

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 233 Muir Hill Dr., Aledo, TX 76008.
4. My declaration highlights substantial deviance from statistical norms and results regarding voting patterns in Wisconsin.
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 declaration.
6. Wisconsin has shown a steady decrease for support in Democratic presidential nominees since Barack Obama won the state by 13.91% in 2008. He won Wisconsin again in 2012, but only by a margin of 6.94%, and Republican Donald Trump won the state by 0.77% in 2016.
7. As part of an overall working-class voter shift, Wisconsin has moved in the same manner as Pennsylvania, 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 declaration.

8. The following counties have cast more Democratic presidential votes than cast for Obama in 2008, when he won the state by 13.91%:

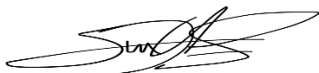
- a. Ozaukee – 26,515 Biden votes, a 31.5% increase from 2016, and 28.8% more than cast for Obama in 2008. President Trump has increased his vote share by 11.3%, receiving 33,912 votes. Democratic vote shifts were -6.9% in 2012 and +5.3% in 2016.
- b. Dane – 260,157 Biden votes, a 19.5% increase from 2016, and 26.3% more than cast for Obama in 2008. President Trump has increased his vote share by 10.5%, receiving 78,789 votes. Democratic vote shifts were +4.9% in 2012 and +0.8% in 2016. Dane County is home to the University of Wisconsin. President Obama had record support, turnout, and enthusiasm among college-age students and did not have to navigate pandemic-related challenges to turn out these voters, which makes Biden's total extremely suspicious.
- c. Waukesha – 103,867 Biden votes, a 31.1% increase from 2016, and 21.7% more than cast for Obama in 2008. President Trump has increased his vote share by 12.0%, receiving 159,633 votes. Democratic vote shifts were -7.7% in 2012 and +0.6% in 2016.
- d. St. Croix - 23,190 Biden votes, a 32.7% increase from 2016, and 9.5% more than cast for Obama in 2008. President Trump has increased his vote share by 22.8%, receiving 32,190 votes. Democratic vote shifts were -6.0% in 2012 and -12.2% in 2016,

making such a sharp Democratic turnabout in the face of a strong President Trump vote increase extremely suspect.

- e. Washington - 26,647 Biden votes, a 27.8% increase from 2016, and 3.6% more than cast for Obama in 2008. President Trump has increased his vote share by 16.4%, receiving 60,235 votes. Democratic vote shifts were -9.9% in 2012 and -10.0% in 2016. A rebound of 27.8% for Democrats from two consecutive cycles of heavy losses, particularly with President Trump reconsolidating the Republican Party base and lost third-party voters, seems unlikely.
 - f. Bayfield - 6,155 Biden votes, a 24.3% increase from 2016, and 3.1% more than cast for Obama in 2008. President Trump has increased his vote share by 12.0%, receiving 4,617 votes. Democratic vote shifts were +1.0% in 2012 and -18.9% in 2016.
9. Milwaukee County's voter rolls shrank from 2016 to 2020, after losing 13.1% of President Obama's Democratic vote total from 2012; however, this year, Milwaukee County has surged in Democratic votes to nearly equal Obama re-election levels with 317,251 votes, even as President Trump has made an increase of 6.6% in votes. With a declining voter roll, Milwaukee County was likely on track to cast less than 275,000 Democratic ballots this year. Combining these resurgent totals with the transparency issues experienced on the early morning hours of November 4, their current total of 317,251 is strikingly suspect.
10. *New York Times* live vote reporting shows a dump of 168,541 votes at 3:42:20 (a.m.) on November 4, 2020. Of those votes, 143,378

(85.07%) went for Biden, and just 25,163 (14.93%) went for Trump. This dump was enough to flip the race with almost no transparency to the viewing public. The live graph showing this vote dump (circled) is attached as Exhibit D to this document.

11. President Trump has vastly increased his vote share in the entirety of Wisconsin, and also in the rural parts of the state, including the counties he flipped from Democratic to Republican in 2016; however, against the trends of the previous election, the Democrats have increased at greater margins than Trump has, thereby erasing margin gain, and allowing for suspicious vote totals in Milwaukee, Dane, Ozaukee, Waukesha, St. Croix, and other counties with strikingly high Democratic vote totals to overwhelm Trump's totals. A county classification of Wisconsin is available in Exhibit B to this declaration, and a full analysis of Wisconsin's voter irregularities is available in Exhibit C.



Seth Keshel

17 Nov. 2020

Aledo, Texas

Improbable Voting Trend Reversals in Wisconsin

Seth Keshel, MBA

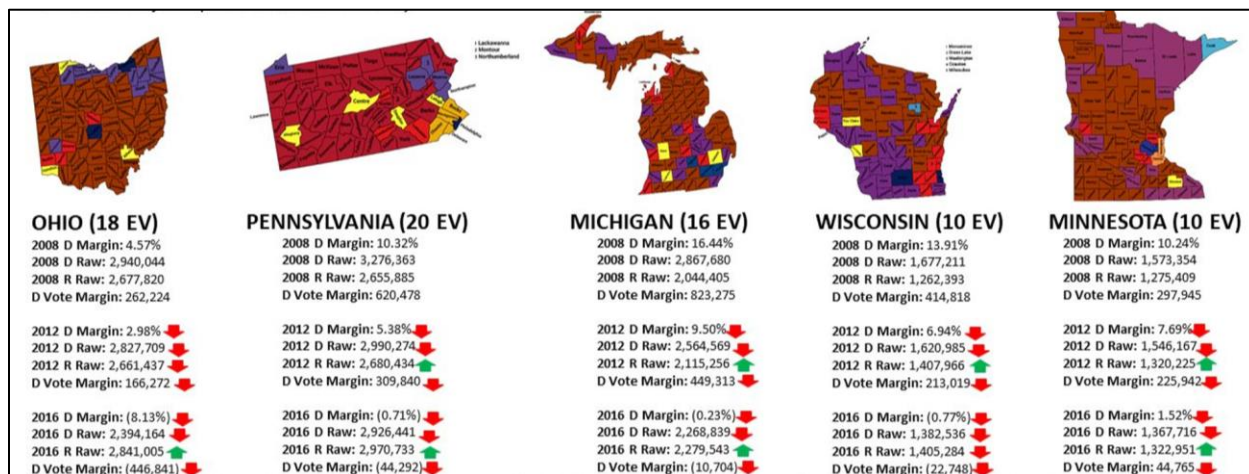
Executive Summary

Wisconsin is showing the same pattern of potential widespread fraud as observed in Pennsylvania, Michigan, Georgia, and North Carolina. While Milwaukee County is focal for transparency and observation violations, including reporting statistically impossible vote counts in the early morning hours away from scrutiny, Dane County has surged far past support totals for President Obama, despite expected difficulties mobilizing student voters to polls. President Trump has reconsolidated the Republican base in suburban Milwaukee and far surpassed his 2016 support levels but has been limited in margin growth by historically improbable Democratic support in these strongholds, which defy years of data in Wisconsin in which the Republican party surged as the Democratic Party plunged. Finally, in strong Trump counties showing a double inversion cycle (one party up, the other down), particularly in rural and exurban Wisconsin, Trump's totals are soaring, and against established trends, Biden's totals are at improbable levels of support despite lacking registration population growth.

The entire vote must be recanvassed and audited for both electronic vote fraud and mail/absentee fraud.

Opening

Since President Obama swept through the Midwest ("Rust Belt") region in 2008, winning Pennsylvania by 10 percent, Michigan by 16 percent, and Wisconsin by 14 percent, the Democratic Party has declined steadily in all successive Presidential elections in not only share of the vote, but in raw votes overall, without exception (pending the final results of the 2020 election). Pennsylvania is the only state mentioned in this paragraph which registers voters by party, and it has trended three percentage points in favor of Republicans since the 2016 election. The raw vote trends and results in these three states, plus Ohio and Minnesota, are pictured below.



These trends show the Democrats losing raw votes in every election since 2008, with the Republicans gaining in eight of 10 samples, and with the margins moving in favor of Republicans each time. This is a product of limited or stagnant population growth in these states, which given stable turnout numbers, means one party is typically going down if another is going up. In fast-growing states such as Florida, Texas, or Arizona, it should be expected for both parties to make substantial gains in a "horse race" scenario.

Wisconsin

President Obama's margin of victory in Wisconsin from 2008 fell from 13.91% to 6.94% in his reelection campaign, and that margin moved 7.71% toward Republicans in 2016 as the working-class communities that historically favored Democrats moved to support then-candidate Donald Trump. Declining voting power from these working class counties beginning and 2012, and then from Milwaukee County in 2016 was an instrumental part of this shift, as was the substantial movement of northern Wisconsin toward the Republican Party. President Trump was able to win Wisconsin in 2016 thanks to substantially decreased support for Democrats, and even overcame less than optimal support from the Republican strongholds of southeastern Wisconsin.

The consistent characteristic in the shift in Wisconsin's political landscape is the declining Democratic Party raw vote totals, and the increasing Republican totals. Thus far, according to the Decision Desk unofficial vote tally, President Trump is substantially adding to his vote totals in every Wisconsin County, while his opponent adds votes at a greater percentage, often in counties that have trended steadily away from Democrats since at least 2008. The following counties, which have mostly lost Democratic votes since 2008, have now contributed more Biden votes than Obama received in 2008, when he won the state by 13.91%. Green font represents growth in raw votes. Red font represents decrease in raw votes.

County	Rep '08	Dem '08	Rep '12	Dem '12	Rep '16	Dem '16	Rep '20	Dem '20	Dem Percentage of Obama 2008 Votes
Ozaukee	32,172	20,579	36,077	19,159	30,464	20,170	33,912	26,515	128.8%
% Increase	N/A	N/A	12.1%	(6.9%)	(15.6%)	5.3%	11.3%	31.5%	

Dane	73,065	205,984	83,644	216,071	71,275	217,697	78,789	260,157	126.3%
% Increase	N/A	N/A	14.5%	4.9%	(14.8%)	0.8%	10.5%	19.5%	

Waukesha	145,152	85,339	162,798	78,779	142,543	79,224	159,633	103,867	121.7%
% Increase	N/A	N/A	12.2%	(7.7%)	(12.4%)	0.6%	12.0%	31.1%	

Racine	45,954	53,408	49,347	53,008	46,681	42,641	54,475	50,154	117.6%
% Increase	N/A	N/A	7.4%	(0.7%)	(5.4%)	(19.6%)	16.7%	17.6%	

St. Croix	22,837	21,177	25,503	19,910	26,222	17,482	32,190	23,190	109.5%
% Increase	N/A	N/A	11.7%	(6.0%)	2.8%	(12.2%)	22.8%	32.7%	

Wash'ton	47,729	25,719	54,765	23,166	51,740	20,852	60,235	26,647	103.6%
% Increase	N/A	N/A	14.7%	(9.9%)	(5.5%)	(10.0%)	16.4%	27.8%	

Bayfield	3,365	5,972	3,603	6,033	4,124	4,953	4,617	6,155	103.1%
% Increase	N/A	N/A	7.1%	1.0%	14.5%	(18.9%)	12.0%	24.3%	

OTHER NOTABLE COUNTIES

County	Rep '08	Dem '08	Rep '12	Dem '12	Rep '16	Dem '16	Rep '20	Dem '20	Dem Percentage of Obama 2008 Votes
Milwaukee	149,445	319,819	154,924	332,438	126,069	288,822	134,355	317,251	99.2%
% Increase	N/A	N/A	3.7%	3.9%	(18.6%)	(13.1%)	6.6%	9.8%	

La Crosse	23,701	38,524	25,751	36,693	26,378	32,406	28,661	37,817	98.5%
% Increase	N/A	N/A	8.6%	(4.8%)	2.4%	(11.7%)	8.7%	16.7%	

Brown	55,854	67,269	64,836	62,526	67,210	53,382	75,865	65,509	97.4%
% Increase	N/A	N/A	16.1%	(7.1%)	3.7%	(14.6%)	12.9%	22.7%	

Eau Claire	20,959	33,146	23,256	30,666	23,331	27,340	25,339	31,617	95.6%
% Increase	N/A	N/A	11.0%	(7.5%)	0.3%	(10.8%)	8.6%	15.6%	

Outagamie	39,667	50,294	47,372	45,659	49,879	38,068	58,379	47,659	94.8%
% Increase	N/A	N/A	19.4%	(9.2%)	5.3%	(16.4%)	17.0%	25.2%	

Walworth	25,485	24,117	29,006	22,552	28,863	18,710	33,844	22,783	94.2%
% Increase	N/A	N/A	13.8%	(6.7%)	(0.5%)	(17.0%)	17.3%	21.8%	

Rock	27,364	50,529	30,517	49,219	31,493	39,339	37,133	46,649	92.3%
% Increase	N/A	N/A	11.5%	(2.6%)	3.2%	(20.1%)	17.9%	18.6%	

Kenosha	31,609	45,836	34,977	44,867	36,037	35,799	44,972	42,191	92.0%
% Increase	N/A	N/A	10.6%	(2.1%)	3.0%	(20.2%)	24.8%	17.9%	

Winnebago	37,946	48,167	42,122	45,449	43,445	37,047	47,795	44,060	91.5%
% Increase	N/A	N/A	11.0%	(5.6%)	3.1%	(18.5%)	10.0%	18.9%	

Sheboygan	30,801	30,395	34,072	27,918	32,514	23,000	37,624	27,109	89.2%
% Increase	N/A	N/A	10.6%	(8.1%)	(4.6%)	(17.6%)	15.7%	17.9%	

Fond D.L.	28,164	23,463	30,355	22,379	31,022	17,387	35,754	20,588	87.7%
% Increase	N/A	N/A	7.8%	(4.6%)	2.1%	(22.3%)	15.3%	18.4%	

Marathon	30,345	36,367	36,617	32,363	39,014	26,481	44,623	30,807	84.7%
% Increase	N/A	N/A	20.7%	(11.0%)	6.5%	(18.2%)	14.4%	16.3%	

Findings

The most suspicious counties are those that showed two consecutive elections trending upward for the Republican candidate and downward for the Democratic candidate. These show a similar pattern to counties in Pennsylvania trending heavily Republican in registration, with a significant increase for President Trump in raw votes in 2020, but a smaller than expected margin due to an unexpected sharp reversal of votes for Biden in counties showing inverse trends for parties in recent elections. The only counties not showing two consecutive cycles of decline for Democrats are Waukesha, Bayfield, and Milwaukee. Wisconsin had several Republican counties in 2016 with fewer votes for Trump and higher third-party vote shares (hence 2,682 fewer votes for Trump than Romney), but based on 2020 returns to this point, that has been overcome in every single county.

Dane County is clearly associated with a major university, with student turnout thought to be reaching record lows due to campus shutdowns and lack of mobilization. This county is over 2008 Obama levels by 26.3% (54,173 votes), when that candidate drew record support from young voters, and up 19.5% since 2016, after two consecutive elections of sparse growth in Democrat votes. This county is one of few counties Obama overperformed in for his reelection, and 2020's total is still 20.4% over that number. The same mathematical improbability given the circumstances of 2020 was also seen in Washtenaw County, Michigan (home county of the University of Michigan). Dane County should be audited and recanvassed significantly, particularly for mail and absentee ballot fraud.

Trump slightly underperformed Romney's 2012 vote totals statewide because he lagged in total votes from suburban counties Waukesha, Racine, Washington, Ozaukee, and Walworth. This year, he has reconsolidated the Republican base and improved at a minimum of 11.3% (Ozaukee) in raw votes in these counties, and at a high of 17.3% (Walworth). President Trump has grown his share of raw votes in Wisconsin by a minimum of 4.1% (Menominee) in all counties, and at a high of 24.8% (Kenosha).

Among the largest counties in the state, the largest spikes in growth since 2016 by the Democratic candidate came in St. Croix (32.7%), Ozaukee (31.5%), Waukesha (31.1%), Washington (27.7%), placing them ahead of President Obama's total of votes in those counties in 2008, a year in

which he won the state by 13.91%. This could be feasible if the inverse pattern of “one party up, one party down” were present, suggesting the transfer of voters from one party to the next, but President Trump has also greatly overperformed his 2016 vote totals and does not exhibit the collapse in support seen by Democrats in 2012 and 2016, especially in known Republican strongholds. While it is plausible that Democrats should add votes in those counties based on observed party registration trends in the Philadelphia area, it is unfathomable that those counties would overperform their 2008 Obama vote numbers by such margins, while still adding substantial increases in raw votes to President Trump in 2020.

Despite ranking 67th in the state in percentage increase in voter registrations, Milwaukee County increased its share of Democratic votes by 9.8%, even as President Trump increased by 6.6% while supposedly securing a higher share of minority votes than any Republican since 1960. Biden’s total is nearly equal to Obama’s 2008 performance and reverses a massive loss of Democratic votes in 2016 in a post-Obama environment, despite a decreasing voter roll (more than 3% decrease in registrations since 2016). Strangely, Milwaukee’s turnout dwarfs other regional counterparts like Cleveland, Gary, and Indianapolis. This county is reported to have had many flagrant abuses of transparency regulations and is also known to have reported results without observation in the early morning hours of November 4, 2020, which was just enough to overcome a once formidable lead in the state by President Trump. The best course of action in Milwaukee is to recanvass and audit every mail-in and absentee ballot for massive fraud. The trend in Cleveland, Detroit, Milwaukee, and Philadelphia recently has suggested decreasing vote totals from one election to the next and is supported by the aforementioned significant decrease in the voter rolls in Milwaukee. This year’s reported vote totals necessitate and improbable turnout level and suggest illegality in reporting and mail balloting.

All counties showing two consecutive cycles of inverse party trend (Republican up twice, Democrat down twice), with Democrats substantially up this year, may be subject to counting errors, or “glitches,” like those reported in Antrim County, Michigan, or even recently in Rock County, Wisconsin. These voting machines and their associated software should be audited and examined by coding professionals, especially if the recent newsworthy events regarding corrupted voting software are widespread. It is highly possible that tampered or corrupted software in known Trump strongholds may be responsible for reducing margins of raw vote victory in counties that have massively left the Democratic Party since 2008.

The entire vote in Wisconsin is suspect against recent trends and should be subject to recanvass and audit, not just a recount of hundreds of thousands of illegal ballots. It appears that the major case in the state is that in spite of substantially growing his vote share in strong-Trump counties, and surging in votes in urban and suburban counties, Trump’s margin is substantially limited, even after two consecutive inverse party trends. In urban or suburban areas, Democratic vote share is soaring to record numbers, even over Obama’s totals after a 13.91% win, all while Trump surges in votes in those counties as well. Urban areas have issues with transparency and should be fully audited for mail and absentee fraud.