally unaccounted for and unexplainable.

Petitioners' purpose in setting forth the errors in the 2022 election is to demonstrate the Commonwealth does not have effective control over a voting system that is in conformity with federal and state requirements. The Commonwealth has implemented a system that does not guarantee accuracy or compliance with legal mandates. Petitioners seek redress from these voter registration apparent errors, relief from discrepancies between votes cast and actual votes reported, and relief from voting errors generally, which collectively and historically amount to violations of federal election laws, Pennsylvania election laws, and various voting rights encompassed by the United States Constitution and civil rights statutes.

Petitioners have brought this issue to the attention of Respondents, who have failed to address these errors ensuring future elections will suffer from the same deficiencies. The Respondents' collective actions in refusing to address the problem extinguishes and undermines the very meaning of the right to vote in a fair democracy.

To be clear, Petitioners do not challenge the outcome of the 2022 election. Discussions and/or litigation in Pennsylvania, as well as in other states around the Nation, centered on whether raw vote totals were accurate, with particular attention focused on the question: "if all ballots in dispute were decided, hypothetically, in the favor of one candidate for president in 2020 over the other, would that have changed the *outcome* of the election in that state?"

Petitioners posit a different question: **How many disputed ballots found to be improperly cast in any given federal election may occur before the reliability and integrity of the entire election becomes suspect?** Petitioners respectfully represent that Congress has already answered this very question.

The relief requested by Petitioners in the form of a Writ of *Mandamus* seeks the Court to order Respondents to perform the *ministerial* functions their jobs require by taking actions to rectify issues with the 2022 election and bring the 2024 (and subsequent) federal elections supervised by Pennsylvania authorities, into conformity with the minimum standards for reliability set down by Congress.

Respondents must address issues with compliance to existing election law, specifically: be compelled to adequately investigate the issues, prosecute anyone in violation of federal and/or state law, and actively work to bring the Commonwealth back into compliance with federal and state election law mandates so that Pennsylvania's voters right to vote is upheld.