

**THE COURT OF COMMON PLEAS
FRANKLIN COUNTY, OHIO**

OHIO DEMOCRATIC PARTY, ET AL.,

Case No: 20 CV 4997

Plaintiffs,

v.

Judge: Stephen L. McIntosh

**FRANK LAROSE, IN HIS OFFICIAL
CAPACITY AS OHIO SECRETARY OF STATE,**

Defendant.

**MOTION FOR LEAVE TO FILE
BRIEF OF AMICI CURIAE ELECTION CYBERSECURITY EXPERTS
AND VOTING RIGHTS ORGANIZATIONS
IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION
AND TO FILE AN EXTENDED MEMORANDUM**

Proposed amici Dr. Dan Wallach, Dr. Juan E. Gilbert, Dr. J. Alex Halderman, Dr. Poorvi L. Vora, Dr. Edward W. Felten, Dr. Douglas Jones, Dr. Ronald Rivest, and Dr. Matt Blaze (together, the “Cybersecurity *Amici*”), in conjunction with proposed amici The Brennan Center for Justice at New York University School of Law (“the Brennan Center”), the American Civil Liberties Union of Ohio Foundation (“ACLU of Ohio”), and Northeast Ohio Voter Advocates (“NOVA”) (the Brennan Center, the ACLU of Ohio, and NOVA together are the “Voting Rights Organization *Amici*”), move for leave to file the attached proposed amicus curiae brief. In support of this motion, the *Amici* state as follows:

1. Cybersecurity *Amici* are a group of leading election security experts who have advanced the security and integrity of election systems nationwide. Election officials regularly rely on their research and knowledge to identify and address vulnerabilities in voting machines, registration databases, and other election infrastructure. In response to challenges brought on by

the novel coronavirus (“COVID-19”) pandemic, *Amici* believe that election administration changes can be made to increase accessibility without compromising security.

2. Dr. Dan Wallach serves as Professor of Computer Science and of Electrical and Computer Engineering and a Rice Scholar at the Baker Institute for Public Policy at Rice University. He served as the director of an NSF-funded multi-institution research center, ACCURATE (A Center for Correct, Usable, Reliable, Auditable, and Transparent Elections), from 2005-2011. Dr. Wallach is the recipient of the 2013 Microsoft SEIF Faculty Research Award, served as a member of the Air Force Science Advisory Board from 2011-2015, and the USENIX Association Board of Directors from 2011-2013.

3. Dr. Juan E. Gilbert is the Andrew Banks Family Preeminence Endowed Professor and Chair of the Computer & Information Science & Engineering Department at the University of Florida where he leads the Human Experience Research Lab. He is also an ACM Fellow, a Fellow of the American Association of the Advancement of Science, a Fellow of the National Academy of Inventors, and a Senior Member of the IEEE. Dr. Gilbert is the inventor of Prime III, an open source, secure and accessible voting technology that was recently used in statewide elections in New Hampshire and in Butler County, Ohio. Dr. Gilbert was a member of the National Academies Committee on the Future of Voting: Accessible, Reliable, Verifiable Technology that produced the report titled, "Securing the Vote: Protecting American Democracy". Dr. Gilbert is originally from Ohio, having grown up in Hamilton, where his family still resides. He is also a graduate of Miami University and the University of Cincinnati.

4. Dr. J. Alex Halderman is a Professor of Computer Science & Engineering and the Director of the Center for Computer Security and Society at the University of Michigan. He is the 2020 recipient of the University of Michigan’s President’s Award for National and State

Leadership, a 2019 Andrew Carnegie Fellow, and was named one of Popular Science's "Brilliant 10" in 2015. Dr. Halderman is a co-founder and Board Member of the Internet Security Research Group (ISRG) and serves on the Verified Voting Foundation's Board of Advisors. He is also the co-chair of the Michigan Secretary of State's Election Security Advisory Commission.

5. Dr. Poorvi L. Vora serves as Professor of Computer Science at George Washington University. Dr. Vora was a Faculty Computer Scientist for the National Institute of Standards and Technology's Security Technology Group from 2008-2011 and former Associate Editor for the *IEEE Transactions on Information Forensics and Security*. She currently serves on the Verified Voting Foundation's Board of Advisors.

6. Dr. Edward W. Felten is the Robert E. Kahn Professor of Computer Science and Public Affairs at Princeton University, and a member of the United States Privacy and Civil Liberties Oversight Board. He previously served as Deputy United States Chief Technology Officer, and as Chief Technologist at the Federal Trade Commission. He was elected to the National Academy of Engineering in 2013 and was selected an ACM Fellow in 2007.

7. Dr. Douglas Jones serves as Associate Professor of Computer Science at the University of Iowa. He was appointed to the Iowa Board of Examiners for Voting Machines and Electronic Voting Systems in 1994, and served for a decade, including a term as chair. Dr. Jones was one of four technical and scientific experts to the U.S. Election Assistance Commission's Technical Guidelines Development Committee from 2009 to 2012. He is co-author with Barbara Simons of the book *Broken Ballots*. He was also a technical consultant for the 2006 Emmy-nominated HBO documentary film, *Hacking Democracy*.

8. Dr. Ronald Rivest serves as Institute Professor at the Massachusetts Institute of Technology (MIT). He is a member of MIT's Computer Science and Artificial Intelligence

Laboratory (CSAIL), a member of the lab's Theory of Computation group, and a founder of its Cryptography and Information Security Group. Dr. Rivest is also a founder of RSA Data Security and a co-founder of Verisign and of Peppercoin. He is an ACM Fellow, an IEEE member, and was named to the National Inventors Hall of Fame in 2018. He currently serves on the Board of the Verified Voting Foundation.

9. Dr. Matt Blaze is the McDevitt Professor of Law and Computer Science and Law and Chair of the Department of Computer Science at Georgetown University. He is a recipient of the EEF Pioneer Award, a co-founder of Def Con Voting Village, and an inventor of *Trust Management*, which provides the abstract layer in which a system decides whether to allow some potentially dangerous action. Dr. Blaze was also a designer of *swIPe*, a predecessor of the now standard IPSEC protocol for protecting Internet traffic.

10. Voting Rights Organization *Amici* are nonprofit organizations who have worked to advance accessible, safe, and secure elections nationwide and in Ohio, with the goal of ensuring that every eligible voter has the opportunity to cast a ballot and have that ballot counted.

11. The Brennan Center is a nonprofit, nonpartisan public policy and law institute that seeks to improve systems of democracy and justice. The Brennan Center advocates for election administration reforms, litigates voting rights cases, and conducts empirical and qualitative research on issues related to election law and administration. Through its Election Reform Program, the Brennan Center has engaged in extensive efforts to ensure that elections throughout the country this year are accessible, safe, and secure given the difficult and unprecedented challenges created by COVID-19. The Brennan Center has worked for many years with local organizations in Ohio to advocate for election reforms throughout the State.

12. The ACLU of Ohio is the Ohio affiliate of the national American Civil Liberties Union, one of the oldest and largest groups in the nation dedicated to preserving and defending civil rights and liberties. The ACLU of Ohio is a non-profit, non-partisan membership organization, with over 100,000 members and supporters in Ohio alone. For nearly 100 years, the ACLU of Ohio, and the national affiliate, have litigated questions involving civil liberties in the state and federal courts, helping to establish literally dozens of precedents that today form part of the basic framework of our constitutional jurisprudence. The issues relating to voting rights implicated by this case are among the core issues on which the Amicus represents its members and constituencies and the reason the ACLU of Ohio appears in this case.

13. NOVA is a grassroots organization that believes in expanding voter participation so that all voices are heard in our democracy. NOVA works to enable and expand turnout in under-represented areas of Northeast Ohio and to improve the election process in Ohio through research and advocacy for legislative and administrative changes.

14. *Amici* recognize Defendant's commitment to promoting secure and accessible elections in Ohio, but believe the security concerns he raises can be addressed while still affording Ohio voters the ability to submit absentee ballot applications by email. In particular, Secretary LaRose's brief raises two core security concerns: ransomware attacks and network overloads (intentional or otherwise). As set forth in the attached proposed amicus brief, *Amici* write to suggest simple and low-cost – or even free – means of addressing these concerns.

15. Careful consideration of these security issues is critical given the difficult and unprecedented challenges created by COVID-19. Where simple and practical solutions exist, security concerns should not dictate the outcome of this case. *Amici* respectfully ask the Court to grant leave to file an amicus brief addressing these important issues.

16. Local Rule 12.03 permits parties to seek leave to file reply briefs in excess of the typical seven page limit. In light of the significance of these issues, the *Amici* ask the Court for leave to exceed the seven-page limit, specifically to file a reply brief of up to thirteen pages in length.

WHEREFORE, *Amici* respectfully request that the Court grant their request to participate as amici curiae, permit filing of a reply brief of up to 13 pages, and accept the attached proposed brief for filing *instanter*.

Respectfully submitted,

/s/ Scott R. Lesser

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Dated: August 14, 2020

Attorneys for Proposed Amicus Curiae

The Brennan Center for Justice

CERTIFICATE OF SERVICE

The undersigned certifies that on the 14th day of August 2020, a copy of this *Motion for Leave to File Brief Amicus Curiae of Election Cybersecurity Experts and Voting Rights Organizations in Support of Plaintiff's Motion for Preliminary Injunction and to File an Extended Memorandum* was electronically filed with the Clerk of Courts, and sent via email, to the following:

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Respectfully submitted,

/s/ Scott R. Lesser

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PROPOSED

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INTEREST OF AMICUS CURIAE

Amici are leading cybersecurity experts and nonprofit voting rights organizations who have advanced the security, integrity, and accessibility of election systems nationwide and in Ohio, with the goal of ensuring that every eligible voter has the opportunity to cast a ballot and have that ballot accurately counted. Election officials regularly rely on their research and knowledge to identify and address vulnerabilities in voting machines, registration databases, and other election infrastructure. In response to challenges brought on by the COVID-19 pandemic, *Amici* believe that election administration changes can be made to increase accessibility without compromising security.

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¹ This brief does not purport to convey the position, if any, of the New York University School of Law.

jurisprudence. The issues relating to voting rights implicated by this case are among the core issues on which the Amicus represents its members and constituencies and the reason the ACLU of Ohio appears in this case.

Northeast Ohio Voter Advocates (“NOVA”) is a grassroots organization that believes in expanding voter participation so that all voices are heard in our democracy. NOVA works to enable and expand turnout in under-represented areas of Northeast Ohio and to improve the election process in Ohio through research and advocacy for legislative and administrative changes.

SUMMARY OF ARGUMENT

Amici come before the Court in support of Plaintiffs’ motion for a preliminary injunction. *Amici* recognize Defendant’s commitment to promoting secure and accessible elections in Ohio. However, they must respectfully disagree with his refusal to afford the vast majority of Ohio voters any means for the electronic submission of absentee ballot applications. *Amici* write to briefly address two points.

First, the COVID-19 pandemic has created an urgent need for effective absentee voting options. Current projections estimate that almost three quarters of Ohio voters will vote absentee in the upcoming general election. Particularly in light of recent Postal Service disruptions that have caused significant delays in mail service, having some means to electronically transmit applications to vote absentee is critical to ensuring that none of these voters are disenfranchised.

Second, election officials can easily facilitate electronic submission of applications at little cost while minimizing associated security risks. Ideally this should be done through a secure online portal, but it is also feasible to do so using email. In his brief, Secretary LaRose raises two core security concerns: ransomware attacks and network overloads (intentional or

otherwise). The former can be addressed by simply establishing a dedicated email address that is only accessed via a computer isolated from other election infrastructure to prevent the spread of malware. The latter can be addressed by using low-cost or free services that will redistribute traffic, adjusting email settings, and taking other simple mitigation steps. With these measures in place, the benefits of allowing electronic submission of absentee applications clearly outweigh any security risks.

ARGUMENT

I. Online submission of absentee ballot applications is critical in the face of COVID-19 and postal delays.

The COVID-19 pandemic has made widely available absentee voting indispensable to ensuring that all voters have the opportunity to cast a ballot. In its guidance on election day polling places, the Center for Disease Control and Prevention (CDC) warns that “[t]he more an individual interacts with others, and the longer that interaction, the higher the risk of COVID-19 spread.”² While some voters will still choose to vote in-person this November, many others, especially individuals with a heightened risk for severe illness, will face disenfranchisement without access to remote voting options.

In the face of these challenges, voters are choosing to vote absentee in unprecedented numbers this year.³ During the April primary in Ohio, 85 percent of all votes cast were absentee.⁴ And experts expect this trend to continue in November; a recent model based on historical data

² *Considerations for Election Polling Locations*, Center for Disease Control and Prevention (June 22, 2020), <https://www.cdc.gov/coronavirus/2019-ncov/community/election-polling-locations.html>.

³ Nathaniel Rakich, *There Have Been 38 Statewide Elections During the Pandemic. Here’s How They Went.*, FiveThirtyEight (Aug. 3, 2020), <https://fivethirtyeight.com/features/there-have-been-38-statewide-elections-during-the-pandemic-heres-how-they-went/>.

⁴ Pia Deshpande, *Ohio’s 2020 Presidential Primary*, Healthy Elections (July 27, 2020), [https://healthyelections.org/sites/default/files/2020-08/Ohio%20Election%20Memo\(1\).pdf](https://healthyelections.org/sites/default/files/2020-08/Ohio%20Election%20Memo(1).pdf).

and a survey of Ohio voters projected that 71 percent of likely voters intend to vote absentee for the general election.⁵ Secretary LaRose predicted that the November general election will have “not only the highest turnout election in [the] state’s history, but also the highest percentage of vote by mail ballots [the state has] ever seen.”⁶

Exacerbating these already challenging circumstances, the United States Postal Service (USPS) is currently experiencing a budgetary crisis that has resulted in serious delivery delays and other service disruptions.⁷ Under current rules, Ohio voters who wish to vote absentee must submit a request to do so either in person (raising many of the same concerns that in-person voting raises) or by mail.⁸ In the week before the April primary election, however, Secretary LaRose expressed concern that “[a]s Ohioans rush to submit their vote-by-mail requests, and [county] boards work overtime to fulfill them, we are finding that the delivery of the mail is taking far longer than what is published by the United States Postal Service (USPS) as expected delivery times.”⁹ Secretary LaRose explained that first-class mail was taking “as long as 7–9 days” for delivery, rather than the expected “1–3 days.”¹⁰ In May, the USPS noted similar delays

⁵ *Citizen Projects Higher Levels of Vote by Mail in Key States*, Citizen Data (Aug. 6, 2020), <https://citizendata.com/news/citizen-projects-higher-levels-of-vote-by-mail-in-key-states/>.

⁶ Clare Roth, *Ohio Secretary of State Expects Record Voter Turnout for November Election*, WOSU (June 17, 2020), <https://radio.wosu.org/post/ohio-secretary-state-expects-record-voter-turnout-november-election#stream/0>.

⁷ Jacob Bogage, *Postal Service Memos Detail ‘Difficult’ Changes Including Slower Mail Delivery*, Washington Post (July 14, 2020), <https://www.washingtonpost.com/business/2020/07/14/postal-service-trump-dejoy-delay-mail/>.

⁸ Ohio Secretary of State Directive 2020-13.

⁹ Letter from Ohio Secretary of State Frank LaRose Re: Conflicting Information from the USPS Related to Election Mail (Apr. 23, 2020), <https://www.ohiosos.gov/globalassets/media-center/news/2020/2020-04-24.pdf>.

¹⁰ *Id.*

nationwide in a letter to state and local election officials, and warned that officials and voters should allow at least one week for delivery of absentee applications and mail ballots.¹¹

The absentee voting process relies on a series of deliveries between election officials and voters, all of which must be completed before election day. A postal disruption resulting in late delivery of an absentee ballot request can set off a chain reaction leading to disenfranchisement. Online submission of absentee ballot applications eases this process. Voters do not need to spend time and money going out to purchase stamps. Applications do not need to spend up to a week or more in the mail system before they reach county election offices for processing. And ballots ultimately get to voters faster, leaving more time for return before election day.

II. Ohio can allow voters to submit absentee applications by email without compromising security.

Secretary LaRose is right to ask how the state can securely accept absentee applications by email. Fortunately, there are well-established best practices and industry standards that election officials can apply to do so. *Amici* agree, as the Secretary has noted elsewhere, that the best approach would be to establish a secure online portal for submitting applications.¹² Critically, however, it is also possible to design a system for email submission that minimizes overall security risks.

In his brief, the Secretary raises two core security concerns with allowing voters to submit applications by email: ransomware attacks and network overloads, intentional or

¹¹ Letter from United States Postal Service Re: Election Mail (May 29, 2020), <https://about.usps.com/newsroom/national-releases/2020/2020-05-29-marshall-to-election-officials-re-election-mail.pdf>.

¹² Rick Rouan, *Could Ohio Develop Online Absentee Ballot Requests in Time for November Election?*, Columbus Dispatch (June 10, 2020), <https://www.dispatch.com/news/20200610/could-ohio-develop-online-absentee-ballot-requests-in-time-for-november-election>.

otherwise. *See* Combined Memorandum in Opposition to Plaintiffs’ Motion for Preliminary Injunction and Motion to Dismiss Plaintiffs’ Amended Complaint, at 15-18.

Ransomware Attacks: Secretary LaRose is correct that the biggest security threat associated with electronic submission of applications is that the process will be used as a conduit for malware, including ransomware, to infect other election infrastructure systems. But election officials can take steps to both decrease the likelihood of opening a malicious email attachment and mitigate the damage that can occur if such an attachment is opened.

The most important step is to use a dedicated email address for the sole purpose of receiving absentee applications. The dedicated email address should be accessed from one or more isolated, dedicated computers or laptops with virus scanning software installed to help detect suspicious attachments and make it less likely that an election worker opens a malicious email attachment. These computers should also have security controls that restrict access to the broader network, with all printing from one of these computers done on a printer that is directly connected to the computer. By isolating the email account from other critical networks, election officials can reduce the risk of hackers gaining access to the entire election system even if an election worker inadvertently opens an infected attachment.

Network Overload, Intentional or Otherwise: The Secretary is also correct to be concerned about network overloads, including intentional Distributed Denial of Service (DDoS) attacks¹³ and inadvertent overloads caused by a high volume of requests. But these problems also have easy, cost-effective solutions.

¹³ Distributed Denial of Service (DDoS) attacks occur when a malicious actor inundates a system with traffic in order to overwhelm the system and render it unusable. *See* Cybersecurity & Infrastructure Security Agency, *Understanding Denial-of-Service Attacks* (last revised Nov. 20, 2019), <https://us-cert.cisa.gov/ncas/tips/ST04-015>.

First, election officials can mitigate the risk of DDoS attacks or inadvertent overloads using services that redistribute traffic that would otherwise overwhelm the system and render it unusable. Such services are widely available and even offered for free by some of the top vendors.¹⁴

Election officials can also take steps to ensure that email systems are prepared for the surge in absentee applications that will occur in the months before the general election. Most email servers have a default setting that caps the amount of email that can be received and may prevent applications from being processed in a timely manner. Some servers also block large attachments or filter emails with attachments into spam folders. But election officials can — and should — revise these settings to ensure that every voter’s application reaches the office for processing.

To further mitigate any potential confusion, officials should also have a policy of sending confirmations to let voters know when their application has been received and processed. This will provide confidence to voters and decrease the likelihood that duplicate applications are submitted. If a voter does not receive a confirmation, they can notify their election office and officials can determine whether a system issue is preventing applications from getting through. And if a voter receives a confirmation for a request that he or she did not initiate, the voter can notify officials for further investigation.¹⁵

¹⁴ Cloudflare, one of the top providers of DDoS mitigation services, offers these services to state and local election officials for free. *Project Athenian*, Cloudflare, <https://www.cloudflare.com/athenian/guide/#start>.

¹⁵ It is true that current technology does not allow for the secure electronic submission of actual absentee *ballots*, but the same considerations do not apply to absentee applications. Unlike ballots, the information on applications is not secret. Both the voter and the election worker recipient have access to the information in the application and can confirm the accuracy of all information submitted. If there is an issue with the application, election officials can contact the voter who submitted it and provide them with an opportunity to complete or correct the

CONCLUSION

Electronic submission of absentee ballot applications is common across the United States. As Secretary LaRose himself has noted, “[i]t just does not meet expectations in the year 2020 to require people to print a form and to put a wet ink signature on a dead tree piece of paper to fold it up, root through their junk drawer to find a stamp and mail it to their board of elections.”¹⁶ At least 28 states permit voters to submit an absentee ballot application online by email and/or a dedicated online portal.¹⁷ The experiences of these states show that, with proper precautions,

information. And because they are not entitled to secrecy, absentee applications can easily be tracked by voters from submission to acceptance.

¹⁶ Darrel Rowland & Rick Rouan, *After a Problem-Plagued Primary, Ohio Leaders Disagree about November Election Plan*, Columbus Dispatch (Apr. 28, 2020), <https://www.dispatch.com/news/20200428/after-problem-plagued-primary-ohio-leaders-disagree-about-november-election-plan>.

¹⁷ Alaska, Arizona, Arkansas, Delaware, Florida, Georgia, Idaho, Illinois, Indiana, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Nebraska, New Mexico, North Carolina, North Dakota, Oklahoma, Pennsylvania, Tennessee, Texas, Virginia, West Virginia, Wisconsin, and Wyoming. Nineteen of these states allow voters statewide to submit an application through an online portal. Brennan Center for Justice, *Preparing Your State for an Election Under Pandemic Conditions* (last updated Aug. 4, 2020), <https://www.brennancenter.org/our-work/research-reports/preparing-your-state-election-under-pandemic-conditions>. Twenty-three of these states allow voters to submit applications by email. Alaska Division of Elections, *By-Mail Ballot Delivery*, <https://www.elections.alaska.gov/Core/votingbymail.php>; Arizona Secretary of State, *Voting by Mail: How to Get a Ballot-by-Mail*, <https://azsos.gov/votebymail>; Arkansas Secretary of State, *How to Complete the Absentee Ballot Application*, https://www.sos.arkansas.gov/uploads/elections/How_to_Complete_the_Absentee_Ballot_Application.pdf; Delaware Department of Elections, *Request for an Absentee Ballot for Primary, General and/or Special Elections*, https://elections.delaware.gov/pubs/pdfs/absentee_ballot_application.pdf; Florida Division of Elections, *Vote-by-Mail*, <https://dos.myflorida.com/elections/for-voters/voting/vote-by-mail/>; Georgia Secretary of State, *Absentee Voting in Georgia*, https://sos.ga.gov/index.php/Elections/absentee_voting_in_georgia; Illinois State Board of Elections, *Application for Vote by Mail Ballot*, <https://elections.il.gov/Downloads/VotingAndRegistrationSystems/PDF/AbsenteeVoting/ClarkAbsentee2020GeneralElection.pdf?T=637328236655368728>; Indiana Secretary of State, *Absentee Voting*, <https://www.in.gov/sos/elections/2402.htm>; Maryland State Board of Elections, *Vote by Mail*,

election officials do not have to choose between accessibility and security in their absentee application process. Avoiding such a false choice is more important now than ever.

For the foregoing reasons and those set forth by the Plaintiffs, the Court should grant Plaintiffs' motion for preliminary injunction, and permit voters to submit completed applications by email with proper security measures in place.

https://elections.maryland.gov/voting/documents/Absentee_Ballot_Application_English.pdf; Massachusetts Secretary of the Commonwealth, *Absentee Voting*, <https://www.sec.state.ma.us/ele/eleabsentee/absidx.htm>; Michigan Secretary of State, *Obtaining an Absent Voter Ballot*, https://www.michigan.gov/sos/0,4670,7-127-1633_8716_8728-21037--,00.html; Minnesota Secretary of State, *Vote Early by Mail*, <https://www.sos.state.mn.us/elections-voting/other-ways-to-vote/vote-early-by-mail/>; Missouri Secretary of State, *Absentee Voting*, <https://www.sos.mo.gov/elections/goVoteMissouri/howtovote#Absentee>; Nebraska Secretary of State, *Early Voting*, <https://sos.nebraska.gov/elections/early-voting-0>; New Mexico Secretary of State, *Absentee Ballot Application*, <https://portal.sos.state.nm.us/OVR/WebPages/AbsenteeApplication.aspx?type=RA&AspxAutoDetectCookieSupport=1>; North Carolina State Board of Elections, *Requesting an Absentee Ballot*, <https://www.ncsbe.gov/Voting-Options/Absentee-Voting#RequestingAbsenteeBallot>; North Dakota State Board of Elections, *2020 State Absentee Ballot Request Form*, <https://s3.amazonaws.com/dl.ncsbe.gov/Forms/NCAbsenteeBallotRequestForm.pdf>; Oklahoma State Election Board, *Absentee Ballot Application Information*, <https://www.ok.gov/elections/documents/Oklahoma%20Absentee%20Ballot%20Application%20-%20fillable.pdf>; Tennessee Secretary of State, *Absentee Voting*, <https://sos.tn.gov/products/elections/absentee-voting#3>; Texas Secretary of State, *Application for Ballot by Mail*, <https://webservices.sos.state.tx.us/forms/5-15f.pdf>; Virginia Department of Elections, *Absentee and Early Voting*, <https://www.elections.virginia.gov/casting-a-ballot/absentee-voting/index.html>; West Virginia Secretary of State, *2020 General Election Absentee Ballot Application*, <https://sos.wv.gov/elections/Pages/AbsenteeApplication.aspx>; Wyoming Secretary of State, *Absentee Voting in Wyoming*, <https://sos.wyo.gov/elections/state/absenteevoting.aspx>.

Respectfully submitted,

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