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PETITION FOR A RECOUNT

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I, Jill Stein, a candidate for the office of the President of the United States in an election held on November 8, 2016, petition the Board of State Canvassers for a recount of the votes cast for this office. The undersigned members of my slate of electors join me in this Petition.

I and the undersigned members of my slate of electors, individually and collectively, are aggrieved on account of fraud or mistake in the canvass of the votes by the inspectors of election, and/or the returns made by the inspectors, and/or by the Board of County Canvassers, and/or by the Board of State Canvassers. The bases for this assertion, include, but are not limited to, the following allegations:

- i. Michigan relies solely on optical scan machines for voting. These machines are susceptible to compromise and to commit errors. For the last decade, computer scientists have warned about the vulnerabilities of these machines, including that they can be breached without detection and even after certain security measures are put in place.
- ii. Apart from risk of tampering with the machines, the optical scan technology used uniformly throughout the state is prone to errors, including a tendency to miss or misread markings made by voters.
- iii. Upon information and belief, in Michigan, there is evidence of voting irregularities in the 2016 presidential election that indicate potential malfunctioning of the technology used to read and tabulate votes. For example, the vote count indicates a high number of “under-votes”—ballots cast for which no presidential vote was counted.
- iv. In addition, there is strong evidence that hackers have had both the opportunity and the motive to breach the security of Michigan’s voting technology. In August 2016, it was widely reported that hackers breached voter registration databases in at least two states and stole hundreds of thousands of voter records.

- v. Around that time, hackers infiltrated the e-mail systems of the Democratic National Committee and a campaign official for Democratic presidential candidate Hillary Clinton. These e-mails were then published online.
- vi. On October 7, 2016, the Department of Homeland Security (DHS) and the Office of the Director of National Intelligence on Election Security issued a joint statement regarding these breaches. The statement reads, in pertinent part, as follows: “The U.S. Intelligence Community (USIC) is confident” that there have been “recent compromises of e-mails from US persons and institutions, including from US political organizations.” It also states that “[t]hese thefts and disclosures are intended to interfere with the US election process” and that “similar tactics and techniques [have been used] across Europe and Eurasia . . . to influence public opinion there.” In the statement, DHS urges state election officials “to be vigilant and seek cybersecurity assistance” from that agency in preparation for the presidential election.
- vii. The well-documented and conclusive evidence of hackers’ interference in the presidential race before the election, along with the irregularities observed in Michigan and the vulnerabilities of optical scan machines, call into question the results and indicate the possibility of fraud or mistake in the results.
- viii. A hand count of all paper ballots without relying on optical scan machines is necessary to make a determination as to whether fraud or mistake occurred. Without utilizing this method, a recount would not exclude the possibility of a breach that resulted in a miscounting of votes.

I have attached various Exhibits, which are incorporated fully herein, that further detail the basis for the statements set forth above.

I request that all of the precincts and absent voter counting board (AVCB) precincts within the State of Michigan be recounted by hand count. A list of those precincts is attached as Exhibit 1.

My deposit of \$125 per precinct is enclosed.

Signature: \_\_\_\_\_  
Petitioner Jill Stein

Subscribed and sworn to before me this  
\_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_  
\_\_\_\_\_  
*(Signature of Notary Public)*

Name of Notary: \_\_\_\_\_  
County: \_\_\_\_\_  
Commission Expires: \_\_\_\_\_

I, \_\_\_\_\_, an elector for Jill Stein, join in this Petition for a Recount in the State of Michigan and state that the matters contained in the above petition are known to me to be true except for those allegations stated on information and belief, which I believe to be true.

Signature: \_\_\_\_\_

Subscribed and sworn to before me this  
\_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_

*(Signature of Notary Public)*

Name of Notary: \_\_\_\_\_

County: \_\_\_\_\_

Commission Expires: \_\_\_\_\_