



Paul Johnson

Criminal District Attorney

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June 14, 2021

CERTIFIED MAIL: 7018 0040 0000 2966 5507

Alana S. Phillips

[REDACTED]

Sanger, TX 76266

Re: Individual relator's request for Writ of Quo Warranto

Dear Ms. Phillips:

In response to your request for a Writ of Quo Warranto under Chapter 66 of the Texas Civil Practice and Remedies Code, please note your request is unfounded. Denton County Elections Administration uses Hart InterCivic equipment, which is certified for both Texas and Federal elections. Documentation of this certification is available through the Texas Secretary of State and U.S. Election Assistance Commission.

Sincerely,

A handwritten signature in blue ink that reads "John Feldt".

John Feldt

Assistant District Attorney

Denton County Criminal District Attorney's Office

cc: Mr. Frank Phillips

Mr. Paul Johnson

Exhibit 2

Subject: FW: Open Records Request

From: Leyla [REDACTED]

Date: 10/11/21, 14:07

To: Alana Phillips <[REDACTED]>

Hi Alana, sorry I missed their response last week- its Hart 2.4, see below.

Sent from [Mail](#) for Windows

From: [Brandy Grimes](#)

Sent: Wednesday, October 6, 2021 8:46 AM

To: [REDACTED]@hotmail.com

Cc: [Frank Phillips](#); [Records Management](#); [Wally Cochran](#)

Subject: RE: Open Records Request

Good morning Ms. [REDACTED]

Denton County Elections Administration utilized Hart InterCivic's Verity version 2.4 voting system for the 2020 Presidential Election.

Brandy Grimes, CERA
Deputy Elections Administrator
Denton County Elections
(940) 349-3205



From: Frank Phillips <Frank.Phillips@dentoncounty.gov>

Sent: Wednesday, October 6, 2021 8:13 AM

To: Brandy Grimes <Brandy.Grimes@dentoncounty.gov>

Subject: FW: Open Records Request

Will you take care of this one please....thanks!

From: Records Management <RecordsManagement@dentoncounty.gov>

Sent: Wednesday, October 6, 2021 7:58 AM

To: Frank Phillips <Frank.Phillips@dentoncounty.gov>

Subject: Fw: Open Records Request

Frank,

Good morning. Could you please assist this customer?

From: Lois [REDACTED]

Exhibit 3

Sent: Thursday, May 12, 2022 12:52 AM

To: [REDACTED]

Subject: RE: Voter Integrity Process

Here is the response that came in yesterday to my email to Denton County Elections Administrator Frank Phillips. The fact that “the manual is proprietary information that contains security sensitive information that is not releasable” sounds suspicious in my opinion. Enlighten me as to why it has to be that way.

L

Lois,

I was going through my long list of emails and see I didn’t answer this for you. My apologies for the lateness!

- When were the Hart machines last serviced? It really depends on what you mean by “serviced”. In September 2020 we updated to the current version we are on now (2.4.2) and at that time we replaced all of the backup batteries in each device. In the interim we send any equipment that needs maintenance in for whatever an issue may be (printer not working correctly, or something of that nature). Are they up to date? Again, it depends on what you mean by “up to date”. There have been versions released since 2.4.2 but they had no benefit to our version of Verity, which is ballot-on-demand. The newer versions may benefit a county who uses Verity in another configuration, such as DRE or Duo (Tarrant Co), but has not benefit to us so no need to go to the expense to upgrade to the newer version. We anticipate upgrading to a newer version (2.7) in 2023, at which time we will again replace the backup batteries in conjunction with the upgrade. Who is contracted to service them? Only Hart can service the equipment. What does the Hart manual say the procedures are about servicing them? I don’t believe it says anything other than sending equipment in for RMA (our term for “service” which is Routine Maintenance Agreement) Can I get a copy of the manual? The manual is proprietary information that contains security sensitive information that is not releasable.
- Also, what company does Hart get the ballot paper from? We buy our paper from HART – I do not know where they source their paper products from.
- If a risk-limiting audit is called for after an election, who makes that decision, and who determines which boxes of ballots are audited? Auditing is required after each election. The Secretary of State’s office sends us the precincts we have to audit after election day.
- Who would voters contact to request a full forensic audit of Denton County rather than a risk-limiting audit? This has been elaborated on by the Secretary of State’s office many times; there is no legal authority existing for a “full forensic audit”.
- Are all the ballots from the 2020 election still preserved, or have they been deleted? Have all the mail-in envelopes been preserved? How about all digital images, are they still preserved? They are all still preserved per the 22-month post- election preservation requirement.
- On the Electronic Registration Information Center (ERIC), I understand by your response below that any questions regarding ERIC should be addressed to Secretary of State John B. Scott. I understand from a contact of mine in the media that, “The SOS sends the data from ERIC to each county's voter registrar, and they are the ones legally responsible for determining who does and doesn't belong on their local voter rolls.” In the Election Code it says this process is done periodically by the SOS “to the appropriate voter registrars.” So my question is, what date was the last time the Denton County Elections office cleaned up the voter rolls from data sent to them by the SOS? And what was the number of removed dead voters and moved out-of-state voters? How often was cleanup done over the last two years? What are the names of the individuals responsible for the cleanup? Do any volunteer organizations help with this process? Public library staff? Depts. Of Health and Public Safety? DHS? We receive data every day from the SOS, and send them data every day, so “cleanup” is done on a daily basis. This is done by my staff. No other organizations are allowed access to the voter registration system.

- Where is the data stored, and what systems are the data being interfaced with? How is the data prevented from rolling into other third party databases? I'm not sure which data you are referring to but we do not "interface" with third party databases on anything.

Frank Phillips
Denton County Elections Administrator
701 Kimberly Drive
Denton, TX 76208
940-349-3200



Exhibit 4

Duplicate Voters from Nov 3, 2020, according to the County database query.

SOS_VoterID	idnumber	voter_status	lastname	firstname	eligible_date	effective_date	election_code4	vote_type4	registration_date	last_activity_date
1015209495	1399948	C	ROBINSON	MICHAEL	10/31/2020	10/31/2020	1120	E	10/1/2020	12/1/2020
1015209495	1009789	A	ROBINSON	MICHAEL	3/29/2014	7/8/2020	1120	E	2/27/2014	12/1/2020
1055813647	847290	A	BROCK	GARRETT	11/4/2008	10/2/2020	1120	E	10/5/2008	12/1/2020
1055813647	1377429	C	BROCK	GARRETT	10/2/2020	10/2/2020	1120	E	9/2/2020	12/1/2020
1078805648	1404405	C	KIM	AARON	11/3/2020	11/3/2020	1120	E	10/5/2020	12/1/2020
1078805648	766744	A	KIM	AARON	11/15/2006	8/27/2014	1120	E	10/16/2006	12/1/2020
1079049639	1183401	A	DAVIS	JEREMIAH	7/2/2017	10/16/2020	1120	E	6/2/2017	12/1/2020
1079049639	1380103	C	DAVIS	JEREMIAH	10/16/2020	10/16/2020	1120	E	9/16/2020	12/1/2020
1089194190	1302235	A	KIRKLAND	KASSIDY	9/4/2019	10/21/2020	1120	E	8/5/2019	4/16/2021
1089194190	1391793	C	KIRKLAND	KASSIDY	10/21/2020	10/21/2020	1120	E	9/21/2020	12/1/2020
1089578232	643755	A	BIGGERS	TIFFANY	8/15/2003	10/14/2020	1120	E	7/16/2003	12/1/2020
1089578232	1381145	C	BIGGERS	TIFFANY	10/14/2020	10/14/2020	1120	E	9/14/2020	12/1/2020
1089649229	560274	A	COLEMAN	ETHEL	11/7/2000	11/3/2020	1120	E	10/8/2000	12/19/2020
1089649229	1395870	C	COLEMAN	ETHEL	11/1/2020	11/1/2020	1120	E	10/2/2020	12/1/2020
1089782694	1392343	C	WOODARD	ALICIA	11/1/2020	11/1/2020	1120	P	10/2/2020	12/19/2020
1089782694	1252078	A	WOODARD	ALICIA	11/2/2018	11/2/2018	1120	P	10/3/2018	12/21/2020
1090134695	722606	A	AWANI	MURIEL	7/8/2005	7/8/2005	1120	E	6/8/2005	12/1/2020
1090134695	1379285	C	AWANI	MURIEL	10/16/2020	10/16/2020	1120	E	9/16/2020	12/1/2020
1090185003	671967	A	CAUDLE	CASEY	6/20/2004	10/23/2020	1120	E	5/21/2004	12/1/2020
1090185003	1385849	C	CAUDLE	CASEY	10/23/2020	10/23/2020	1120	E	9/23/2020	12/1/2020
1090650722	664349	A	OSBORNE	KATLEYA	3/31/2004	3/31/2004	1120	P	3/1/2004	12/4/2020
1090650722	1396359	C	OSBORNE	KATLEYA	10/25/2020	10/25/2020	1120	P	9/25/2020	12/1/2020
1090747099	1389346	C	WISNER	DANIEL	10/22/2020	10/22/2020	1120	E	9/22/2020	12/1/2020
1090747099	527429	A	WISNER	DANIEL	1/12/2000	10/12/2012	1120	E	12/13/1999	12/1/2020
1151102382	1405110	C	BEHAILU	NOEL	11/3/2020	11/3/2020	1120	E	10/5/2020	12/1/2020
1151102382	800389	A	BEHAILU	NOEL	3/27/2008	11/3/2020	1120	E	2/26/2008	12/1/2020
1156972003	1392697	C	JOHNSON	GYZEIL	10/23/2020	10/23/2020	1120	E	9/23/2020	12/1/2020
1156972003	824097	A	JOHNSON	GYZEIL	10/11/2008	10/23/2020	1120	E	9/11/2008	12/1/2020
1160690704	1380421	C	HODGE	JALISA	10/10/2020	10/10/2020	1120	E	9/10/2020	12/1/2020
1160690704	940435	A	HODGE	JALISA	9/16/2012	10/10/2020	1120	E	8/17/2012	12/1/2020
1163728949	853922	A	RAMOS	FRANCISCO	12/20/2008	10/30/2020	1120	P	11/20/2008	12/21/2020

Duplicate Voters from Nov 3, 2020, according to the County database query.

SOS_VoterID	idnumber	voter_status	lastname	firstname	eligible_date	effective_date	election_code4	vote_type4	registration_date	last_activity_date
1163728949	1393753	C	RAMOS	FRANCISCO	10/30/2020	10/30/2020	1120	P	9/30/2020	12/21/2020
1170689025	876104	S	MAHAN	KYLE	6/4/2010	7/29/2016	1120	A	5/5/2010	7/6/2021
1170689025	1365262	C	MAHAN	KYLE	9/11/2020	9/11/2020	1120	A	8/12/2020	1/27/2021
1172973408	884215	A	UNREIN	BRITTANY	10/10/2010	10/8/2020	1120	E	9/10/2010	12/2/2020
1172973408	1380631	C	UNREIN	BRITTANY	10/8/2020	10/8/2020	1120	E	9/8/2020	12/2/2020
1175001334	889538	A	LAUGHLIN	ASHLEY	11/6/2010	10/25/2020	1120	E	10/7/2010	7/28/2021
1175001334	1381033	C	LAUGHLIN	ASHLEY	10/16/2020	10/16/2020	1120	E	9/16/2020	12/2/2020
1183562256	1214911	A	HORN	BRADLEY	3/30/2018	12/3/2020	1120	E	2/28/2018	12/2/2020
1183562256	1387340	C	HORN	BRADLEY	10/17/2020	12/3/2020	1120	E	9/17/2020	12/2/2020
1186013756	1404639	C	FOWLER	MARY	11/3/2020	11/3/2020	1120	E	10/5/2020	12/2/2020
1186013756	928861	A	FOWLER	MARY	7/12/2012	11/3/2020	1120	E	6/12/2012	12/2/2020
1193424081	1388711	C	PRICE	ALYSON	11/1/2020	11/1/2020	1120	E	10/2/2020	12/2/2020
1193424081	1387010	A	PRICE	ALYSON	10/21/2020	10/21/2020	1120	E	9/21/2020	12/2/2020
1193787310	1165055	A	TECHMANSKI	KIRSTEN	12/8/2016	12/8/2016	1120	E	11/8/2016	12/2/2020
1193787310	1406606	C	TECHMANSKI	KIRSTEN	11/3/2020	11/4/2020	1120	E	10/5/2020	12/2/2020
1193812918	1380407	C	COLES	ELIZABETH	10/10/2020	10/10/2020	1120	E	9/10/2020	12/2/2020
1193812918	959434	A	COLES	ELIZABETH	11/6/2012	10/10/2020	1120	E	10/8/2012	12/2/2020
1197508227	999465	A	NICHOLSON	ALEXANDR	1/3/2014	4/30/2021	1120	E	12/4/2013	4/1/2021
1197508227	1393641	C	RODRIGUEZ	ALEXANDR	10/31/2020	10/31/2020	1120	E	10/1/2020	12/2/2020
1202408439	1347931	S	JONES	SARA	6/19/2020	6/19/2020	1120	P	5/20/2020	7/6/2021
1202408439	1390369	C	JONES	SARA	10/23/2020	10/23/2020	1120	P	9/23/2020	12/2/2020
1202453877	990188	A	LILLY	NATHUNN	9/14/2013	10/9/2020	1120	E	8/15/2013	12/2/2020
1202453877	1385165	C	LILLY	NATHUNN	10/9/2020	10/9/2020	1120	E	9/9/2020	12/2/2020
1202571445	991896	S	NADWODNY	DYLAN	10/4/2013	10/23/2020	1120	E	9/4/2013	7/6/2021
1202571445	1387015	C	NADWODNY	DYLAN	10/23/2020	10/23/2020	1120	E	9/23/2020	12/2/2020
1205085265	1386663	C	ALVIAR	LOUIS	10/12/2020	10/12/2020	1120	E	9/12/2020	12/2/2020
1205085265	1000852	A	ALVIAR	LOUIS	1/1/2014	10/12/2020	1120	E	12/2/2013	12/2/2020
1206772593	1398626	C	SOMBITO	MATTHEW	11/3/2020	11/3/2020	1120	E	10/5/2020	12/2/2020
1206772593	1006233	A	SOMBITO	MATTHEW	3/4/2014	3/4/2014	1120	E	2/3/2014	12/2/2020
1207869648	1380269	C	ROBERTS	LINDSEY	10/15/2020	10/15/2020	1120	E	9/15/2020	12/2/2020
1207869648	1010398	A	ROBERTS	LINDSEY	4/5/2014	10/15/2020	1120	E	3/6/2014	12/2/2020

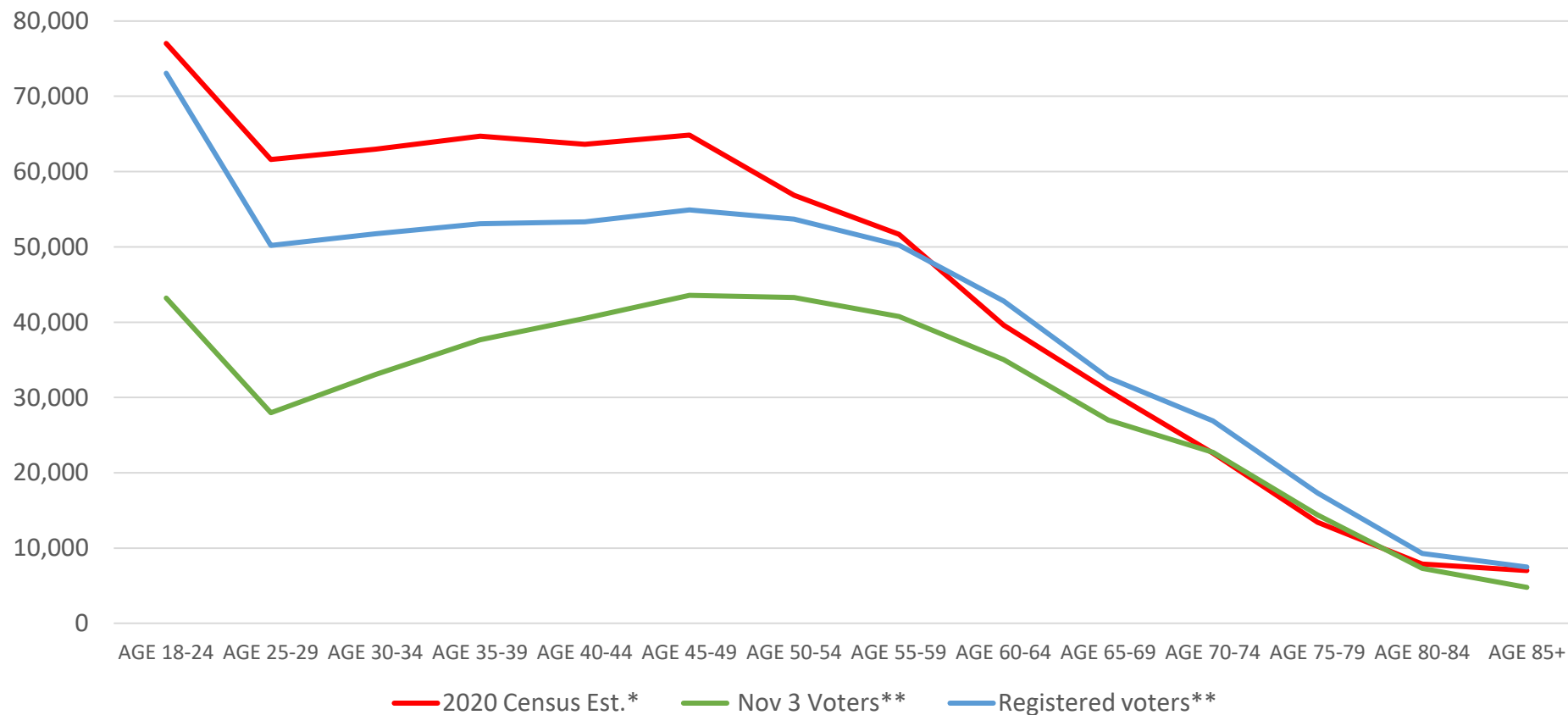
Duplicate Voters from Nov 3, 2020, according to the County database query.

SOS_VoterID	idnumber	voter_status	lastname	firstname	eligible_date	effective_date	election_code4	vote_type4	registration_date	last_activity_date
1211353904	1350203	A	OHIAGU	ROSEANNA	7/8/2020	10/29/2020	1120	E	6/8/2020	12/2/2020
1211353904	1403571	C	OHIAGU	ROSEANNA	10/30/2020	10/30/2020	1120	E	9/30/2020	12/2/2020
1216721042	1405149	C	MONTEZ	JOSHUA	11/3/2020	11/3/2020	1120	P	10/5/2020	11/28/2020
1216721042	1221390	A	MONTEZ	JOSHUA	5/17/2018	11/1/2020	1120	P	4/17/2018	12/30/2020
1218308849	1405646	C	JONES	DENSON	10/30/2020	10/30/2020	1120	E	9/30/2020	11/11/2020
1218308849	1053433	A	JONES	DENSON	4/2/2015	10/30/2020	1120	E	3/3/2015	11/11/2020
1221711679	1412593	A	SIMKINS	KENDYL	11/13/2020	11/13/2020	1120	P	10/14/2020	12/11/2020
1221711679	1393815	C	SIMKINS	KENDYL	11/1/2020	11/1/2020	1120	P	10/2/2020	12/11/2020
2003644963	1231483	A	RAMIREZ	MAIA	8/12/2018	8/12/2018	1120	P	7/13/2018	10/12/2018
2003644963	1380120	A	KRUEGER	JORDAN	10/21/2020	10/21/2020	1120	E	9/21/2020	9/29/2020
2129616785	1386760	C	MCCOWN	JACK	10/23/2020	10/23/2020	1120	E	9/23/2020	12/22/2020
2129616785	1141174	A	MCCOWN	JACK	11/2/2016	10/23/2020	1120	E	10/3/2016	12/22/2020
2129799610	1142383	C	CHEN	JIN	11/5/2016	11/5/2016	1120	E	10/6/2016	12/11/2020
2129799610	1389646	A	CHEN	JIN	10/31/2020	10/31/2020	1120	E	10/1/2020	12/11/2020
2131476879	1401375	C	BROUWER	DEBRA	11/3/2020	11/3/2020	1120	A	10/5/2020	1/14/2021
2131476879	1148117	A	BROUWER	DEBRA	11/8/2016	11/3/2020	1120	A	10/11/2016	12/22/2020
2132236548	1382577	A	FREDRICKSON	DOROTHY	10/18/2020	10/18/2020	1120	A	9/18/2020	12/11/2020
2132236548	1154365	C	FREDRICKSON	DOROTHY	11/8/2016	11/8/2016	1120	A	10/11/2016	12/11/2020
2135030382	1170384	C	MAGDALENO	GILBERTO	1/23/2017	1/23/2017	1120	E	12/24/2016	12/11/2020
2135030382	1402045	A	MAGDALENO	GILBERTO	10/23/2020	10/23/2020	1120	E	9/23/2020	12/11/2020
2136245075	1176752	A	MURPHY	CHARLES	4/28/2017	11/27/2020	1120	E	3/29/2017	12/10/2020
2136245075	1389426	C	MURPHY	CHARLES	10/17/2020	10/17/2020	1120	E	9/17/2020	12/11/2020
2142236532	1207858	C	MCCASLAND	LANDON	2/17/2018	2/17/2018	1120	E	1/18/2018	12/11/2020
2142236532	1396885	C	MCCASLAND	LANDON	10/31/2020	10/31/2020	1120	E	10/1/2020	1/15/2021
2153675481	1380799	C	ROSS	SAMUEL	10/16/2020	10/16/2020	1120	E	9/16/2020	12/8/2020
2153675481	1278426	A	ROSS	SAMUEL	2/8/2019	10/16/2020	1120	E	1/9/2019	12/8/2020
2155010891	1404718	C	SWEAT	JASHIHADA	11/1/2020	11/1/2020	1120	E	10/2/2020	12/8/2020
2155010891	1284908	A	SWEAT	JASHIHADA	4/10/2019	4/10/2019	1120	E	3/11/2019	12/8/2020
2165893828	1400472	A	MCLAURIN	CHRIS	11/3/2020	11/3/2020	1120	E	10/5/2020	12/9/2020
2165893828	1346530	C	MCLAURIN	CHRIS	5/23/2020	11/3/2020	1120	E	4/23/2020	12/9/2020
2169845076	1395872	A	SHAW	HANNAH	10/24/2020	10/24/2020	1120	E	9/24/2020	12/9/2020

Duplicate Voters from Nov 3, 2020, according to the County database query.

SOS_VoterID	idnumber	voter_status	lastname	firstname	eligible_date	effective_date	election_code4	vote_type4	registration_date	last_activity_date
2169845076	1375228	C	SHAW	HANNAH	10/10/2020	10/10/2020	1120	E	9/10/2020	12/9/2020
2171066162	1392225	A	ASBELL	DAWN	10/30/2020	10/30/2020	1120	E	9/30/2020	12/9/2020
2171066162	1379282	C	ASBELL	DAWN	9/18/2020	9/18/2020	1120	E	8/19/2020	12/9/2020
2172892449	1396023	A	ESPINOZA	EMILY	11/1/2020	11/1/2020	1120	P	10/2/2020	12/9/2020
2172892449	1391179	C	ESPINOZA	EMILY	10/21/2020	10/21/2020	1120	P	9/21/2020	12/9/2020

Denton County Voter & Population Data



Denton County History of Voting during Presidential Election Years

Year	Candidates	Registered	Ballots	Percent
2020	Trump/Biden	565,105	420,511	74.41%
2016	Trump/Clinton	468,162	302,835	64.69%
2012	Romney/Obama	391,024	245,287	62.73%
2008	McCain/Obama	346,814	245,781	70.87%
2004	Bush/Kerry	311,772	202,621	64.99%
2000*	Bush/Gore	274,386	146,790	53.50%
1996	Dole/Clinton	207,064	112,270	54.22%
1992*	Bush/Clinton	148,476	116,576	78.52%
AVERAGE				65.49%

Source: Denton County or SoS websites*

Denton County History of Voting

