

**AFFIDAVIT OF ANTOINETTE "TONI" PIPPINS-POOLE**

STATE OF TEXAS §

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COUNTY OF DALLAS §

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BEFORE ME, the undersigned notary public of the State of Texas, on this day personally appeared ANTOINETTE 'TONI' PIPPINS-POOLE, the affiant, a person whose identity is known to me. After I administered an oath to affiant, affiant testified:

"My name is Antoinette 'Toni' Pippins-Poole. I am over the age of 18, have not been convicted of a felony or a crime involving moral turpitude and am otherwise fully competent to make this Affidavit.

"I am the Elections Administrator for Dallas County, Texas ('Dallas County') and am the department head of the Dallas County Elections Department ('Elections Department'). I entered into contracts with the Dallas County Democratic Party and the Dallas County Republican Party to administer the 2020 Democratic primary election in Dallas County and the 2020 Republican primary election in Dallas County ("primary elections") held on March 3, 2020 ('Election Day').

"Initially, Dallas County had 465 countywide polling places ('vote centers') set up for the 2020 primary elections so that any registered voter in Dallas County could cast a ballot at any vote center in Dallas County on Election Day as opposed to being limited to the polling place where the voter was registered to vote. The Dallas County Democratic Party and the Dallas County Republican Party agreed to close 10 vote centers because both political parties did not get contracts with the building locations for those 10 vote centers. Consequently, those 10

building locations for those 10 vote centers refused delivery of the precinct scanner and tabulator machines for those 10 vote centers. In addition, one voter center could not be opened on Election Day for other reasons, so ultimately there were 454 vote centers in operation on Election Day.

"Part of the administration of the primary elections included me serving as the manager of the central counting station ("central count") for both primary elections, which is inside the Elections Department. After the polls close on Election Day, there is a process to reconcile the number of voters accepted to vote at each vote center with the number of ballots received at central count from each vote center.

"During the reconciliation process at central count after the polls closed on Election Day, I determined that there were discrepancies between the number of voters accepted to vote at some vote centers and the number of ballots received at central count from those vote centers.

"Each vote center has electronic poll books where voters present themselves to vote and if they are accepted to vote, are given a ballot to cast in a ballot marking device. The information about each voter who is accepted to vote at each vote center is transmitted electronically to the voter registration system in the Dallas County Elections Department.

"Each vote center has one or more precinct scanner and tabulator machines that scan and tabulate the marked ballots cast by the voters and then store the marked ballots inside the precinct scanner and tabulator machine. 189 vote centers had both a Republican Election Judge and a Democratic Election Judge. 265 vote centers had only a single Election Judge. All 189 vote centers with both a Republican Election Judge and a Democratic Election Judge had two precinct scanner and tabulator machines.

Some vote centers with only one Election Judge had two precinct scanner and tabulator machines. Some vote centers with only one Election Judge had only one precinct scanner and tabulator machine. At vote centers with only one Election Judge and two precinct scanner and tabulator machines, the Election Judge was instructed to 'open' only one of the precinct scanner and tabulator machines.

"There are two thumb drives in each precinct scanner and tabulator that record the votes cast on each ballot fed into the precinct scanner and tabulator machine. One thumb drive is the primary thumb drive and one thumb drive is the backup thumb drive. The primary thumb drive is only ever connected to a precinct scanner and tabulator machine and then later to a desktop computer at central count, which is part of the air-gapped, central count tabulating system. Neither the precinct scanner and tabulating machines or the central count tabulating system are connected to the Dallas County computer network or the Internet.

"In order for each precinct scanner and tabulator machine to scan and tabulate ballots, the Election Judge for each vote center is trained to 'open' each precinct scanner and tabulator machine by using a metal key and password to unlock each precinct scanner and tabulator machine and then use a tabulator touchscreen built into each precinct scanner and tabulator machine to 'open' the precinct scanner and tabulator machine.

"The process of 'opening' the precinct scanner and tabulator machine 'opens' the primary and backup thumb drives in the precinct scanner and tabulator machine so that the thumb drives can record votes.

"As each ballot is scanned by a precinct scanner and tabulator machine, the votes on the ballot are tabulated and then recorded

on the primary thumb drive. No votes are recorded onto the backup thumb drive until the precinct scanner and tabulator is 'closed' after the polls close on Election Day.

"When the polls close on Election Day, the Election Judge for each vote center was instructed to 'close' each precinct scanner and tabulator machine by unlocking a door on the precinct scanner and tabulator machine and pressing a 'close button.' Then the Election Judge is trained to use the tabulator touchscreen that is built into each precinct scanner and tabulator machine to 'close' each precinct scanner and tabulator machine. As each Election Judge 'closes' each precinct scanner and tabulator machine, the votes recorded on the primary thumb drive in the precinct scanner and tabulator machine are automatically copied over to the backup thumb drive in the precinct scanner and tabulator machine.

"After each precinct scanner and tabulator machine in the Election Judge's vote center is 'closed', the Election Judge is trained to remove the primary and backup thumb drives from each precinct scanner and tabulator and place each thumb drive in separate bags to protect the thumb drives from static electricity. Then, the Election Judge is trained to put both bags with the primary and secondary thumb drives into a red envelope for transport to a regional collection site. The Election Judge for each vote center is trained to transport each red envelope from the Election Judge's vote center to one of 13 designated regional sites.

"The precinct scanner and tabulator machines are delivered to the vote centers during the early voting period, but before Election Day. It was determined that there would not be enough Election Judges to have both a Democratic Election Judge and a Republican Election Judge in 454 vote centers. Consequently, it was determined that 189 vote centers would have both a Democratic

Election Judge and a Republican Election Judge, but that 265 vote centers would have either a Democratic Election Judge or a Republican Election Judge, but not both. In the vote centers with only one Election Judge, that Election Judge conducted both primary elections in that Election Judge's vote center.

"As the 13 regional sites receive red envelopes from the Election Judges, Elections Department personnel at the 13 regional sites open the red envelopes and put only the backup thumb drives into a laptop in order to transfer the number of ballots with the votes to central count at the Elections Department for Election night reporting. The primary thumb drives are checked off as they are received at the 13 regional sites and set aside in a container with a physical locking mechanism. At the end of the night, the locked containers with the primary thumb drives and backup thumb drives are hand delivered to central count by the 13 regional site managers.

"As the votes come into central count from the 13 regional sites, the reconciliation process begins to compare the number of voters accepted at each voter center with the number ballots cast at each vote center.

"During the reconciliation process, the number of primary thumb drives sent out to vote centers was compared with the number of primary thumb drives received back at central count. It was initially believed that all of the ballots cast at all of the 454 vote centers had been received back at central count on the primary thumb drives that had come back to central count from the 13 regional sites. However, it was later determined that there are ballots from 44 of the precinct scanner and tabulator machines that are unaccounted for.

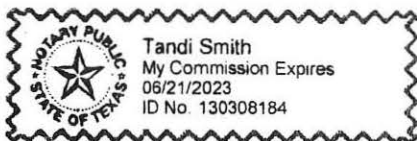
Consequently, I need to perform a paper recount of the ballots from 44 of the precinct scanner and tabulator machines that were not accounted for during the reconciliation process.


"Each and every statement contained in this Affidavit is true and correct and based on my personal knowledge or on public records available to me as Elections Administrator for Dallas County, Texas.

FURTHER AFFIANT SAYETH NAUGHT."

  
Antoinette "Toni" Pippins-Poole

Sworn to and subscribed before me on March 6<sup>th</sup>, 2020 to certify which witness my hand and seal of office.



  
Notary Public for the State of Texas