EXHIBIT C

John Liccione email exchange with Kirby Keider regarding IP address discovery production extension and attached
VR Systems Voter Focus Software On-Line User Manual
Sections and Screenshots Showing IP Addresses

14 Pages Total

ELECTRONICALLY FILED 10/28/2024 10:49:13 PM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

Gmail John Liccione <jliccione@gmail.com>

Re: RFP Extension Request Conversation 10.21.2024

1 message

John Liccione <jliccione@gmail.com> Mon, Oct 21, 2024 at 7:57 PM
To: "Kreider, Kirby" <kkreider@pinellas.gov>

Ms. Kreider,

I am writing to address the inaccuracies and incomplete nature of your email recap regarding our phone conversation, which lasted over 15 minutes, and to provide you relevant records of VR Systems itself.

During that call, we discussed two separate matters:

1. **Meeting Request:** I inquired about meeting with your client in person to discuss election fraud concerns. You informed me that your client is unavailable due to them being too busy.

2. **Discovery Extension Request:** The majority of our conversation revolved around your request for a 45-day extension on discovery related to the IP addresses and related information for mail ballot orders received on 6/23/2024. Here is a summary of the key points:

    - Discovery is due on 10/28, 45 days after your client was served. You requested an additional 45 days, stating that your client needs more time because they must rely on an external contractor to obtain the requested information.
    - When I acknowledged that your client does not have the information internally and needs external assistance, presumably from VR Systems, you seemed to backtrack on your initial statement.
    - You also appeared hesitant or unwilling to commit to whether your client will be able to produce the requested records at all. When I asked if the contractor could at least confirm the availability of the records, you refrained from providing any assurance. Without a clear guarantee of delivery, I see no reason to agree to a 45-day extension.
    - I also mentioned that VR Systems' Voter Focus software captures the IP addresses of all online mail ballot requests, as detailed in their on-line user manual. You seemed unfamiliar with this, and indicated that this is outside your area of expertise.

For your reference, I have attached four relevant sections from the Voter Focus online user manual, including "About Capturing Questionable Vote-by-Mail Requests from the Web" and "How to Process Vote-by-Mail Requests Submitted on Your Website." These documents clearly show that Voter Focus captures and retains IP addresses and integrates them into its fraud detection case management system.

Given that the PSOE likely has staff trained on Voter Focus, generating the necessary reports should be a simple task. Even if no one internally is trained, VR Systems, with its administrative privileges, can easily produce a report showing the IP addresses of mail ballot orders from 6/23/2024. This is central to my case, and I trust you understand its importance.

Therefore, all that is required to obtain the IP addresses and timestamps is a single email or phone call to VR Systems' CEO, from either you, Matt Smith, or your IT team. While I can issue a subpoena for this information, such delays are becoming obstructive.

In light of this, your request for an additional 45 days, without any commitment to produce the records, is untenable. You have already had six weeks to generate a report that takes less than five minutes to run.

If necessary, I will subpoena the CEO of VR Systems to testify and produce the records, which would be a public spectacle. However, I urge you to provide at least the IP addresses and timestamps for the 219,000+ ballot orders from 6/23/2024 by Tuesday. As an officer of the court, now informed that the software your client uses routinely collects and retains the requested information, you are professionally obligated to produce it without further delay.

Failure to do so may result in discovery sanctions.

Regards,

John Liccione

On Mon, Oct 21, 2024 at 2:48 PM Kreider, Kirby <kkreider@pinellas.gov> wrote:

> Good Afternoon,
>
> Please let this email serve to confirm the contents of our conversation today. The County has requested an additional 45 days to be able to answer the request for production in this matter. The request for extension is not a comment on the content of the request rather the extension request was made in good faith to be able to fully respond to the best of our capabilities.
>
> I've attached my co-counsel Mr. Keefe on this email.
>
> Thank you,
>
> **Kirby Z. Kreider**
>
> Assistant County Attorney
>
> Pinellas County Attorney's Office
>
> 315 Court Street, 6th Floor
>
> Clearwater, FL 33756
>
> Phone: (727) 464-3354
>
> Fax: (727) 464-4147
>
> kkreider@pinellas.gov
>
> *All government correspondence is subject to the public records law.*

4 attachments

QuestionWebRequestsPageShowingIPAddressesCircled.png
396K

FraudDetectionParametersInterface.png
196K

About Capturing Questionable Vote-By-Mail Requests from the Web.pdf
421K

How to Process Vote-by-Mail Requests Submitted on Your Website.pdf
281K

https://content.vrsys.co/help/vf/Content/Vote_by_Mail/Dialog__Vote-by-Mail_Fraud_Detection_Parameters.htm

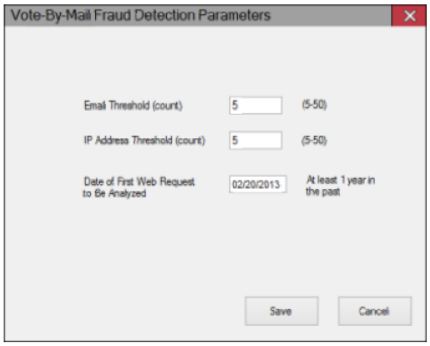
VoterFocus

Overview and Basics | Features | Administration | References

Search

Vote-By-Mail Fraud Detection Parameters

To access: **Vote By Mail > Vote-By-Mail Fraud Detection > Utility**



On this dialog, you establish the parameters under which the fraud-detection *program runs*. For more about this facility, see About Capturing Questionable Vote-By-Mail Requests from the Web.

Fields and Controls on this Dialog

Email Threshold	The number of requests having the same email address that will cause the program to capture the requests.
IP Address Threshold	The number of requests having the same IP address that will cause the program to capture the requests.
Date of First Web Request to be Analyzed	The date at which the program should begin evaluating web requests. This date must be at least a year in the past. The program will look at all requests submitted on this date and thereafter until today, including those that have already been processed into voter records.

Vote by Mail
- Copy Vote-by-Mail Requests from a Prior Election
- Deliver Ballots
- Email List of Candidates
- Mail-Ballot Adjustments
- Return Ballots
- Maintain Requester Information
- Maintenance--Vote-by-Mail Tab
- Name Format for Labels/Data Files
- Print Envelope Sort Order
- Print Replacement Ballots
- Process Undeliverable Ballot Images
- Pull List of Voter Changes
- Release Ballot
- Relia-Vote Utilities
- Reprint Mail-Ballot Labels or Envelopes
- Resend an Email
- Retrieve Images-Generic Envelope Reader
- Return Ballots Batch Header
- Return Ballots Batch Header-Generic Envelope Reader
- Review Returned Ballots
- Select Type of Voter
- Vote-by-Mail Addresses
- Vote-by-Mail Flexible Report
- Vote-by-Mail Fraud Detection Case Details

https://content.vrsys.co/help/vf/Content/Vote_by_Mail/Report__Questionable_Web_Requests_for_an_Election.htm

Questionable Web Requests for Spring Election

Voter Id	Matches
Absentee Request Fax Number Matches	
502747319	8506682838
502747529	8506682838
502747756	8506682838
Absentee Request Requestor Matches	
502778201	Jones, Tom Addr1: 145 Fake St.
502778201	Jones, Tom Addr1: 145 Fake St.
Mailing Address Matches	
502016584	[MAIL 1, MCITY 34233]
502747432	[MAIL 1, MCITY 34233]
Web Absentee Request Destination Email Address Matches	
502120014	support@vrsystems.com
502747003	support@vrsystems.com
502747321	support@vrsystems.com
502747583	support@vrsystems.com
502747600	support@vrsystems.com
502747600	support@vrsystems.com
502747715	support@vrsystems.com
502747715	support@vrsystems.com
502779720	support@vrsystems.com
Web Absentee Request Source IP Address Matches	
502120014	12.123.45.243
502747321	12.123.45.243
502747583	12.123.45.243
502747600	12.123.45.243
502747600	12.123.45.243
502747715	12.123.45.243
502747715	12.123.45.243
502747003	12.123.65.243
502779720	12.123.65.243

MENU

eb Requests for an

Last Updated: 12/12/2023

ion

Detection Reports

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ber, and voter ID.

ring Questionable

Vote-by-Mail Reports
- Absentee Activity Dump
- Absentee Alert Report
- Absentee Audit Report
- Absentee Ballot Balance Sheet
- Absentee Ballots Issued by Ballot Style
- Absentee Ballots Issued by Operator
- Absentee Ballots Not Voted
- Absentee Ballots where Return Is Blocked
- Absentee Ballot Style Changes
- Absentee Request Activity
- Absentee Requests by Non-Family Requesters
- Absentee Request Totals by How Requested
- Absentee Status for All Absentee Voters
- Absentee Status for Domestic Voters
- Absentee Status for Email/Fax-Delivery Voters
- Absentee Totals for an Election
- Active Cases in Vote-by-Mail Fraud Detection

Capturing Questionable Vote-By-Mail Requests from the Web

Voter Focus offers an optional feature to help detect fraudulent Vote-By-Mail requests submitted on your website through the Absentee/Mail Ballot Request Form. The requests are blocked from being processed into voter records, thus preventing the release of mail ballots to those intent upon voter fraud.

To use this feature, you run the Fraud Detection program, which scans requests from a specified time period, looking for those originating from the same IP address or having the same email address for ballot delivery. Requests whose addresses present no issue are passed to the Web Request Queue for processing into voter records. But questionable requests are detained for user review.

During your review, you can release a detained request to the Web Request Queue or you can put an indefinite hold on it. Where an address is known to be legitimate, you can set the Fraud Detection program to pass all requests associated with that address.

The Fraud Detection feature is under **Vote By Mail > Vote-By-Mail Fraud Detection**. To see this feature, your county must have this option selected:

VOTER FOCUS ADMIN > System Options > Vote By Mail > Use Vote-By-Mail Fraud Detection

And the user must have the permission:

VoteByMailFraudDetection

We recommend you run the Fraud Detection program and evaluate its findings on a daily basis.

How Fraud Detection Works

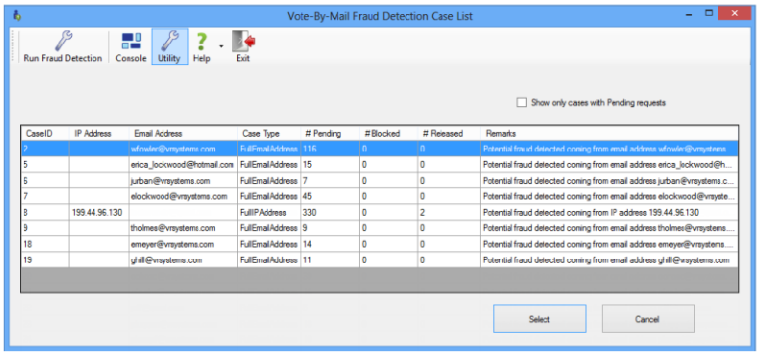
The Fraud Detection program uses these parameters on the Vote-By-Mail Fraud Detection Parameters dialog to determine whether a request should be held for review:

Email Threshold—The number of requests having the same email address at which the program will begin capturing the requests. For example, if the threshold is 5, the program will pass the first four requests with this email address but will detain the fifth and all subsequent requests with this address.

IP Address Threshold—The number of requests having the same IP address at which the program will begin capturing the requests. As with the email threshold, the program will detain any request meeting or exceeding the threshold.

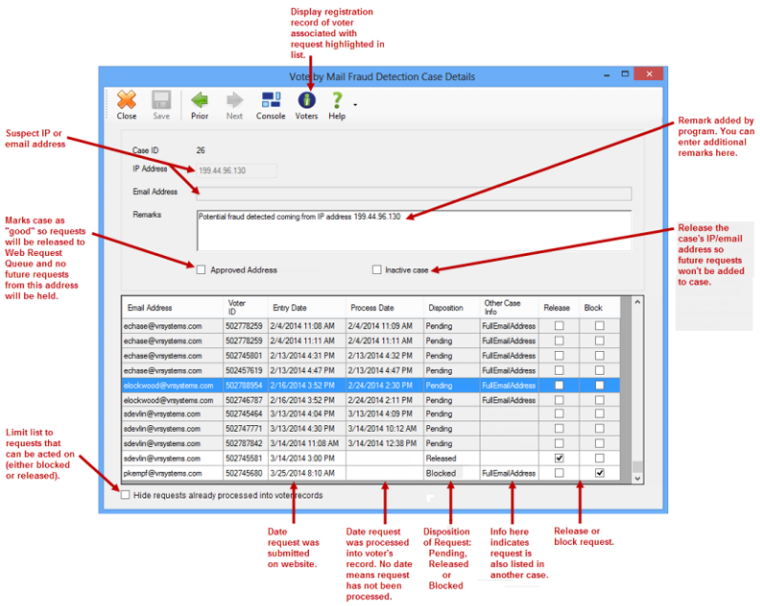
Date of First Web Request to be Analyzed—The date at which the program will begin evaluating web requests. This date must be at least a year in the past. The program will look at all requests submitted on this date and thereafter until today, including those that have already been processed into voter records.

The program checks all requests submitted on the website, beginning with the first request on the start date, placing a hold on any request exceeding the email or IP address threshold, except for those that have already been processed into voter records. It then presents the user with its findings, organized as a list of fraud cases, as shown in the screenshot below. Each case contains the web requests exceeding the threshold for a particular IP or email address.



You can then open a case, examine its requests, and make determinations on individual requests within the case or a general determination on the case itself:

- For individual requests, you can either release the request, block it, or leave it pending. A released request goes to the Web Request Queue where it can then be processed into the voter's record by the county user responsible for web request processing. Released requests continue to appear in the case list, as do requests that have been processed. If you don't want to see processed requests, you have the option of hiding them, so you can focus on requests that can still be acted upon.
- For cases where the address is known to be legitimate, you can mark the address as approved, which releases all requests in the case to the Web Request Queue and allows any future requests associated with the address to be passed by the fraud detection program. Approving an address lets you pass requests from known locations, such as public libraries, where voters might use public computers to submit Vote-By-Mail requests.



Disposition of Requests

Web requests have one of three dispositions:

Pending—For counties using fraud detection, all web requests are assigned this disposition when they come into the Voter Focus system.

> **Note:** For counties not using fraud detection, web requests are automatically assigned the Released disposition when they enter the system. Should a county turn on the fraud detection option, those requests will appear in a case should either of their addresses meet a threshold, but their disposition will remain

Released. Should the county turn off fraud detection, the disposition of all web requests will be changed to Released.

Released—This disposition is assigned by the user upon determination that the request is legitimate. It allows the request to enter the Web Request Queue for processing into the voter's record. Requests with the disposition Released will continue to appear in the case, even after they have been processed. If a county does not use fraud detection, all web requests are assigned the disposition Released.

Blocked—This disposition is assigned by the user upon determination that the request is fraudulent. It prevents entry of the request into the Web Request Queue. Should a Blocked request be reevaluated later as legitimate, it can be released by selecting the **Release** check box on the Vote By Mail Fraud Detection Case Details dialog.

If a request appears in more than one case and you change its disposition in one of those cases, the change will be reflected in the other case.

Running the Fraud Detection Program

To run the Fraud Detection program, go to **Vote By Mail > Vote-By-Mail Fraud Detection > Run Fraud Detection**. During the run, if the programs finds new requests matching an existing case, it adds those requests to the case and displays a message indicating how many were added. If the program finds a new address meeting one of the prescribed thresholds, it will ask if you want to create a new case. If you say yes, the new case is added to the list of existing cases on the Vote-By-Mail Fraud Detection Case List dialog. If you say no, the requests associated with the suspect address will still be marked as Pending, even though a case has not been created. On subsequent runs of the program, if the same thresholds are used, you will be asked again if a new case should be created for those requests.

When counting the requests to meet one of the prescribed thresholds, the program does not consider whether a request has already been processed from the Web Request Queue into a voter's record. The first requests from an IP or email address that do not meet the threshold will not be stopped by the Fraud Detection program, so it is possible that a new case will contain requests that have already been processed, delivered, and perhaps even voted. (The same is true for requests processed before the county began using the fraud detection facility.) These requests cannot be "pulled back" or otherwise blocked by the Fraud Detection program.

The program does not evaluate the election for which a request is being made; requests for different elections can appear in a single case.

An all-elections request is considered a single request for the purpose of the Fraud Detection program.

Approving "Good" Addresses

In situations where an IP or email address is from a known legitimate source, you can mark the address as approved. This releases all requests in the case to the Web Request Queue unless a request appears in another case where the address is not approved. Approving an address allows any future requests associated with the address to be passed by the Fraud Detection program. To identify a case as good, select **Approved Address** on the Vote-By-Mail Fraud Detection Case Details dialog.

Note that if you select **Approved Address** and then clear this check box, the disposition of individual requests in the case will be reset to the settings in the last saved version of the case.

Making a Case Inactive

A case can be made inactive, which releases the once questionable IP or email address so that future requests with the address will be passed by the Fraud Detection program. This allows for situations where an internet service provider dynamically assigns a previously questionable IP address to a new, presumably legitimate location.

If you inactivate a case—by selecting **Inactive Case** and clicking **Save** on the Vote By Mail Fraud Detection Case Details dialog—the disposition of any requests in the case is essentially frozen. Inactive cases do not appear on the Vote-By-Mail Fraud Detection Case List, so the case itself can no longer be viewed and the disposition of requests in the case cannot be changed, unless they happen to appear in other, still active, cases.

Fraud Detection Reports

- Active Cases in Vote-By-Mail Fraud Detection
- Approved Addresses in Vote-By-Mail Fraud Detection
- Blocked Requests in Vote-By-Mail Fraud Detection
- Inactive Cases in Vote-By-Mail Fraud Detection
- Questionable Web Requests for an Election

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Process Vote-By-Mail Requests Submitted Through Your Website

> **Note:** This feature is available only to counties that have either VR Tower or the Move Act Information Service and deploy the Mail Ballot Request Form web service on their website.

If your county allows voters to submit Vote-By-Mail requests on your website using the Mail Ballot Request Service web service, the information from these requests flows from the website to the Web Vote-By-Mail Request Queue. This eliminates the need to rekey the information from the request forms into voter records. All that's required is to check the web request and give Voter Focus the go-ahead to insert it into the voter's record.

> **Note:** The WebServicesJurisdictionClient.exe program must be running for voters to be able to use this service.

Only voters who can be validated as registered voters in your county will be allowed to make Vote-By-Mail requests on your website. The web service manages this by verifying the applicant's last name, first name, date of birth, and address against the local voter registration database.

> **Note:** Mail ballot requests that require the voter to complete an affidavit because they chose to have the mail ballot delivered to a new address that is not currently on file with FVRS do not appear in the Web Vote-By-Mail Request Queue in Voter Focus to prevent premature data entry.

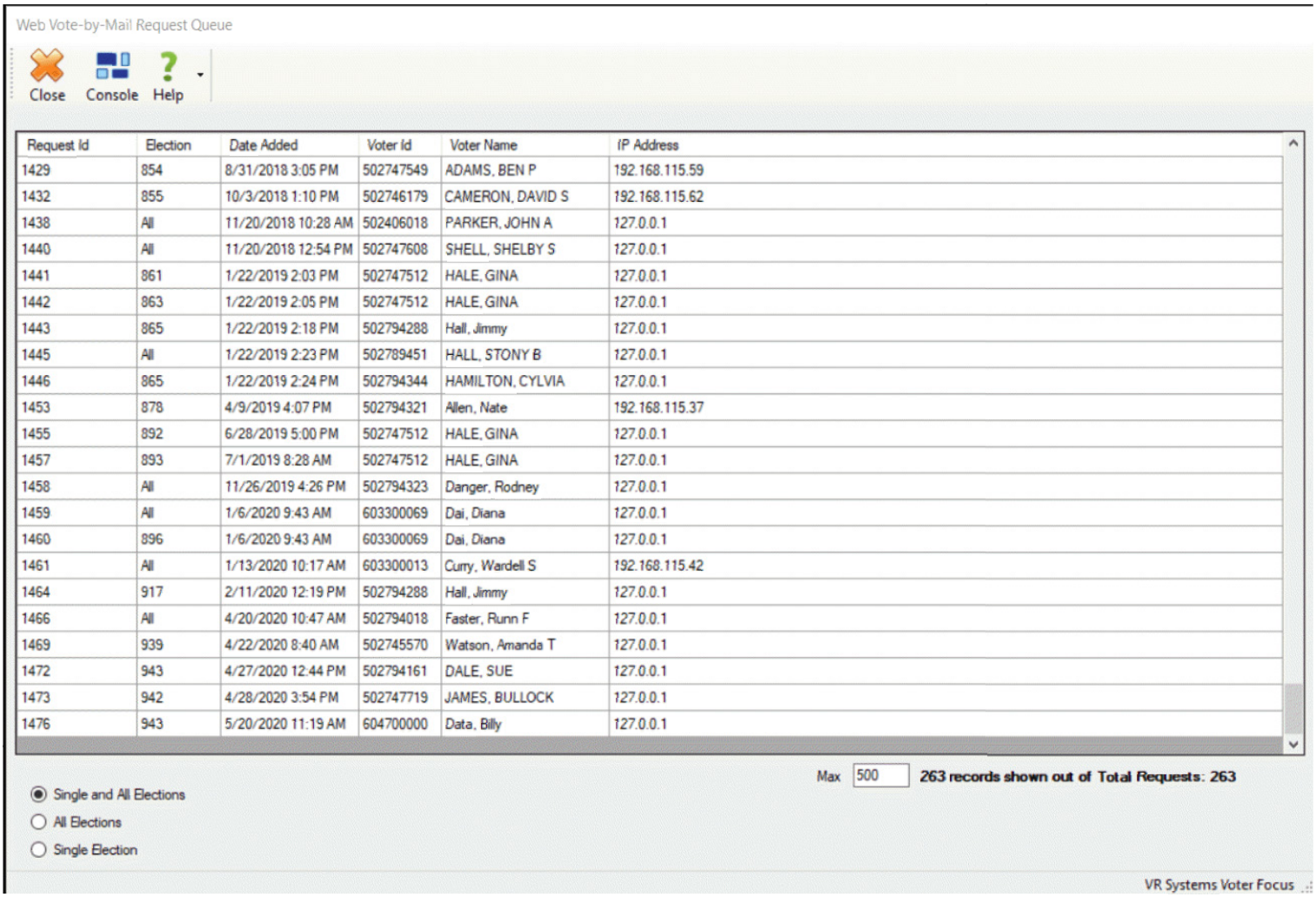
Your county will also receive an email for each voter who has submitted a Vote-By-Mail request online.

> **Note:** An email is not sent if the voter is required to complete an affidavit.

The email address submitted by the voter will be stored in the **E-Mail** field on the voter's **Vote-By-Mail** tab, replacing any previously entered email address. (These emails are not considered public record.)

For a list of the voters who have submitted web requests that have not yet been processed, run the Pending Web Absentee Requests report.

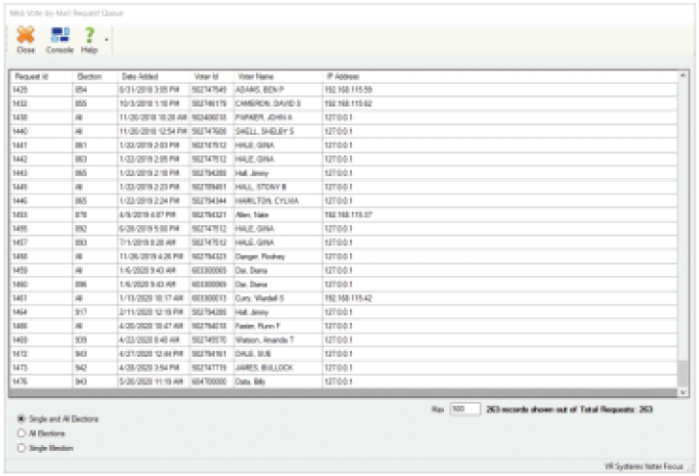
Processing a request from the website creates an entry on the voter's **Comms** tab called **Web Absentee Request**. Double-click this entry to see a summary of the request on the **View Web Absentee Request** dialog.


Web Vote-by-Mail Request Queue
Close
Console
Help
Request Id | Election | Date Added | Voter Id | Voter Name | IP Address
1429 | 854 | 8/31/2018 3:05 PM | 502747549 | ADAMS, BEN P | 192.168.115.59
1432 | 855 | 10/3/2018 1:10 PM | 502746179 | CAMERON, DAVID S | 192.168.115.62
1438 | All | 11/20/2018 10:28 AM | 502406018 | PARKER, JOHN A | 127.0.0.1
1440 | All | 11/20/2018 12:54 PM | 502747608 | SHELL, SHELBY S | 127.0.0.1
1441 | 861 | 1/22/2019 2:03 PM | 502747512 | HALE, GINA | 127.0.0.1
1442 | 863 | 1/22/2019 2:05 PM | 502747512 | HALE, GINA | 127.0.0.1
1443 | 865 | 1/22/2019 2:18 PM | 502794288 | Hall, Jimmy | 127.0.0.1
1445 | All | 1/22/2019 2:23 PM | 502789451 | HALL, STONY B | 127.0.0.1
1446 | 865 | 1/22/2019 2:24 PM | 502794344 | HAMILTON, CYLVIA | 127.0.0.1
1453 | 878 | 4/9/2019 4:07 PM | 502794321 | Allen, Nate | 192.168.115.37
1455 | 892 | 6/28/2019 5:00 PM | 502747512 | HALE, GINA | 127.0.0.1
1457 | 893 | 7/1/2019 8:28 AM | 502747512 | HALE, GINA | 127.0.0.1
1458 | All | 11/26/2019 4:26 PM | 502794323 | Danger, Rodney | 127.0.0.1
1459 | All | 1/6/2020 9:43 AM | 603300069 | Dai, Diana | 127.0.0.1
1460 | 896 | 1/6/2020 9:43 AM | 603300069 | Dai, Diana | 127.0.0.1
1461 | All | 1/13/2020 10:17 AM | 603300013 | Curry, Wardell S | 192.168.115.42
1464 | 917 | 2/11/2020 12:19 PM | 502794288 | Hall, Jimmy | 127.0.0.1
1466 | All | 4/20/2020 10:47 AM | 502794018 | Faster, Runn F | 127.0.0.1
1469 | 939 | 4/22/2020 8:40 AM | 502745570 | Watson, Amanda T | 127.0.0.1
1472 | 943 | 4/27/2020 12:44 PM | 502794161 | DALE, SUE | 127.0.0.1
1473 | 942 | 4/28/2020 3:54 PM | 502747719 | JAMES, BULLOCK | 127.0.0.1
1476 | 943 | 5/20/2020 11:19 AM | 604700000 | Data, Billy | 127.0.0.1
Max 500
263 records shown out of Total Requests: 263
Single and All Elections
All Elections
Single Election
VR Systems Voter Focus

Note: An entry is not made on the voter's Comms tab if the voter is required to complete an affidavit.

To process the Vote-By-Mail requests submitted on your website:

1. Go to **Vote By Mail > Process Web Requests** to open the Web Vote-by-Mail Request Queue. The requests that were submitted on your website and are awaiting processing are listed.



   Initially, the requests are ordered by when they were added to the queue (that is, the *Date Added* column) and respective of the filters at the bottom of the dialog.

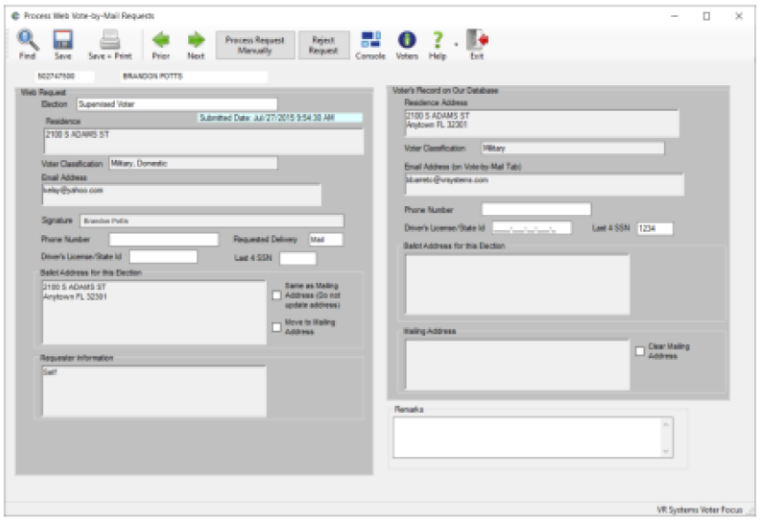
   Note: You can re-sort by a different column or change the sort order (ascending or descending) by clicking any column header.

2. You can do the following to limit the number of requests that display in the grid:
   - Select to display **Single and All Elections**, or limit the grid display to only **All Elections** or only **Single Election** requests.
   - Leave the default **Max** number to display in the queue, which is 500 requests, or change the selection.

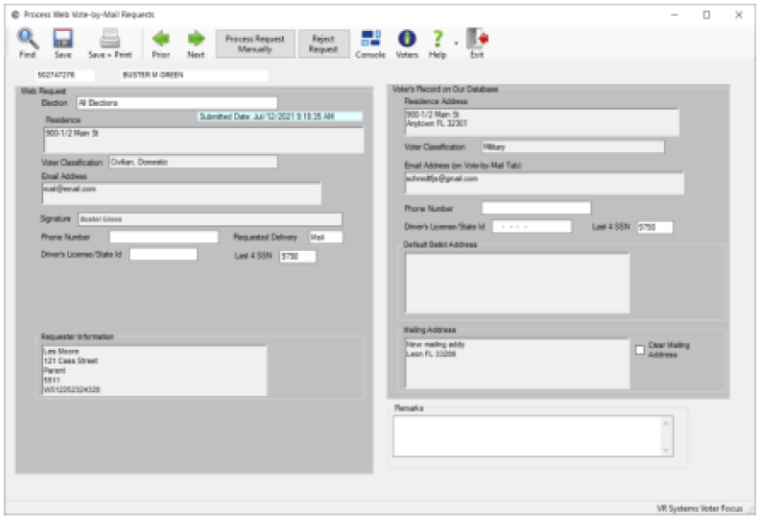
   Note:
   - Changing the Max setting to a significantly greater number may affect the system's response time to load and also re-load (after processing a request and returning to the grid) requests.
   - The system retains changes to the Max setting. The next time you return to the dialog, your last setting remains in effect.

3. Click an entry in the list to display the request in the Process Web Vote-By-Mail Requests dialog. The left pane displays the data submitted by the voter on the website form. Vote-By-Mail related data from the voter's record is shown in the right pane. The **Election** field in the **Web Request** pane indicates whether the request is for all elections or a specific election.

Process Web Vote-By-Mail Dialog for Single Election:



Process Web Vote-By-Mail Dialog for All-Elections:



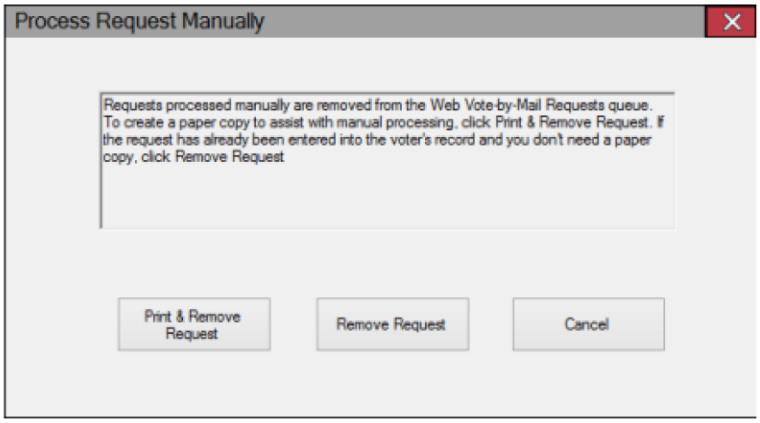
4. Review the information provided by the voter and compare it to the data from their record.
    - If the voter requested delivery of their ballot by email, they must provide an email address in the **Email Address** field as well as an address to show that they are a UOCAVA voter in the **UOCAVA Address Provided by Voter** field. You can pick up this address as their mailing address by selecting **Move to Mailing** address. (The **UOCAVA Address Provided by Voter** field won't appear if the voter did not provide this information on the online form.)
    - If the voter provided an address where the ballot is to be mailed for a single election only, it appears in **Ballot Address for this Election**. When you save the request, this address is copied to the **Ballot Address for this Election** field in the voter's record (Vote-By-Mail Address dialog), unless you select **Same as Mailing Address (Do not update address)**.
    - Use the **Remarks** box for any notes about the request, such as comments on the voter’s eligibility or the existence of previous requests for the election.
5. Take the appropriate action to process the request:
    - **If the request looks good,** click **Save** to process the request into the voter's record. Clicking **Save + Print** will save the request and print an Absentee Request Information Sheet to your Windows default printer. Information in the following fields of the web request is copied to the voter's record, overwriting any information in the record:

        - **Voter Classification**

- **Email Address**. Copied to the email address on the **Vote-By-Mail** tab, not the **Maint** tab.
- **Ballot Address for this Election**. (Single Election) Copied to Ballot Address for this Election, unless you selected *Same as Mailing Address (Do not update address)*.
- **Ballot Address for All Elections**. (All Elections) Overwrites the default ballot address. If your county does not use default ballot addresses, the address on the web request is stored with each election.

- **If the voter already has a request on file for this election,** you will see the message *Absentee Ballot Already Requested. Voter record must be used to update existing request or put on second and third request*. This means that the request cannot be processed through the web request feature as this feature only handles initial requests.

  Go to **VOTER REGISTRATION > Voter Maintenance** and take appropriate action in the voter's record to update the request or record a second/third request. Once the request has been handled manually, return to the request in the queue and click **Process Request Manually**.



  Do one of the following to remove the request from the queue and move to the next request:

  - To produce a hard copy of the voter's request before removing it from the queue, click **Print & Remove Request**.
  - To remove it from the queue with no printout, click **Remove Request**.

- **If you believe the request should be rejected,** type a reason for the rejection into the **Remarks** box. Some reasons—for example the voter's status is Ineligible or the voter cannot be found—are inserted automatically by Voter Focus. You can change this text or amend it, if you want. Then click **Reject Request** to remove the request from the web queue and go to the next voter's request.

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