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28 November 2024

**HONORABLE JAMES D. JORDAN**  
2056 Rayburn House Office Building  
Washing, DC 20515-3504

**SUBJECT: FEDERAL DISCLOSURE ON INTER-AGENCY CONSPIRACY BETWEEN BENJAMIN W. HOVELAND CHAIR, U.S. ELECTION ASSISTANCE COMMISSION (EAC), ALBERT SCHMIDT, SECRETARY OF THE COMMONWEALTH OF PENNSYLVANIA & ASHLEY LUNKENHEIMER CHAIRPERSON, DELAWARE COUNTY BOARD OF ELECTIONS TO SUBVERT THE FEDERAL CRIMINAL INVESTIGATIVE PROCESS INTO WHISTLEBLOWER DISCLOSURE OF UNAUTHORIZED SOFTWARE ON ELECTION MACHINES UTILIZED IN DELAWARE COUNTY, PENNSYLVANIA IN VIOLATION OF 18 U.S.C. § 1505; 18 U.S.C. § 371; 52 U.S.C. § 21081(A)(5); AND 52 U.S.C. § 20510(B)(3)**

1. On 04 April 2024, **ROBERT C. MANCINI**, a cyber security-expert sent a disclosure<sup>1</sup> on *Unauthorized Software on Delaware County's Electronic Vote System* to the following public officials, see Enclosure (1, 2):
  - **BENJAMIN W. HOVLAND:**<sup>2</sup> Chairperson, U.S. Election Assistance Commission (EAC), see Enclosure (3)
  - **ALBERT SCHMIDT:**<sup>3</sup> Secretary of the Commonwealth, Pennsylvania, See Enclosure (4)
  - **ASHLEY LUNKENHEIMER:**<sup>4</sup> Chairperson Board of Elections, Delaware County PA, see Enclosure (5)
  - **JAMES ALLEN:**<sup>5</sup> Director of Elections, Delaware County PA, see Enclosure (5)

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<sup>1</sup> **DISCLOSURE (5 U.S.C. § 2302(a)(D)(2)).** means a formal or informal communication or transmission... the employee or applicant providing the disclosure reasonably believes that the disclosure- (i) any violation of any law, rule, or regulation; or (ii) gross mismanagement, a gross waste of funds, an abuse of authority, or a substantial and specific danger to public health or safety. See: <https://www.law.cornell.edu/uscode/text/5/2302>

<sup>2</sup> **BENJAMIN W. HOVLAND.** Chairman U.S. Election Assistance Commission (EAC). The U.S. EAC is responsible for ensuring that commercially procured voting machines, utilized across the 3,143 U.S. Counties, are properly configured and federally certified for use in elections. See: <https://www.eac.gov/about/commissioner-benjamin-hovland>

<sup>3</sup> **ALBERT SCHMIDT.** Secretary of the Commonwealth of Pennsylvania. "*The Pennsylvania Department of State, led by the Secretary of the Commonwealth, is responsible for ensuring the integrity of the electoral process...*". <https://www.pa.gov/en/governor/meet-governor-shapiro-s-cabinet/al-schmidt.html>

<sup>4</sup> **ASHLEY LUNKENHEIMER.** Chairperson Delaware County Board of Elections, former Assistant U.S. Attorney Eastern District of Pennsylvania (EDPA). See:

<https://delcopa.gov/publicrelations/releases/2022/ashleylunkenheimervotednewchairofdeltcboardofelections.html>

<sup>5</sup> **JAMES ALLEN.** Director of Elections Delaware County, Pennsylvania. See: <https://www.senatormuth.com/wp-content/uploads/2024/09/James-Allen-Testimony.pdf>

2. On 05 April 2024, I received a response e-mail from **JAMES ALLEN** Director of Elections, Delaware County (DELCO), Pennsylvania, “asserting” that the U.S. Election Assistance Commission (EAC) **Certificate of Conformance (CoC)**<sup>6</sup> and the Commonwealth of Pennsylvania **Certificate of Conformance (CoC)**<sup>7</sup> for **HART Verity Voting 2.7 Voting Machine** software were a perfect **MATCH**, see Enclosure (6):

- a. **JAMES ALLEN** Director of Elections, Delaware County (DELCO) **INTENTIONALLY** ignored that:
- (1) During required Logic & Accuracy (L&A)<sup>8</sup> software testing on the **HART Verity Voting 2.7 Voting Machines** **UNAPPROVED** computational software designed to provide methods & algorithms for numerical computations called **Math.Net Numerics**<sup>9</sup> was discovered on the **HART Verity Voting 2.7 Voting Machines**, see Enclosure (2, 3)
  - (2) Software that is not **identified** and **tested** by the U.S. Election Assistance Commission (EAC) approved testing lab **CANNOT** be present on any **HART Verity Voting 2.7 Voting Machine** prior to any scheduled election [Section 1105-A 25 P.S. § 3031.5]
  - (3) The Commonwealth of Pennsylvania Certificate of Conformance (CoC) for the **HART Verity Voting 2.7 Voting Machine** produced by “Acting” Secretary of the Commonwealth **LEIGH M. CHAMPMAN** on 12 January 2023 did not identify an **APPROVED** software called **Math.Net Numerics**<sup>10,11,12</sup>

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<sup>6</sup> **U.S. ELECTION ASSISTANCE COMMISSION (EAC) CERTIFICATE OF CONFORMANCE: HART-VERITY-2.7 VOTING MACHINE.** 07 June 2022. The certificate lists all EAC **TESTED**: (1) Proprietary Software, (2) Commercial Off the Shelf (COTS) Software, and (3) Firmware, pg. 11-12. The software package **MathNet.Numerics**- a free open-source numerical computation software, available from Massachusetts Institute of Technology (MIT), was not **TESTED** or **APPROVED** for use in HRT-Verity-2.7 voting machines. See:

[https://www.eac.gov/sites/default/files/voting\\_system/files/Cert.%20and%20Scope%20of%20Conformance%20Verity%20Voting%202.7%20FINAL.pdf](https://www.eac.gov/sites/default/files/voting_system/files/Cert.%20and%20Scope%20of%20Conformance%20Verity%20Voting%202.7%20FINAL.pdf)

<sup>7</sup> **COMMONWEALTH OF PENNSYLVANIA CERTIFICATE OF CONFORMANCE: HART-VERITY-2.7 VOTING MACHINE.** 12 January 2023. The certificate lists all U.S. Election Assistance Commission (EAC) **TESTED**: (1) Proprietary Software, (2) Commercial Off the Shelf (COTS) Software, and (3) Firmware, pg. 11-12. The software package **MathNet.Numerics**- a free open-source numerical computation software, available from Massachusetts Institute of Technology (MIT), was not **TESTED** or **APPROVED** for use in HRT-Verity-2.7 voting machines. See: <https://www.pa.gov/content/dam/copapwp-pagov/en/dos/programs/voting-and-elections/voting-systems/certification/Hart-Verity-Voting-2.7-Final-for-web.pdf>

<sup>8</sup> **PENNSYLVANIA STATE LOGIC & ACCURACY (L&A) TESTING.** Directive 1 of 2024, 07 Mar 2024 Ver. 3.0. pg. 25-28. All counties must perform pre-election logic & accuracy testing on software loaded onto commercially procured election voting equipment to be used in upcoming elections. L&A testing includes testing & validation of the software to ensure the software **MATCHES** the Commonwealth of Pennsylvania Certificate of Conformance- HART-VERITY-2.7 VOTING MACHINE software identified on page 25-28 and Pennsylvania Logic and Accuracy (L&A) Directive demand to confirm compliance identified on page 04. See: <https://www.pa.gov/content/dam/copapwp-pagov/en/dos/resources/voting-and-elections/directives-and-guidance/2024-Directive-on-Logic-Accuracy-Testing-3.0.pdf>

<sup>9</sup> **MATH.NET NUMERICS.** Computational software designed to provide methods & algorithms for numerical computations. See: <https://numerics.mathdotnet.com>

<sup>10</sup> Ibid., 9

<sup>11</sup> **LEIGH M. CHAPMAN** “Acting” Secretary of the Commonwealth. See:

<https://www.opensocietyfoundations.org/newsroom/open-society-foundations-names-leigh-chapman-as-new-director-for-democracy-building-work-in-u-s>

<sup>12</sup> See Footnote #7



3. On 30 May 2024, I received a letter from **SARA E. DRYER**, U.S. Election Assistance Commission (EAC) Deputy Inspector General (EAC-DIG), appointed in early May 2024 as the “Acting” EAC Inspector General (EAC-IG) by **BRIANNA M. SCHLETZ**,<sup>13</sup> EAC Inspector General (EAC-IG) selected in April 2024 by **BENJAMIN W. HOVLAND** Chairperson, U.S. Election Assistance Commission (EAC) as the “new” EAC Executive Director:<sup>14</sup>

- In the e-mail response from **BRIANNA M. SCHLETZ**, “Acting” Inspector General (EAC-IG), she claimed: *“unfortunately this matter falls outside the jurisdiction of the EAC Office of Inspector General (OIG). The best place to receive help on your request is to reach out to your state election officials...”*, see Enclosure (7)

a. Despite properly addressing serious wrongdoing **DIRECT** to **BENJAMIN W. HOVLAND** Chairperson, U.S. Election Assistance Commission (EAC), his “acting” Inspector General (IG) **SARA E. DRYER** ignored:

1. Election software integrity compliance calling into question the integrity of the software utilized on the **838 HART VERITY VOTING 2.7** election machines in Delaware County, PA<sup>15,16</sup>

2. **Misappropriation**<sup>17</sup> of \$1M in Congressionally apportioned federal grant funds sent to Secretary of State **ALBERT SCHMIDT** who allocated **\$0.5M** of the federal grant to Pennsylvania’s (67) county election boards for allowable expenditures such as **Cyber Security** (tasks associated with cyber security such as monitoring software, staffing, training, contracts for services, and maintenance of any voting systems):<sup>18,19</sup>

b. Choosing to “ignore” the inviolate responsibility inherent with the U.S. Election Assistance Commission (EAC) Office of Inspector General (OIG):

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<sup>13</sup> **BRIANNA M. SCHLETZ** U.S. Election Assistance Commission (EAC) Inspector General (**EAC-IG**). Selected by **BENJAMIN W. HOVLAND (D)** Chairperson, U.S. Election Assistance Commission (EAC) to be **Executive Director** of the U.S. Election Assistance Commission (EAC). See: <https://www.eac.gov/news/2024/03/12/us-election-assistance-commission-announces-appointment-brianna-schletz-executive#:~:text=Schletz%20was%20unanimously%20appointed%20by,director%20begins%20March%2025%2C%202024>

<sup>14</sup> **SARA E. DRYER** U.S. Election Assistance Commission (EAC) Deputy Inspector General (**EAC-DIG**). Selected by **BRIANNA M. SCHLETZ (EAC-IG)** to be the “Acting” EAC Inspector General (EAC-DIG) a month after **BRIANNA M. SCHLETZ (EAC-IG)** is selected to become the Executive Director of the U.S. promoted to “Acting” EAC-IG a month after the EAC Inspector General **BRIANNA M. SCHLETZ** becomes the Executive Director U.S. Election Assistance Commission (EAC). See:

<https://oig.eac.gov/meet-inspector-general> & <https://www.eac.gov/news/2024/03/12/us-election-assistance-commission-announces-appointment-brianna-schletz-executive#:~:text=Schletz%20was%20unanimously%20appointed%20by,director%20begins%20March%2025%2C%202024>

<sup>15</sup> **HART VERITY VOTING 2.7**. A commercially procured voting machine utilized in selected counties across America manufactured by Hart InterCivic Inc. See: <https://www.eac.gov/voting-equipment/verity-voting-27>

<sup>16</sup> **HART INTERCIVIC INC.** See: <https://www.hartintercivic.com> & [https://en.wikipedia.org/wiki/Hart\\_InterCivic](https://en.wikipedia.org/wiki/Hart_InterCivic)

<sup>17</sup> **THEFT OR BRIBERY CONCERNING PROGRAMS RECEIVING FEDERAL FUNDS (18 USC § 666)**. See: <https://www.law.cornell.edu/uscode/text/18/666>

<sup>18</sup> **FURTHER CONSOLIDATED APPROPRIATIONS ACT 2024 (P.L. 118-147)**. See: <https://www.congress.gov/118/plaws/publ47/PLAW-118publ47.pdf>

<sup>19</sup> **HELP AMERICA VOTE ACT (HAVA) 2024 ELECTION SECURITY GRANT FUND (PENNSYLVANIA)**: <https://www.pa.gov/en/agencies/dos/resources/voting-and-elections-resources/federal-grants/2024-federal-grants.html>

1. “Acting” Inspector General **SARA E. DRYER** “elected” to exercise statutory IG investigative “prerogative”, under **5a U.S.C. §7**, to artfully employ the administrative **Rules of Construction** [**shall** -vs- **may** investigate]<sup>20</sup> to support **NOT** “reporting” credible disclosure of criminal wrongdoing

2. “Acting” Inspector General **SARA E. DRYER** willfully **IGNORED** Inspector General (IG) statutory duty to report to the Attorney General that there were reasonable grounds to believe there were **violations** of Federal criminal law under [**5 U.S.C. §404(d)**]<sup>21,22,23</sup>

4. As of the date of this Congressional disclosure, I have yet to receive a response from **ALBERT SCHMIDT**, Secretary of the Commonwealth Pennsylvania, in violation of 18 U.S.C. §1346-Denial of the Intangible Right to Honest Services.<sup>24</sup>

5. As of the date of this Congressional disclosure, I have not received a response from **ASHLEY LUNKENHEIMER** Chairperson Board of Elections, Delaware County PA, in violation of 18 U.S.C. §1346-Denial of the Intangible Right to Honest Services.

6. As an American citizen exercising my 1<sup>st</sup> Amendment right to petition my government for repress of grievance (whistleblower disclosure), I seek your immediate assistance in addressing this clear & present insider threat to governmental transparency and accountability directly impacting on free and fair elections.

**ROBERT C. MINCINI**

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<sup>20</sup> **RULES OF CONSTRUCTION** [49 CFR §171.9(b)(1)- **SHALL**/49 CFR §171.9(b)(4)-**MAY**]. See: <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-I/subchapter-C/part-171/subpart-A/section-171.9>

<sup>21</sup> **INSPECTOR GENERAL ACT OF 1978 AS AMENDED** [5a U.S.C. §4(D)]. “In carrying out the duties and responsibilities established under this Act, **each** Inspector General **shall** report expeditiously to the **Attorney General** whenever the Inspector General has reasonable grounds to believe there has been a **violation** of Federal **criminal** law.

<sup>22</sup> **5 U.S.C. §404(D)- REPORTING VIOLATION OF FEDERAL CRIMINAL LAW**. “In carrying out the duties and responsibilities established under this chapter, each Inspector General **shall** report expeditiously to the **Attorney General** whenever the Inspector General has reasonable grounds to believe there has been a **violation** of Federal criminal law. See: <https://uscode.house.gov/view.xhtml?req=granuleid%3AUSC-prelim-title5-chapter4&edition=prelim>

<sup>23</sup> **MEMORANDUM FOR HEADS OF EXECUTIVE DEPARTMENT AND AGENCIES (M-22-04)**: Promoting **Accountability** through Cooperation among Agencies and Inspectors General, “Acting” Director Office of Budget & Management (OMB) **SHALANDA D. YOUNG**, 03 Dec 2021. See: <https://www.whitehouse.gov/wp-content/uploads/2021/12/M-22-04-IG-Cooperation.pdf>

<sup>24</sup> **DENIAL OF THE RIGHT TO HONEST SERVICES (18 U.S.C. §1346)**. “For the purposes of this chapter, the term “**scheme or artifice to defraud**” includes a scheme or artifice to deprive another of the intangible right of honest services. See: [https://www.law.cornell.edu/definitions/uscode.php?width=840&height=800&iframe=true&def\\_id=18-USC-1034014607-980273003&term\\_occur=999&term\\_src=title:18:part:I:chapter:63:section:1346](https://www.law.cornell.edu/definitions/uscode.php?width=840&height=800&iframe=true&def_id=18-USC-1034014607-980273003&term_occur=999&term_src=title:18:part:I:chapter:63:section:1346)



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Senate Committee Homeland Security & Govt. Affairs  
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Honorable James R. Cormer Jr. (KY-01)  
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Committee Oversight & Accountability  
2410 Rayburn House Office Building  
Washington, DC 20515-1701

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117 Abbey Terrace. 390  
Drexel Hill, PA 19026

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Chairman  
U.S. Election Assistance Commission  
633 3rd Street NW, Suite 200  
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Commissioner Thomas Hicks  
U.S. Election Assistance Commission  
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[U.S. Press Freedom Tracker](#)

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Vice Chairman  
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Commissioner Christy A. McCormick  
U.S. Election Assistance Commission  
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Chairperson Ashley Lunkenheimer  
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**UNAUTHORIZED SOFTWARE ON DELAWARE COUNTY'S  
ELECTRONIC VOTING SYSTEM**

Copies of this letter initially sent to:

Pennsylvania Department of State

401 North Street, rm 302

Harrisburg PA 17120

Attn Secretary Schmidt

US Election Assistance Commission

633 3<sup>rd</sup> St NW Suite 200

Washington DC 20001

Attn Commissioner Hovland

201 West Front Street

Media PA 19063

Attn: James Allen Director of Elections

Delaware County Bureau of Elections

201 West Front Street

Media PA 19063

qAttn: Ashley Lunkenheimer



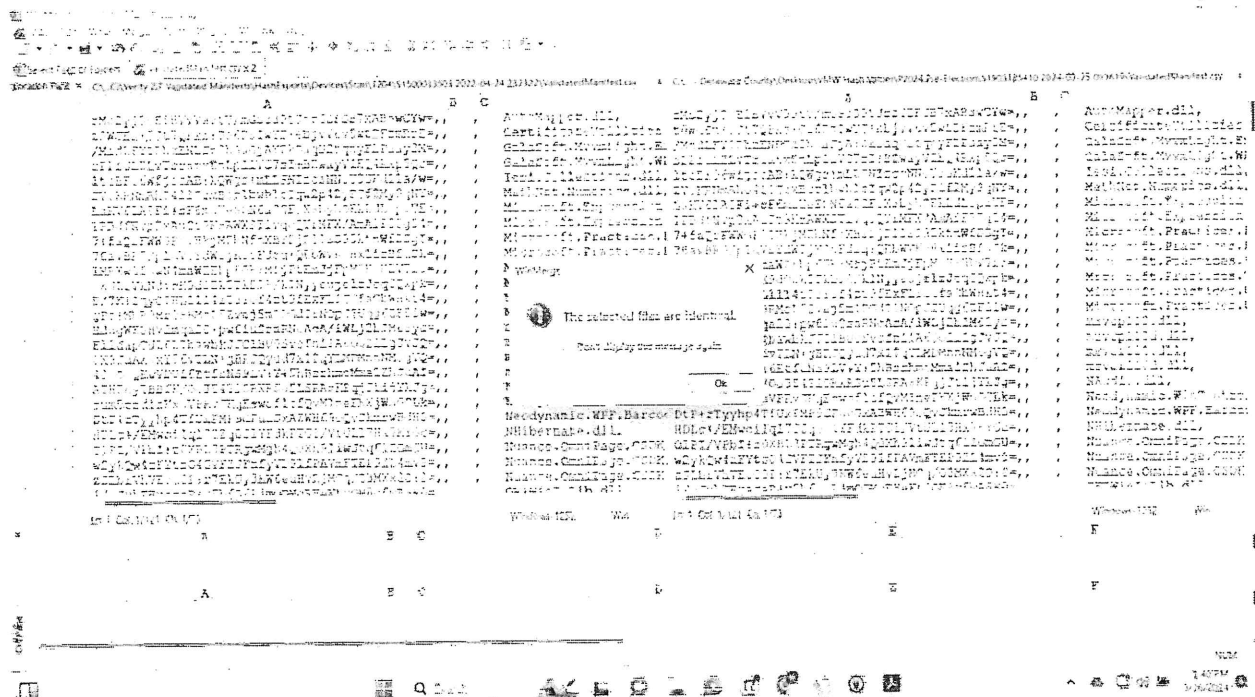
# UNAUTHORIZED SOFTWARE ON DELAWARE COUNTY'S ELECTRONIC VOTING SYSTEM

Dear Mr. Allen with copies to Mr. Schmidt, Ms. Lunkenheimer and Mr. Hovland

There is unauthorized software on Delaware County's Hart Verity 2.7 Electronic Voting System.

**This requires immediate attention!**

On or About March 25, 2024 Delaware County performed a secure build validation (what you call hash testing) on only 9 of the County's 428 precinct machines. On the partial manifest a file appears, Mathnet.Numerics.Dll. see below just above the popup.



- 1) This is the dynamic link library for Mathnet.Numerics software  
[ <https://numerics.mathdotnet.com>].
- 2) This software is used for manipulation of data.
- 3) This software is NOT listed on The PA Department of State Certification of the system  
[<https://www.dos.pa.gov/VotingElections/Documents/Voting%20Systems/Hart%20Verity%20Voting%202.7/Hart%20Verity%20Voting%202.7%20Final%20for%20web.pdf>]
- 4) This software is NOT listed in the EAC test report for Hart 2.7, specifically section 2.1 software and firmware.  
[[https://www.eac.gov/sites/default/files/voting\\_system/files/Hart%20Verity%202.7%20EAC%20Electrical%20Hardware%20Test%20Plan%20v3.0.pdf](https://www.eac.gov/sites/default/files/voting_system/files/Hart%20Verity%202.7%20EAC%20Electrical%20Hardware%20Test%20Plan%20v3.0.pdf)]

## **UNAUTHORIZED SOFTWARE ON DELAWARE COUNTY'S ELECTRONIC VOTING SYSTEM**

- 5) This software is NOT listed in the EAC Trusted Build for Hart 2.7  
[[https://www.eac.gov/sites/default/files/voting\\_system/files/Attachment%20E%20-%20Trusted%20Build%20Record%20for%20Verity%20Voting%202.7.1\\_0.pdf](https://www.eac.gov/sites/default/files/voting_system/files/Attachment%20E%20-%20Trusted%20Build%20Record%20for%20Verity%20Voting%202.7.1_0.pdf)]

This are several actions that need to be immediately taken.

- 1) Those machines need to be immediately secured
- 2) An investigation of how that software appeared in the system need to be conducted. This would include an inspection of the administrator logs due to the fact that software cannot be installed with Administrator privileges and whenever software is installed, that will show up on the Administrator Logs.
- 3) A complete Secure Build validations on all machines in Delaware County need to be inspected to see if that software is on all machine.
- 4) Delaware County needs to be more forthcoming and open about records pertaining to Elections

As Pennsylvania is a state that will be paramount in determining the outcome of the 2024 Election, full public disclosure is a must!!!

V/R

Robert Mancini

4 Guernsey Lane



Media PA 19063

Delcocyber@gmail.com




Enclosure (2)

# Software Integrity Testing HART Verity Voting 2.7 Election Machines

 United States Election Assistance Commission  
Certificate of Conformance  
Hart Verity Voting 2.7  


The voting system identified on this certificate has been evaluated at an accredited voting system testing laboratory for conformance to the *Voluntary Voting System Guidelines Version 1.0 (VVG 1.0)*. Components evaluated for this certification are detailed in the attached Scope of Certification document. This certificate applies only to the specific version and release of the product in its evaluated configuration. The evaluation has been verified by the EAC in accordance with the provisions of the *EAC Voting System Testing and Certification Program Manual* and the conclusions of the testing laboratory in the test report are consistent with the evidence adduced. This certificate is not an endorsement of the product by any agency of the U.S. Government and no warranty of the product is either expressed or implied.

Product Name: Verity Voting  
Model or Version: 2.7  
Name of VSTL: SLI Compliance  
EAC Certification Number: HRT-Verity-2.7  
Date Issued: June 7, 2022

  
Executive Director  
Scope of Certification Attached

U.S. Election Assistance Commission (EAC)  
Hart Verity Voting 2.7 Election Machine  
Certificate of Conformance

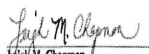
State of Pennsylvania  
Hart Verity Voting 2.7 Election Machine  
Certificate of Conformance

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF STATE

REPORT CONCERNING THE EXAMINATION RESULTS OF HART  
VERITY VOTING 2.7 WITH VERITY SCAN PRECINCT SCANNER,  
VERITY COUNT TABULATING AND REPORTING SOLUTION,  
VERITY CENTRAL - CENTRAL SCANNING SOLUTION, VERITY  
TOUCH WRITER AND TOUCH WRITER DUO BALLOT MARKING  
DEVICE, AND VERITY DATA ELECTION DATA ENTRY SOFTWARE  
AND VERITY BUILD ELECTION DEFINITION SOFTWARE



Issued By:

  
Leigh M. Chapman  
Acting Secretary of the Commonwealth  
January 12, 2023

Software loaded on the Hart Verity Voting 2.7 election machine **TESTED** by the U.S. Election Assistance Commission (EAC) testing laboratory (SLI Compliance) **MUST** match software loaded on the HART Verity Voting 2.7 election machines purchased for use in Delaware County, PA [25 P.A. § 3031.5- Section 1105-A]

On 04 May 2024, whistleblower **ROBERT C. MANCINI** disclosed to:

- **BENJAMIN W. HOVLAND** Chairperson, U.S. Election Assistance Commission (EAC);
- **ALBERT SCHMIDT**, Secretary of State (SecState)
- **ASHLEY LUNKENHEIMER**, Chair, Delaware County Board of Elections (BoE)

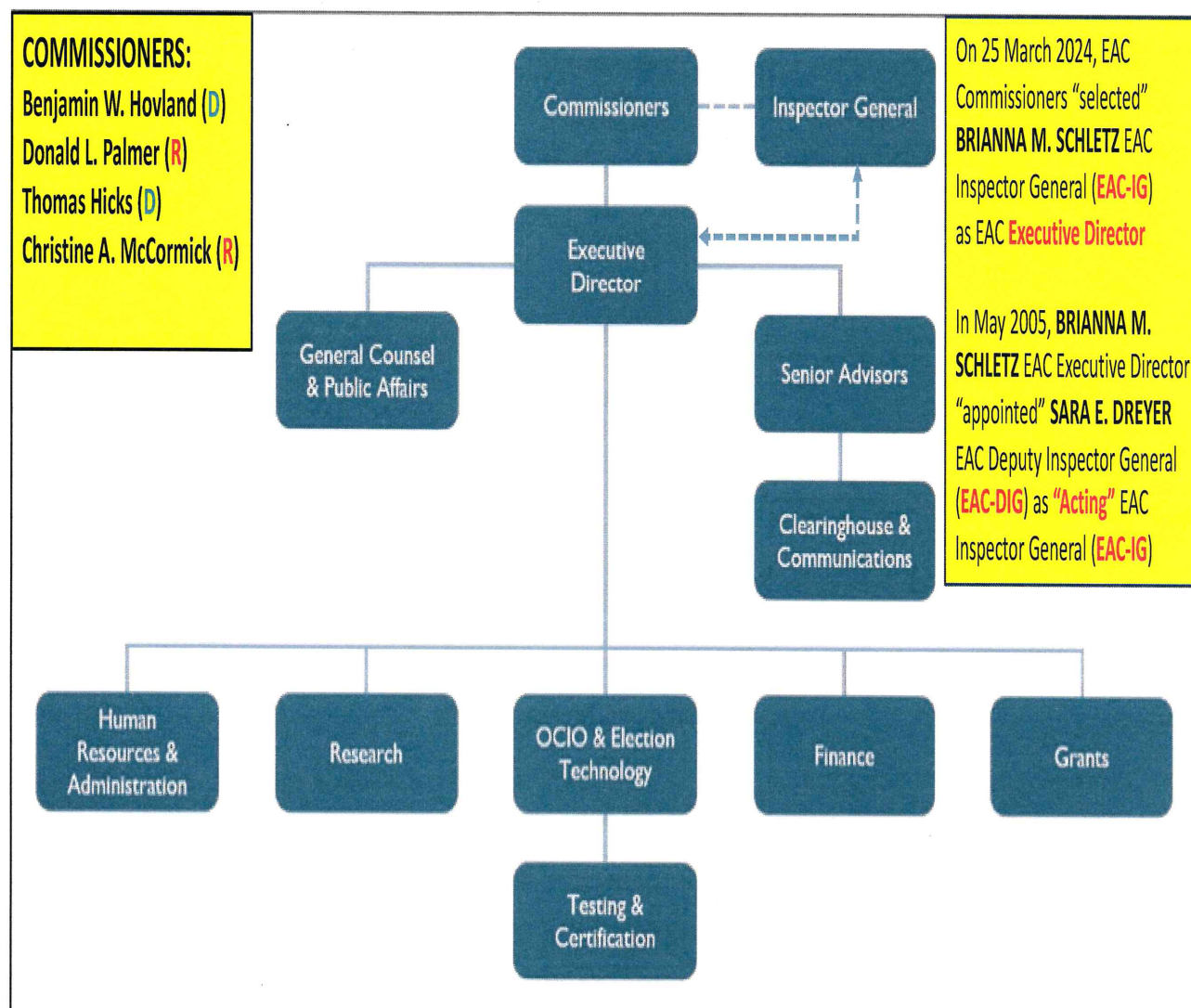
that during Logic & Accuracy (L&A) testing on Hart Verity Voting 2.7 election machines **UNAPPROVED** software [MathNet.Numerics] was discovered

On 05 May 2024, **JAMES ALLEN**, Director of Elections Delaware County, falsely "claimed" software testing "matched" the **Certificate of Conformance** ignoring presence of **UNAPPROVED** software [Math.Net Numerics] on Delaware County's Hart Verity Voting 2.7 voting machines

# U.S. Election Assistance Commission (EAC)<sup>©</sup>

**Figure I. EAC Organizational Chart**

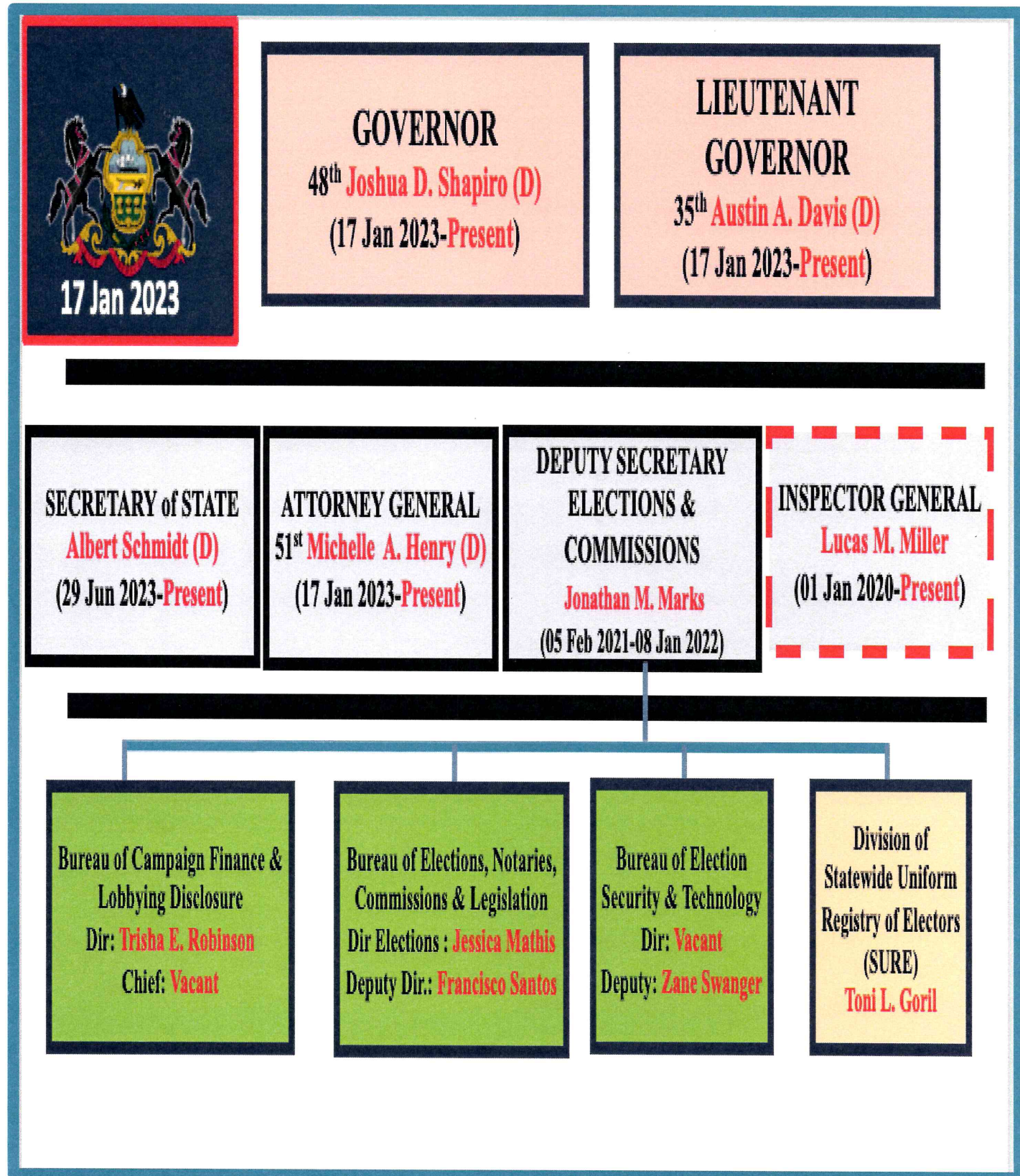
(As of FY2023)



**Source:** CRS, based on EAC, *Fiscal Year 2023 Congressional Budget Justification*, p. 8, at [https://www.eac.gov/sites/default/files/cbj/US\\_EAC\\_FY\\_2023\\_Congressional\\_Budget\\_Justification\\_508\\_FINAL.pdf](https://www.eac.gov/sites/default/files/cbj/US_EAC_FY_2023_Congressional_Budget_Justification_508_FINAL.pdf).



Enclosure (4)





Enclosure (5)



Delaware County  
Pennsylvania

DELAWARE COUNTY COUNCIL  
CHAIRPERSON

DR. MONICA TAYLOR (D)

DELAWARE COUNTY COUNCIL  
VICE CHAIRPERSON

RICHARD R. WOMACK (D)

COUNCIL MEMBER

KEVIN M. MADDEN (D)

COUNCIL MEMBER

ELAINE PAUL SCHAEFER (D)

COUNCIL MEMBER

CHRISTINE A. REUTHER (D)

DISTRICT ATTORNEY (DA)

JACK STOLLSTEIMER (D)

COUNTY SHERIFF

JERRY L. SANDERS JR (D)

COUNTY CONTROLLER

JOANNE PHILLIPS

OFFICE OF THE SOLICITOR

JONATHAN LICHTENSTEIN (D)



Delaware County  
Court of Common Pleas

PRESIDENT JUDGE LINDA A. CARTISANO (D)

(2009-PRESENT)

DELAWARE COUNTY COUNCIL

(2002-2009)

DELAWARE COUNTY SOLICITOR OFFICE

(2012-2017)

JUDGE JOHN J. WHELAN (D)

(2018-PRESENT)

DELAWARE COUNTY DISTRICT ATTORNEY

(2012-2017)

DELAWARE COUNTY COUNCIL

(2005-2010)

Board of Elections

CHAIRPERSON

ASHLEY  
LUNKENHEIMER (D)

MEMBER

JOHN  
McBLAIN (R)

MEMBER

SCOTT  
ALBERTS (D)

DIRECTOR OF ELECTIONS

JIM ALLEN (D)





Robert Mancini &lt;delcocyber@gmail.com&gt;

**RE: (EXTERNAL) Re: (EXTERNAL) Re: (EXTERNAL) Re: (EXTERNAL) Re: (EXTERNAL) Re: Successful hash-testing results**

Allen, Jim <AllenJ@co.delaware.pa.us>  
To: Robert Mancini <delcocyber@gmail.com>  
Cc: OpenRecords <OpenRecords@co.delaware.pa.us>

Fri, Apr 12, 2024 at 1:12 PM

Robert Mancini,

Your request falls squarely under the Election Code, and is not covered under Right to Know, consistent with court rulings on OOR findings.

Accordingly, this response is being provided under the Election Code.

Jim

**James P. Allen**

Elections Director

Delaware County, Pennsylvania

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**From:** Robert Mancini <delcocyber@gmail.com>  
**Sent:** Friday, April 12, 2024 11:30 AM  
**To:** Allen, Jim <AllenJ@co.delaware.pa.us>  
**Cc:** OpenRecords <OpenRecords@co.delaware.pa.us>  
**Subject:** (EXTERNAL) Re: (EXTERNAL) Re: (EXTERNAL) Re: (EXTERNAL) Re: (EXTERNAL) Re: Successful hash-testing results

**Caution:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. When in doubt, contact your IT Department

Right to know request. As delco seems to have a peculiar interpretation of the law i am filing it with both RTK and dept of Elections

On Wed, Apr 10, 2024 at 6:29 PM Allen, Jim <AllenJ@co.delaware.pa.us> wrote:

**Enclosure ( 6 )**

Robert Mancini,

I cannot and do not represent the EAC or the Department of State.

There is no unauthorized software, just your astounding leap to a wrong conclusion based on a document that does not portend to list all of the software examined by the VSTL during the certification process.

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For the fourth time, we have hash tested against the EAC's hash, and all of the software on the Delaware County Hart equipment tested was a 100% match to the EAC-issued hash for this very same equipment. The only evidence we have is that all of the software is 100% correct.

Lastly, feel free to appeal to the state now – as we are not the agency to represent the EAC or the Department of State.

Jim

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**From:** Robert Mancini <[delcocyber@gmail.com](mailto:delcocyber@gmail.com)>

**Sent:** Wednesday, April 10, 2024 6:02 PM

**To:** Allen, Jim <[AllenJ@co.delaware.pa.us](mailto:AllenJ@co.delaware.pa.us)>; OpenRecords <[OpenRecords@co.delaware.pa.us](mailto:OpenRecords@co.delaware.pa.us)>

**Subject:** (EXTERNAL) Re: (EXTERNAL) Re: (EXTERNAL) Re: (EXTERNAL) Re: Successful hash-testing results

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Mr. Allen, you should be in possession of such a document, or in the process of acquiring it both from the EAC and DoS is you are not negligent in you duties. I have already requested them as i know you would be less than forthcoming, which begs the question what are you hiding.

As the person responsible for the machines and the unauthorized software, you should be investigating the matter, unless your are negligent.

You cannot say that you did not know, as by this correspondence you are aware of the software and are certain of your position.

I will give you the five business days before i appeal to the state. Attached again is the County RTK officer.

the documents are

This is a now officially a right to know request, please provide

- 1) the document that lists the software (Mathnet.Numerics) as tested by the EAC and Department of State.
- 2) the procedure the EAC specifies after discovering a voting machine that has unauthorized software on it.
- 3) Please produce a copy of the 9 machine administrator logs that you "hash" tested from the time that Hart 2.7 was installed (Feb11,2023) to present.
- 4) The procedure the DOS specifies after discovering a voting machine that has unauthorized software on it.

v/r

Robert Mancini

On Wed, Apr 10, 2024 at 9:15 AM Allen, Jim <[AllenJ@co.delaware.pa.us](mailto:AllenJ@co.delaware.pa.us)> wrote:

Robert Mancini,

If you are in search of more documents from the EAC, you need to contact the EAC.

The hash test of the software fingerprint on the Hart equipment used by Delaware County was successful, in that it was a 100% match to the hash provided by the EAC for the Hart equipment.

Jim

2-6



**From:** Robert Mancini <[delcocyber@gmail.com](mailto:delcocyber@gmail.com)>

**Sent:** Tuesday, April 9, 2024 6:33 PM

**To:** Allen, Jim <[AllenJ@co.delaware.pa.us](mailto:AllenJ@co.delaware.pa.us)>

**Subject:** (EXTERNAL) Re: (EXTERNAL) Re: (EXTERNAL) Re: Successful hash-testing results

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1) I will take that as a know to my RTK request for all documents, and if you read the Election Code, those documents are public

2) Please provide me the EAC document you referenced that mentions mathnet.numerics and you can end this real fast..If you cannot provide the EAC document that mention mathnet.numerics I will have to escalate this matter.

On Mon, Apr 8, 2024 at 5:54 PM Allen, Jim <[AllenJ@co.delaware.pa.us](mailto:AllenJ@co.delaware.pa.us)> wrote:

Robert Mancini,

First off, election records are covered under the Election Code, not Right to Know.

Next, we have provided the documentation in question and are not going to enter into a debate about something that has already been demonstrated and established as fact – that the software fingerprint (or hash) on Delaware County's Hart equipment is 100% identical to the software fingerprint (or hash) issued by the EAC for this very same Hart equipment. The very document that you cited in your complaint last week lists the software that you question on **both the Delaware County side of the hash test for the Hart equipment – and the EAC side of the hash test for the Hart equipment.**

Again, Delaware County's software hash test was successful and proved that Delaware County's Hart equipment contains only the software authorized by the EAC for the Hart equipment.

If you care to dispute that, you need to contact the EAC about its hash and/or its software listings.

Jim

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**From:** Robert Mancini <[delcocyber@gmail.com](mailto:delcocyber@gmail.com)>

**Sent:** Monday, April 8, 2024 5:02 PM

**To:** Allen, Jim <[AllenJ@co.delaware.pa.us](mailto:AllenJ@co.delaware.pa.us)>; OpenRecords <[OpenRecords@co.delaware.pa.us](mailto:OpenRecords@co.delaware.pa.us)>

**Subject:** (EXTERNAL) Re: (EXTERNAL) Re: Successful hash-testing results

I copied Delaware Counties RTK office.

3-6

**Caution:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. When in doubt, contact your IT Department

Mr Allen, Only the software listed in The EAC Certification and The Department of State certification (which I provided you) are allowed. If it is allowed it would be listed there. KNOWINGLY operating an Electronic Voting System that is not in the configuration tested by the EAC and DoS is almost certainly a crime. I suggest you investigate it, especially since you acknowledged under oath that you do not understand the technical aspects of a system. Please show me the document that lists that software, The EAC whitelists software use on the Trusted build, any software not on that build is not allowed on the system.

This is a now officially a right to know request, please provide

- 1) the document that lists the software (Mathnet.Numerics) as tested by the EAC and Department of State.
- 2) the procedure the EAC specifies after discovering a voting machine that has unauthorized software on it.
- 3) Please produce a copy of the 9 machine administrator logs that you "hash" tested from the time that Hart 2.7 was installed (Feb11,2023) to present.
- 4) The procedure the DOS specifies after discovering a voting machine that has unauthorized software on it.

On Sat, Apr 6, 2024 at 4:59 PM Allen, Jim <[AllenJ@co.delaware.pa.us](mailto:AllenJ@co.delaware.pa.us)> wrote:

Robert Mancini,

A certification does not need to reference every program and subcomponent that was tested during the certification. To wit, "The **hash codes** for all system components were captured using the process listed in the manufacturer's Technical Data Package (TDP) by the Functional Examiner with assistance from a Hart representative. The Functional Examiner further compared and confirmed that all the captured hash codes matched the hash codes for the EAC certified system executables before executing the test scripts."

From there, you have jumped to completely wrong conclusions. Delaware County has the proper software running on the Hart equipment and has verified that with the hash test. Our hash test matched the very hash codes, referenced above, from the EAC. Additionally, our hash testing is not required, but Delaware County is among the very few (if not the only) jurisdiction in Pennsylvania to perform this extra level of testing and review on randomly selected equipment. The hash testing is an extra, optional layer of testing that is not required by the certification or the Department of State directive on Logic & Accuracy testing. The recent hash testing, as well as all previous hash testing ahead of elections, was successful.

Next, you are yet again mischaracterizing and misrepresenting the trusted build validation and confusing it with an actual trusted build. Delaware County has performed the validation on every machine ahead of every election and after every election by examining the tapes that validate that the equipment is running on Hart Verity 2.7. (Prior to 2023, it was an earlier iteration and the same process for validation – checking the tapes.) You are wrongly confusing **validating** a trusted build with actually **performing** a top-to-bottom trusted build. Performing a top-to-bottom trusted build is done by the VST Laboratory – at the federal certification process, not by a local jurisdiction performing Logic & Accuracy testing. The VSTL performs the trusted build to emulate the vendor's manufacturing process and the vendor's instructions for using the balloting system. The trusted build includes starting with hardware components and then loading all of the vendor's software components before using that software to: program a mock election; print ballots for that mock election; test the mock-election ballots; program the voting equipment for the mock election; executing the mock election; gathering the mock election results; and then verifying that all of the systems functioned as designed to the standards required by law. Again, that is a process for the VST Laboratory to perform at federal certification. The trusted build is not a process for the local jurisdiction to perform at Logic & Accuracy testing. In Logic & Accuracy, the jurisdictions perform a **validation** by examining the power-on self-test report. Any time the device is powered on, a report prints out with a time stamp and **firmware version**.

4-6



Again, the hash testing was successful and the Logic & Accuracy was successful. Through it all, the testing and validations verified that the proper programs are running on the Hart voting equipment that is being used by Delaware County's voters and poll workers.

Jim

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**From:** Robert Mancini <delcocyber@gmail.com>  
**Sent:** Saturday, April 6, 2024 3:45 PM  
**To:** Allen, Jim <AllenJ@co.delaware.pa.us>  
**Subject:** (EXTERNAL) Re: Successful hash-testing results

**Caution:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. When in doubt, contact your IT Department

Attached is a copy of the DOS certification, can you please reference the Software in question?

I will also refer you to page 28 subsection J which requires you to do a certify build on all machines, not just 9.

On Fri, Apr 5, 2024 at 11:14 PM Allen, Jim <AllenJ@co.delaware.pa.us> wrote:

Robert Mancini,

We are in receipt of the misinformation that you submitted (dated April 4, 2024) about the Hart equipment used by Delaware County and about the very recent and very successful hash testing that Delaware County performed to verify that our balloting systems and equipment contain only the correct, proper and certified software.

The very graphic you included stated the results of the very successful hash test: "The selected files are identical." In other words, the hash test of the software fingerprint on Delaware County's Hart voting equipment perfectly matched (and matches) the fingerprint of the software that was certified for use for that very same Hart equipment. That software certification was completed first by the United States Election Assistance Commission, and then completed by the Pennsylvania Department of State.

Further, please note the following information from the vendor, Hart, in response to your inquiry: The specific part of the DLL software that you (Robert Mancini) cited is a known and tested component of the Hart Verity voting system. This specific part of the DLL software is and always has been part of the tested, certified product and it correctly belongs on this balloting system for its proper use and accurate tabulations of votes. The Voting System Test Laboratory (VSTL), in accordance with the Help America Vote Act (HAVA), conducted thorough security testing as part of the certification process, including a full source-code review of all software components. The specific DLL that you (Robert Mancini) cited is a proper and correct subcomponent of the Hart audio engine, which is a part of the common software library that is included on all certified Hart devices.

5-6

Again, and in closing, only the exact software that was included in the EAC certification process for the Hart Verity equipment is loaded on the Hart Verity voting equipment that is being used by Delaware County. The very recent and very successful hash testing verified that fact.

**James P. Allen**

Elections Director

Delaware County, Pennsylvania

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**2 attachments**

 **2024-L&A-Attestation-Delaware-County-04-05.pdf**  
304K

 **M2023-L-and-A-Certification-Delaware-10-21.pdf**  
158K





Robert Mancini &lt;delcocyber@gmail.com&gt;

**RE: To Inquiry Related to Delaware County's Voting System**

1 message

EACOIG &lt;eacoig@eac.gov&gt;

Thu, May 30, 2024 at 9:07 AM

To: "Delcocyber@gmail.com" &lt;Delcocyber@gmail.com&gt;

Good Morning,

Thank you for your message, unfortunately this matter falls outside the jurisdiction of the EAC Office of Inspector General. The best place to receive help on your request is to reach out to your state election officials. You can access their information by following the link below and selecting which state you currently live in.

<https://www.eac.gov/voters/register-and-vote-in-your-state>

Thank you,

U.S. Election Assistance Commission

Office of Inspector General

**Enclosure ( 7 )***PAGE 12-12*