

1 Shana D. Weir
WEIR LAW GROUP, LLC
2 Nevada Bar No. 9468
6220 Stevenson Way
3 Las Vegas, Nevada 89120
(702) 509-4567
4 Email: sweir@weirlawgroup.com
Attorneys for the Contestants

5
6 Jesse R. Binnall (*pro hac vice* application forthcoming)
HARVEY & BINNALL, PLLC
7 717 King Street, Suite 200
Alexandria, Virginia 22314
(703) 888-1943
8 (703) 888-1930 (facsimile)
Email: jbinnall@harveybinnall.com
9 Attorneys for the Contestants

10
11 **IN THE FIRST JUDICIAL DISTRICT COURT
CARSON CITY, NEVADA**

12 Jesse Law, an individual; Michael
McDonald; an individual; James
13 DeGraffenreid III, an individual;
Durward James Hindle III, an
14 individual; Eileen Rice, an individual;
Shawn Meehan, an individual, as
15 candidates for presidential electors on
behalf of Donald J. Trump,

16 Contestants,

17 vs.

18 Judith Whitmer, an individual; Sarah
Mahler, an individual; Joseph
19 Throneberry, an individual; Artemesia
Blanco, an individual; Gabrielle D'Ayr,
20 an individual; and Yvanna Cancela, an
21 individual, as candidates for
presidential electors on behalf of Joseph
22 R. Biden, Jr.,

23 Defendants.

Case No. 20 OC 00163 1B

Dept. 1

**CONTESTANTS' DESIGNATION OF
EXPERT WITNESS – JESSE KAMZOL**

24
25 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

26 COME NOW Jesse Law, Michael McDonald, James DeGraffenreid III,
27 Durward James Hindle III, Eileen Rice, and Shawn Meehan as candidates for
28 presidential electors on behalf of Donald J. Trump (collectively "Contestants"), by and

1 through their attorneys of record Shana D. Weir, Esq. and Jesse R. Binnall, Esq. (*pro*
2 *hac vice* application forthcoming), and hereby designate the following expert witness,
3 pursuant to NRCPC 16.1(a)(2), and the Order of this Court dated November 24, 2020:


4 1. Jesse Kamzol

5 Jesse Kamzol is a data science and analysis expert. A copy of his curriculum
6 vitae and report are attached hereto. His hourly rate is \$300. Mr. Kamzol will give
7 expert testimony regarding his analysis of multiple voter and commercial databases.
8 He will also opine regarding voter registration, demographics, vote count, and other
9 data including but not limited to: data regarding voters with addresses that are out of
10 state, nonexistent addresses, voters where ID would be required, nonresidential
11 addresses, undeliverable mail, USPS change of address form data, deceased voters,
12 voters with the same name, and past voting history data. He will also testify
13 regarding inconsistencies between Nevada vote reporting systems. His conclusions
14 will demonstrate fraudulent and improper voting in Nevada in an amount exceeding
15 the candidates' vote differences in the 2020 presidential general election.
16
17

18 Contestants reserve the right to call any and all experts designated by any
19 other party as its own expert witness(es). Contestants further reserve the right to
20 supplement its list of expert witnesses as discovery continues. Contestants further
21 reserve the right to add, delete or change expert witnesses as may be necessary for
22 preparation for trial, or to offer any other expert's opinions for impeachment purposes.
23
24
25
26
27
28

1 Dated: this 30th day of November, 2020 WEIR LAW GROUP, LLC


2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BY: 
SHANA D. WEIR, ESQ. SBN 9468
6220 Stevenson Way
Las Vegas, Nevada 89120
(702) 509-4567
Email: sweir@weirlawgroup.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **CONTESTANTS' DESIGNATION OF EXPERT WITNESS, JESSE KAMZOL** was submitted for filing and/or service with the First Judicial District Court on the 30th day of November, 2020. Service of the foregoing documents was made by electronic mail addressed to:

Bradley S. Schrage, Esq.
Daniel Bravo, Esq.
Email: bschrager@wrslawyers.com
Email: dbravo@wrslawyers.com
Attorneys for Defendants



An Employee of Shana D. Weir

Report of Jesse Kamzol

I have specialized in data management and data science analysis for over 15 years including as the Republican National Committee Chief Data Officer, most recently in 2017. I currently have my own consulting firm where I perform data analysis for campaigns, political action committees, grassroots organizations, and technology firms.

My findings herein result from my analysis of publicly available database information. All my conclusions given in this case are regarding the 2020 presidential general election and are my opinion and are stated to a reasonable degree of statistical certainty. My findings are as follows.

I reviewed over 2 million records from various databases including: Nevada city/county/jurisdiction files, the Nevada state voter files, the Nevada Election Day voter files, vote by mail/absentee vote files from the state and jurisdictions, early voting files, consumer data files, and USPS change of address files, as referenced below. These are all publicly or commercially available data files.

One very important note is all this data does not include provisional vote data from the 2020 general election which I have so far been denied access to dispositional data and which would be valuable to make further conclusions. However, even only using 2020 general election voting data, I was able to identify 130,709 unique cases across the universes listed in the table below which showed multiple levels of illegal ballots cast. For example:

Non-Nevada Mailing Address:

Utilizing an enhanced statewide Nevada Voter File that included: mailing addresses as provided by the counties/jurisdictions, USPS National Change of Address ("NCOA") information, COA processing from September, a November 5th download of Clark County Voter File's mailing address information available for online download on the Clark County Elections Department website, a November 10th download of Washoe Elections AB/EV file's mailing address available on Washoe County Elections Department website, and a 48 month NCOA file provided to the Nevada GOP from October 2020, I queried the data by the mailing state from the address provided from the jurisdiction. After subtracting out-of-state military and college student records, I identified 19,218 Nevada voters with a non-Nevada mailing address, 15,164 of whom cast their ballots by mail/absentee.

Non-existent Addresses:

I reviewed the Washoe County and Clark County voter database files and found 8,111 voters who voted in Nevada but whose registered addresses are physically non-existent, as in, these are vacant lots, apartment numbers that do not exist, and house address numbers that do not exist.

I found 8,111 voters who did not have a Nevada mailing address meeting the postal requirements of a zip+4 location. Of those, 3,262 voted in Nevada by mail, and 4,849 voted in person.

Using CASS (Coding Accuracy Support System) standard marketing software, and utilizing standard address hygiene processing, primarily CASS (Coding Accuracy Support System) marketing software, I was able to identify voters that voted from addresses that the US Postal Service deems mail not reaching its intended recipient because the address is: incorrect, incomplete, illegible, or undeliverable.

4,287 people registered to vote at a non-existent Nevada address voted by mail in Nevada. I believe the correct universe may be larger than what I reviewed given the fact that Clark County refuses to produce its complete list of addresses where ballots were mailed this election cycle.

USPS Flags on Non-Residential Addresses:

I identified 15,681 Nevada voters who are registered to vote at either a commercial address or a vacant property.

8,842 Nevada voters were registered at a commercial (non-residential) address. 5,101 of those returned their ballots by mail and voted.

USPS Flags on Vacant Addresses:

6,873 voters were registered to vote at addresses the USPS has flagged as vacant, meaning these addresses have been identified as vacant for more than 90 days by postal carriers. 3,463 people ostensibly at those vacant addresses returned and voted mail ballots.

In my opinion, ballots should never have been mailed or delivered to these vacant addresses in the first place, as mailing ballots to commercial and vacant properties creates an easily exploitable opportunity for ballot stuffing and voter fraud. In fact, I would never recommend mailing anything addressed or targeted to any particular individual to a commercial or vacant address, because for commercial marketing mail it would be a complete waste of resources, and for personally identifiable mail it would invite mail and identity theft.

National Change of Address Out of State:

I have identified 2,468 voters who filled out a USPS National Change of Address Form with the United States Postal Service, legally changing their address to another jurisdiction or state or country. All of the 2,468 voter address changes took place before the 30-day Nevada voter residency requirement and therefore were not residents of Nevada 30 days before the general election.

In my opinion Nevada should have purged the 2,468 voter records and not mailed those ballots. Additionally, I know from experience that this type of mail should be flagged at the postal office and returned to county elections divisions instead of ever going out for delivery. To avoid this problem election officials could have mailed those voters a verification card to make sure the voter's intent to change residency to another state.

Deceased Voters:

1,506 Nevada voters who voted by mail in the 2020 general election were also listed as deceased by the Social Security Administration (SSA) Master Death File, Consumer Data Vendors, Public Obituary Data Matches, and Credit Bureau Deceased Data.

Duplicate Voter Registrations:

I identified 42,284 voters who appear to have voted twice in the 2020 general election. This list includes individuals that have the same name, address, and birthdate, and that voted multiple times. All these voters had multiple voter registration numbers associated with substantially the same name, birthdate, and address. There are a few variations within this list because of first name deviations, i.e. Bill and

William, but all 42,284 voters have multiple data point matches including birthdates from which I conclude with a reasonable degree of certainty that these duplicate voters are each one and the same individual.

LIST OF REFERENCED DATA SOURCES

- Nevada Secretary of State Statewide Eligible Voter List Full Unabridged Database Dump:
<https://www.nvsos.gov/SOSServices/DataDownload/CreateEditReport1.aspx>

- Clark County Elections Countywide Registered Voter List, All Voters
https://www.clarkcountynv.gov/government/departments/elections/ports_data_maps/voter_list_data_files.php

- Clark County Elections Absentee Voter List
https://www.clarkcountynv.gov/government/departments/elections/ports_data_maps/mail_absentee_ballot_data.php

- Clark County Elections Early Voter List
https://www.clarkcountynv.gov/government/departments/elections/ports_data_maps/early_voting_turnout_data.php

- Clark County Elections Election Day Voter List:
https://www.clarkcountynv.gov/government/departments/elections/past_elections.php

- Washoe County Elections Election Day Turnout List:
https://www.washoecounty.us/voters/elections/20_gen_ab_ed_reports.php

- Washoe County Elections AB/EV Turnout Report:
https://www.washoecounty.us/voters/elections/20_gen_ab_ev_reports.php

- Carson City Absentee, Early, and Election Day Voter Lists, sourced from County Elections Division

- Douglas County Absentee, Early, and Election Day Voter Lists, sourced from County Elections Division

- Mail Ballot Voter Lists, in whole or part, from Churchill, Elko, Humboldt, Lander, Lincoln, Lyon, Nye, Pershing, and Storey counties as SoS file's mail ballot data was inaccurate for every jurisdiction except Clark County by 34% or greater as of 11/6.
- An enhanced statewide voter file, current as of September 2020 provided from the NV GOP.

END OF REPORT



Recoverable Signature

X 

Jesse Kamzol

Signed by: 3465c35f-7d77-42a2-a19a-92980d08d922

- Education:** **University of Michigan Bachelor of Arts** **Ann Arbor, Michigan**
Economics and Political Science April 2007
- Experience:** **Limbik** **NY,NY**
Head of Data August 2018 to Present
- Managed AWS architecture of a library of over 8,500,000 videos
 - Built analytical models based on features of the video library assisting with recommendations of features
 - Built client relationships with a number of fortune 500 companies to advise on marketing strategies using data
- Genus AI** **London, UK**
VP of Data August 2017 to August 2018
- Oversaw the development of over 25 political and commercial clients
 - Assisted in building a machine-learning engine to enable clients to take advantage of data resources
 - Maintained a robust data warehouse infrastructure of roughly 6 petabytes of data
- Republican National Committee-Digital and Data** **Washington, DC**
Chief Data Officer March 2015 to August 2017
- Managed over 300 terabytes of production data and over 3.8 petabytes of in-house data
 - Ensured a large team of software engineers and product designers were held accountable to deadlines of product development
 - Routinely had to account for a fast paced environment, whether it be a sitting politician, committee member or a major donor
- Republican National Committee-Digital and Data** **Washington, DC**
Deputy Chief Data Officer January 2014 to March 2015
- Integral part of designing and deploying the RNC data platform using a range of technologies to handle a big data infrastructure
 - Manage a large team of various technology backgrounds including but not limited to GIS, structured data, unstructured data, engineers and web developers
 - Dealt with a very unique situation of bringing together engineers and political data in a fast paced demanding environment, creating complex business rules and adhering to strict deadlines
- Republican National Committee-Strategy Division** **Washington, DC**
Deputy Director April 2012 to January 2014
- Oversaw the RNC's list development, election data and mapping departments in order to provide streamlined internal operations
 - Coordinated with state parties and various campaigns assisting with voter targeting, contact universe structures and general campaign consulting
- Republican National Committee-Strategy Division** **Washington, DC**
Director of List Development May 2010 to April 2012
- Conducted regular research on voting trends, voter contact programs and voter turnout for elections nationwide used in coordination with the RNC get out the vote program
 - Routinely engaged in data mining and regression analysis with consumer and demographic information in order to assist in all aspects of campaigns ranging from the national to the local level
- Republican National Committee-Strategy Division** **Washington, DC**
Voter Registration Coordinator/Election Data Analyst May 2008 to May 2010
- Tracked and analyzed national voter registration data in order to make recommendations on improving registration in our weaker areas and to combat opposition registration margins
 - Regularly coordinated data enhancement with various projects including but not limited to polling, micro-targeting, and RNC Voter Vault

Kessler and Associates, Inc.

Legislative Assistant

Washington, DC

June 2007 to May 2008

- Tracked national and state legislation relevant to our clients' interests in order to keep them informed
- Drafted weekly bill summaries and status reports in order to create an encompassing analysis for our clients
- Assisted in shaping strategic messages to present to Members of Congress and their staff informing them of issues that pertained to our clients and their constituents

Skills/Other: Training in Microsoft SQL, FoxPro, Power BI, Visual Basic, SPSS, Microsoft Office, SASS, AWS, Bluemix, Azure, Hadoop, NEO4j, Cypher, Redshift, MySQL, Testified in front of NH state senate committee in 2017 John Doe v. Jane Smith - Deposition, Fall 2017 in regards to age data provided to tobacco companies, Testified in front of the Judiciary committee of the United States House of Representatives in 2015 in regards to voter data integrity John Doe v. Jane Smith - Deposition, Fall 2015.