**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

KENNETH ZIMMENN, A Harris County)
Registered Voter, and WILLIAM SOMMER, A)
Harris County Registered Voter,)
)
       Plaintiffs,)
)
    v.)   Civil Action No.
)
JUDGE LINA HIDALGO, in her official)
capacity as County Judge for Harris County, Texas)
TENESHIA HUDSPETH, in her official)
capacity as County Clerk for Harris County, Texas,)
)
       Defendants.)
)

Affidavit of Rick Weible

I, Rick Weible, being first duly sworn upon my oath state as follows:

1.   I am of sound mind, over eighteen years of age, and competent to testify to the facts contained in this affidavit. These facts are based upon my personal knowledge and are true and correct.

2.   I currently reside at 803 Elk Street, Elkton, SD 57026.

3.   I am a certified computer network engineer and data analysis expert with over 25 years of industry experience.

4.   I am also the owner of a small computer consulting company that has been in business for over 25 years providing compliance certifications, desktop support, programming, network management and security, web development and hosting.

5.   I founded the United States Council on Accurate and Secure Elections in 2023 and have been analyzing elections in multiple states helping both election officials and voters

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better understand the election systems in an effort to have better oversight and security in our elections by following Federal and State Laws.

6.   I have been retained to serve as an expert in other election matters and have been asked to serve as an expert in this matter as well.

7.   Through my previous work in election matters, extensive research into election machine software and hardware, and personal experience having reviewed election machine equipment, software, reports, results and tests throughout the country, including Harris County, Texas, I have specialized knowledge and expertise that I believe will be helpful to address certain matters in the above-captioned litigation.

8.   I am aware of the security risks that on-line digital voter rolls present, in that there are time stamps in the backend systems as to when a voter signed in as well as what location and pollbook was used to enter in data.

9.   I am aware of the risks that voter centers present in creating unintended markers for data when a unique voter votes a unique ballot from another precinct, that is, a ballot that is different from most of the other ballots voted on in a precinct, and then inserted into a tabulator.

10.   Using these unintended markers can expose how the randomization process works when reviewing multiple precincts across a county. One unintended marker is the grouping in a one hundred ballot scenario, and then exposing the lack of randomization, as the voting system provides for the saving of ballot images and cast vote records.

11.   Think of markers in a deck of cards that if I mark the back of the cards for all aces with a blue pen on all four corners and then mark all kings with a red pen on all four corners and we play poker and I am the one with the knowledge of where those cards are, I have a better chance of knowing when to bet and fold, that in the end I would win the card game with that

knowledge. At the same time it would also make it easier to count cards knowing what is left in the last hand at the end of the deck, and make a significant bet in my favor.

12.   For advanced systems think of it like a 100-piece puzzle with no picture on the box, we look for markers to start solving that puzzle. The first 4 markers would be the corners and then the edges. When it comes to voters, that would be the party identifications of voters and known people in the precinct, they are my corners and edges. Then as you look at the rest of the puzzle you can see things that go together in pairs and styles. Just like a puzzle as you get closer to completing the picture of the puzzle, it all fits together.

13.   So any time a unique voter votes outside of their precinct they create markers that identify unique ballots, and the more unique ballots created across the county with unique voters is way of giving me the code of the combination of the lock to unlock and to know what the randomization pattern, otherwise knows as the combination of how they are randomizing the ballots.

14.   When a voter checks in to the voter registration system, and then is handed a unique ballot the time date stamp of that moment, the ballot style, the precinct, and location of where he is voting is all logged into the voter registration system.

15.   Then when that voter votes on a paper based ballot and then inserts the ballot into the tabulator, the tabulator takes a picture of both sides the ballot, at the same time, creating an image, and then it creates an interpretation file of how it read the ballot, called a cast vote record, CVR, both of those files are time stamped with the time and date of the opening of the election on that tabulator. These files are saved in the tabulator, and on the USB thumb drives at the same time, during the election.

16.   As other voters are voting, once the grouping of the 100 votes has been processed, the tabulator randomizes the file names, and it does this process every 100 ballots in these groups.

17.   At the end of the voting session, election officials take the thumb drives, and insert them into the Election Management System, where the ballot images and the cast vote records are then decrypted and loaded into the system for reporting, reviewing, and exporting.

18.   When exporting these ballot images and cast vote records, one can export all of the ballots by the precinct, or by the tabulator, into their named folders. In evaluating by tabulator, one can easily figure out randomization process and look at the voter registration system and start tying the unique ballots from a precinct back to the one person who voted in another precinct.

19.   Once you have mapped out the unique ballots, you can start mapping out the randomization process and see if there are any correlations. Once that is established, you can then map the rest of the voters' ballots to the voter registration check in system.

20.   I have deduced voter's ballots even without using the ballot images and cast vote records, in unique precincts in Minnesota. The systems in Minnesota are similar to the one used by Harris County. It is possible to determine a person's vote by simply looking at the precinct results and the registration of the unique voter.

21.   I have reviewed cast vote records and registrations in other states using systems similar to Harris County's and have been able to identify voters' ballots when they were unique voters in a vote center. In non-vote center locations, it is much more difficult to determine the order, since the markers of ballot variations is minimized to prevent detection of the randomization process being used. If I can discover the algorithm used for the county, I can

determine more of the voters' ballots. I have decoded the algorithm used for randomization in other states.

22.   At this point I have not reviewed the Harris County records, but I would be willing to review the records if permitted and asked. I believe, based upon my prior experience with Harris County's voting system used in other states, that I will be able to discern Harris County voters' ballots in the 2024 General Election because it is similar the other systems in which I have discovered the algorithms they use for randomization.

23.   I further believe, based upon my work in other states, that I can develop an algorithm which will allow me to discern many more voters' ballots beyond the unique voter deduction method.
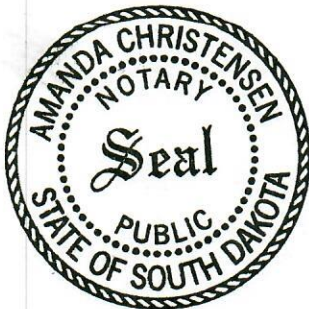
DATED this __8__ day of November 2024.

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Rick Weible

SUBSCRIBED and SWORN to before me by Rick Weible on this __8__ day of ~~October~~ Nov 2024

_____
NOTARY

10/6/28

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