

## **Declaration of Seth Keshel**

Pursuant to 28 U.S.C Section 1746, I, Seth Keshel, make the following declaration.

1. I am over the age of 21 years and I am under no legal disability, which would prevent me from giving this declaration.
2. I am a trained data analyst with experience in multiple fields, including service in the United States Army as a Captain of Military Intelligence, with a one-year combat tour in Afghanistan. My experience includes political involvement requiring a knowledge of election trends and voting behavior.
3. I reside at (redacted).
4. My affidavit highlights substantial deviance from statistical norms and results regarding voting patterns in Pennsylvania.
5. All 2020-related voting totals are taken from the Decision Desk HQ unofficial tracker, are not certified, and are subject to change from the time of the creation of this affidavit.
6. Pennsylvania has shown a steady decrease in support for Democratic presidential nominees since Barack Obama won the state by 10.32% in 2008. He won Pennsylvania again in 2012, but only by a margin of 5.38%, and Republican Donald Trump won the state by 0.71% in 2016.
7. As part of an overall working-class voter shift, Pennsylvania has moved in the same manner as Wisconsin, Ohio, Michigan, and Minnesota – decreasing levels of support for Democratic nominees, and by consequence of this shift, increasing levels of support for

Republican nominees. This shift is captured in visual form in Exhibit A to this affidavit.

8. Pennsylvania is the only state in a group of three locally contested states, including Michigan and Wisconsin, that registers its voters by party. Party registration is the single most accurate predictor of a subsequent election. When President Obama was elected, the Democrats had a 14.2% registration advantage over the Republicans, and President Obama won by 10.32%. The registration advantage has improved for Republicans since then, leading each time to either a smaller margin of defeat (2012), or a victory (2016). Since the 2016 Trump victory in the state, the Republicans have cut another three points from the Democratic registration advantage. The trend in the last four years suggests substantial gains for Trump in the 2020 election in Pennsylvania. This data is provided by the Pennsylvania Secretary of State and is captured in Exhibit B.
9. President Trump succeeded in “flipping” the region in 2016 because he converted many two-time Obama voters into Trump voters. Obama-to-Trump counties gave him wins in Pennsylvania, Michigan, and Wisconsin, and nearly Minnesota. Since Pennsylvania registers voters by party, it is verified that all five counties (Erie, Luzerne, Lackawanna, Monroe, Northampton) that either flipped to Trump, or nearly flipped to Trump have trended steadily Republican in registration since 2016. Historical analysis shows that a trend to either party benefits that party in victory margin expansion or loss margin reduction in the following election. At this point in the uncertified count, president Trump has lost significant margin in

Luzerne County (though he still holds it), has lost Erie and Northampton Counties (which he won in 2016), and has lost ground in Monroe and Lackawanna Counties, completely reversing the established trends favoring the party making the most gains in registration leading up to the election. Current registration advantages are as follows: Luzerne, Democrat +9.0%; Erie, Democrat +12.0%; Northampton, Democrat +9.3%; Monroe, Democrat +11.9%; Lackawanna, Democrat +26.0%. More information is available in Exhibit C.

10. In keeping with party registration, an indicator of overall performance correlates closely to the number of registered voters in each party. A higher number than the established baseline indicates a stronger performance not only within the party, but with party crossovers and independent voters. A lower number indicates defections from the party and poor base turnout. This number, which I refer to as Votes per 100 Registered (Party Name), is calculated as (Number of Votes for Party Candidate)/(Number of Registered Voters in Candidate's Party). This number has tracked the statewide registration trend, especially since the Democratic peak of 2008 with President Obama atop the ballot. President Obama obtained 73.1 votes for every 100 registered Democrats in 2008, and as the Democratic registration advantage declined, so did his support number (70.1) in his re-election. On the inverse, the Republican numbers rose, and have continued to do so, with Donald Trump over 95 votes per 100 registered Republicans thus far in the counting. Particularly concerning regarding the integrity of this

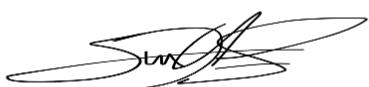
election is the fact that Joe Biden is now over 81 votes per 100 registered Democrats, a sharp increase that defies the underlying state party registration totals and the downward trajectory of the past three election cycles. Biden's estimate for this statistic was likely less than 69 given recent election trends and ongoing registration. A visual representation of this statistic at the state level is available in Exhibit D.

11. Florida is considered a key national bellwether (indicator) state, and it is closely correlated to Pennsylvania, Michigan, and other midwestern states. Since 1968, Pennsylvania and Michigan have always trended in the same direction that Florida did in a presidential election. This year, Florida moved more than two points in favor of the Republican candidate, but for the first time in modern political history, Pennsylvania and Michigan moved to the left from their previous positions in 2016. This is an alarming disruption of a very reliable bellwether that matches the disruption in the statewide registration trends noted above. The corresponding chart containing information on this trend is shown in Exhibit E.
12. Pennsylvania contains four bellwether counties with a Democratic registration advantage. They are Luzerne, Erie, Northampton, and Lackawanna Counties. Luzerne County has gone to the winner of Pennsylvania, regardless of party, in every presidential election since 1936. It was won by Donald Trump in 2016 and is still held by Trump in 2020. Since at least 1952, if a Republican has carried Luzerne County, not only has he carried Pennsylvania, but also Michigan each time. Registration trends suggested Trump would

once again carry Erie County, which has been paired with victory in Wisconsin when carried by a Republican since at least 1952. A Republican carrying Lackawanna County has coincided with a national landslide on all three occasions it has been carried in the past century (1956, 1972, and 1984). Trump narrowly lost that county in 2016, and it trended roughly six points Republican in registration in the past four years. If this result is not reversed, this would be the first election in which Luzerne County failed to be won by the winner of the state. This deviation from a longstanding bellwether further suggests a Democratic performance that is highly unusual. These trends may be observed visually in Exhibit F.

13. In keeping with strong registration trends favoring the Republican Party, President Trump has added substantially more votes in counties that supported him strongly in 2016, as well as other counties that held back support. Republican strength has been building since the end of the 2008 election, and has manifested itself by adding votes for Republicans, while dropping votes from Democrats, making the margins even wider. This trend has reversed in 2020, despite party registration suggesting otherwise. In a sample of 12 key counties that have trended Republican since 2016, which was taken on November 6 (meaning some vote totals have shifted in the unofficial count), President Trump has made vote gains, but had had his margins erased by unforeseen Biden support that defies trend analysis for nearly two decades. This visual is available in Exhibit G.

14. When examining the Votes per 100 of Candidate's Registered Party statistic at the county level, deviations from current trends are once again obvious. Exhibits H, I, and J show Southeastern Pennsylvania, Southern and Eastern Pennsylvania, and Western Pennsylvania counties, respectively, in relation to how the Democratic Party performed in obtaining votes for every 100 registered Democrats in each county. Southeastern Pennsylvania is practically the only region of Pennsylvania in which the Democratic Party is expanding its margins in voter registration, but this statistic accounts for growth in registration rolls. As such, all counties listed in Exhibit H appear suspicious in their significant spike in support for the Democratic Party.
15. President Trump's performance (over 95 votes per 100 registered Republicans) to this point has drastically improved his standing from 2016, but Vice President Biden's totals defy two elections and three registration cycles worth of predictive analysis. President Trump's performances in counties strongly favoring him show tremendous growth in votes but are often absorbed by larger Biden gains which are not supported in registration trend analysis or historical performance over two decades. The statistical deviations are valid without regard to the obvious transparency issues with collecting and reporting mail-in ballots.

A handwritten signature in black ink, appearing to read "Steve Johnson".

Seth Keshel

17 Nov. 2020