

DISTRICT COURT, MESA COUNTY, COLORADO 125 N. Spruce St. Grand Junction, CO 81501	DATE FILED: August 30, 2021 9:54 AM FILING ID: D0CD553B54A77 CASE NUMBER: 2021CV30214
<p>Petitioners: JENA GRISWOLD, in her official capacity as Colorado Secretary of State; HEIDI JEANNE HESS, in her capacity as a Mesa County registered elector,</p> <p>v.</p> <p>Respondents: TINA M. PETERS, in her official capacity as the Clerk and Recorder for Mesa County, Colorado; BELINDA KNISLEY, in her official capacity as the Deputy Clerk and Recorder for Mesa County, Colorado.</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p><i>Attorneys for Petitioner Jena Griswold:</i> PHILIP J. WEISER, Attorney General LEEANN MORRILL, First Assistant Attorney General* MICHAEL KOTLARCYK, Assistant Attorney General* Ralph L. Carr Colorado Judicial Center 1300 Broadway, 6th Floor Denver, CO 80203 Telephone: (720) 508-6159/6187 E-Mail: leeann.morrill@coag.gov; michael.kotlarczyk@coag.gov Registration Numbers: 38742/43250 *Counsel of Record</p> <p><i>Attorney for Petitioner Heidi Jeanne Hess:</i> ERIC H. MAXFIELD Eric Maxfield Law, LLC 3223 Arapahoe Avenue, #300 Boulder, CO 80303 Telephone: (303) 502-7849 Email: eric@ericmaxfieldlaw.com Registration Number: 29485</p>	<p>Case No.</p> <p>Div:</p>
<p style="text-align: center;">VERIFIED PETITION FOR RELIEF UNDER C.R.S. § 1-1-113</p>	

INTRODUCTION

1. The Uniform Election Code of 1992, C.R.S. §1-1-101, *et seq.*, C.R.S. (2021) (“Election Code” or “Code”), authorizes the Secretary of State to certify electronic and electromechanical voting systems, which are used to cast, record, and tabulate votes cast in

Colorado elections, if they are compliant with standards and conditions of use imposed by state and federal law and, once certified, requires that such systems be maintained securely by County Clerks and Recorders who serve as their custodians.

2. Respondents Tina M. Peters, the Clerk and Recorder for Mesa County, and Belinda Knisley, the Deputy Clerk and Recorder for Mesa County, allowed an unauthorized individual to participate in the secure process for installing an update to the County's electronic voting system, leading to the public disclosure of State-guarded passwords needed to access the equipment. It appears that the passwords were then used by an as-yet unknown person or persons to access the equipment. The criminal investigations into this unprecedented security breach are now ongoing.

3. Colorado's electorate cannot wait for the final resolution of these investigations and any criminal charges that may ultimately be filed. Counties are now preparing for the November 2, 2021 coordinated statewide election, and Mesa County's participation in that election must be conducted by a chief designated election official who is able to perform the duties required by the Election Code.

4. Secretary of State Jena Griswold, who supervises the conduct of all coordinated elections when statewide ballot issues are on the ballot in Colorado under C.R.S. §§ 1-7.5-104 and 1-1-107(1)(a), and Heidi Jeanne Hess, a Mesa County registered elector, bring this action to ensure that Mesa County's upcoming election will be conducted in full compliance with the Election Code, as well as any applicable rules promulgated and orders issued by the Secretary thereunder.

5. Petitioners therefore respectfully request the Court determine that Respondents Peters and Knisley are absent and/or unable to perform their duties under the Election Code and appoint Wayne Williams—former Colorado Secretary of State and former El Paso County Clerk and Recorder—to serve as the chief designated election official for the November 2021 coordinated election in Mesa County and Sheila Reiner—the former Mesa County Clerk and Recorder—to serve as the Elections Supervisor for the November 2021 coordinated election in Mesa County.

PARTIES

6. Petitioner Jena Griswold is the duly elected Colorado Secretary of State. The Secretary of State is an elected constitutional officer and is Colorado's chief state election official. COLO. CONST. art. IV, § 1; C.R.S. §§ 1-1-107(1)(e).

7. Petitioner Heidi Jeanne Hess resides in, and is a registered elector of, Mesa County, Colorado.

8. Respondent Tina M. Peters is the duly elected Clerk and Recorder for Mesa County, Colorado. Her office is located at 200 S. Spruce St., Grand Junction, CO 81501, within Mesa County, Colorado. Respondent Peters is the chief designated election official for all coordinated elections in Mesa County under C.R.S. § 1-1-110(3).

9. Respondent Belinda Knisley is the duly appointed Deputy Clerk and Recorder for Mesa County, Colorado. C.R.S. § 30-10-403. Her office is located at 200 S. Spruce St., Grand Junction, CO 81501, within Mesa County, Colorado. Respondent Knisley is a would-be successor to Respondent Peters as the chief designated election official for all coordinated elections in Mesa County under C.R.S. § 1-1-110(2).

10. The Secretary and Respondents are “election officials” charged with duties and functions under the Election Code. *See, e.g.*, C.R.S. §§ 1-1-104(10), 1-1-107, 1-1-110, 1-5-616, -617, -621, and -623, and 1-7.5-104.

VENUE AND JURISDICTION

11. This Court has jurisdiction over the subject matter of this action pursuant to C.R.S. §§ 1-1-113(1) and 1-1-107(2)(d), or alternatively under C.R.C.P. 57.

12. Venue is proper in this Court under Rule 98(b)(2) and C.R.S. § 1-1-107(2)(d).

FACTUAL ALLEGATIONS

Coordinated Elections and Electronic Voting Systems

13. A “coordinated election” is “an election where more than one political subdivision with overlapping boundaries or the same electors holds an election on the same day and the eligible electors are all registered electors, and the county clerk and recorder is the coordinated election official for the political subdivisions.” C.R.S. § 1-1-104(6.5).

14. Coordinated elections often include statewide ballot issue elections that must be coordinated pursuant to COLO. CONST. art. X, § 20(3), which are commonly referred to as Taxpayer Bill of Rights or TABOR elections. C.R.S. § 1-1-104(2.3)

15. Upon information and belief, the November 2, 2021 coordinated election will include at least one statewide ballot issue election.

16. Coordinated elections when statewide ballot issues are on the ballot are supervised and conducted at two levels. First, the Secretary of State is the chief state election official (C.R.S. § 1-1-107(1)(e)) and, among other things, is responsible for:

- a. promulgating rules and conditions of use establishing minimum standards for electronic voting systems used in Colorado elections, C.R.S. §§ 1-5-616(1) and (3);
- b. issuing orders in furtherance of those rules and Election Code provisions governing electronic voting systems, C.R.S. §§ 1-1-110(1), 1-5-618(5), and 1-6-621(4);
- c. certifying electronic voting systems provided that they are compliant with federal and state standards, C.R.S. §§ 1-5-608.5(3), 1-5-615, 1-5-617(1);
- d. approving the purchase, installation, and use of a certified electronic voting system by any designated election official of a political subdivision that plans to use the system;
- e. providing technical assistance to designated election officials on issues related to the certification of the purchase, installation, and use of electronic voting systems by a political subdivision, C.R.S. § 1-5-617(6);
- f. supervising the conduct of all statewide ballot issue elections in Colorado, C.R.S. § 1-1-107(1)(a); and
- g. supervising all coordinated elections conducted by the County Clerks and Recorders, C.R.S. § 1-7.5-104.

17. Second, as the chief election official for the County, the County Clerk and Recorder serves as the chief designated election official and is responsible for conducting all coordinated elections. C.R.S. § 1-1-110(3). If a County Clerk and Recorder is absent or for any reason is unable to perform the required duties under the Election Code, all powers and authority granted to the County Clerk and Recorder by the Election Code may be exercised by a Deputy Clerk. C.R.S. § 1-1-110(2).

18. In carrying out their duties and functions under the Election Code, including specifically conducting coordinated elections, County Clerks and Recorders must follow the rules, conditions of use, and orders promulgated by the Secretary of State pursuant to the Code. C.R.S. §§ 1-1-110(1), 1-7.5-104.

19. The collaboration between the Secretary of State and Colorado's sixty-four County Clerks and Recorders has been tremendously successful and has built an election administration process that is a national model. In 2020, nearly 3.3 million votes were cast, for a turnout of 86.53% of active voters and with timely and accurate counting of those votes.

20. A "voting system" is "a process of casting, recording, and tabulating votes using electromechanical or electronic devices or ballot cards and includes, but is not limited to, the

procedures for casting and processing votes and the operating manuals, hardware, firmware, printouts, and software necessary to operate the voting system.” C.R.S. § 1-1-104(50.8).

21. Votes may be cast, registered, scanned, and tabulated in all elections held in Colorado by means of an electromechanical or electronic voting system. C.R.S. § 1-5-601(1).

22. The governing body of any political subdivision may, after consultation with the designated election official, adopt an electromechanical or electronic voting system for use at polling locations to record, and tabulate votes cast at all elections held by the political subdivision provided that the system has been and remains certified by the Secretary of State. C.R.S. §§ 1-5-612, 1-5-623.

23. A governing body of a political subdivision that adopts an electromechanical or electronic voting system for use at elections must pay for the purchase or lease of such voting system with County funds. C.R.S. § 1-5-603.

24. The County Clerk and Recorder is the custodian of the voting system in a political subdivision and may appoint deputies necessary to prepare and supervise the voting system before and during elections. C.R.S. § 1-5-605.5.

25. Due to the integral role voting systems serve in conducting elections, access to “voting equipment”—which “means electronic or electromechanical voting systems, electronic voting devices, and electronic vote-tabulating equipment, as well as materials, parts, or other equipment necessary for the operation and maintenance of such systems, devices, or equipment,” C.R.S. § 1-1-104(50.7)—is strictly limited by Colorado law, including the Secretary of State’s Elections Rules. *See* 8 CCR 1505-1, Election Rules 20.3 (requiring chain-of-custody evidence be maintained); 20.4 (requiring use of physical locks and seals); 20.5 (restricting access to secure areas to certain employees who have passed background checks); 20.6 (limiting users who have electronic access to voting equipment); 20.9 (requiring video surveillance of voting equipment at certain times); *see also* C.R.S. §§ 1-5-607(1) (prohibiting elected officials from preparing, maintaining, or repairing voting equipment); 1-5-616(5) (requiring designated election official to establish their own security plans for their equipment, subject to approval by the Secretary of State).

26. As an important security measure, Colorado’s voting systems are prohibited from being connected to the Internet. *See* Election Rule 20.19.1. As a result, updates to the software on voting equipment must be done manually and in person. These manual, in-person updates are essential to maintaining the security of voting systems.

27. This process is called a “trusted build.” A software build is a process where source code is converted to machine readable instructions for the voting system. A trusted build is a software build performed with security measures intended to ensure that the software installed on the machine is exactly the software created by the voting system provider and approved by the Department of State.

28. The Department of State conducts the trusted build installation process and limits participation to designated staff of the Colorado Department of State, the County Clerk and Recorder's Office, and the voting system provider. These select individuals are present to ensure the trusted build securely and faithfully creates the necessary code in the voting system equipment, and must pass background checks to be present.

The May 25, 2021 Trusted Build and the Security Breaches

29. A trusted build was scheduled in Mesa County for May 25, 2021 to install software on Mesa County's voting equipment called Democracy Suite version 5.13.

30. To ensure the security of the process, County Clerks and Recorders must ensure that only authorized employees, who have passed background checks, are allowed access to a trusted build. *See* Election Rule 20.5.4. Clerk Peters requested to have third-party observers present for the trusted build. The Department of State denied that request.

31. Sometime before the May 25 trusted build, the video surveillance in the Mesa County Clerk's Office was turned off. It was not fully restored until August 2021. This act was outside of the normal business practice of Mesa County, which routinely maintains 24 hours surveillance in these areas.

32. Upon information and belief, on the evening of Sunday May 23, 2021, a copy was made of the voting equipment hard drive, which included copying the voting system software and other files stored on the hard drive. Security logs indicate that Respondent Peters accessed the area where the voting system is located throughout the day and into the night when it is believed the copy was taken. On information and belief, Respondent Peters allowed others to gain access to the voting system equipment on this date, with the security logs reflecting that Gerald Wood, a non-employee of Mesa County, had also entered the elections division area.

33. The trusted build occurred as scheduled on May 25, 2021. One employee from the Department of State, three employees from the voting system manufacturer, one employee of the Mesa County Clerk and Recorder's Office (Sandra Brown) and the non-employee Gerald Wood, as well as Respondent Peters were present for the trusted build.

34. Respondent Knisley informed the Department of State that Gerald Wood was an employee of her office. In fact, Wood was not and never has been a Mesa County employee. Upon information and belief, Respondent's misrepresentation of Wood's status to the Department of State was done with the knowledge of Respondent Peters.

35. Upon information and belief, Respondent Knisley and Sandra Brown facilitated the improper presence of the individual identified as Gerald Wood at the May 25 trusted build.

36. At some point during the May 25 trusted build, a video recording was made of the trusted build procedure, including an image of the BIOS (Basic Input/Output System) passwords

for Mesa County's voting equipment. The BIOS passwords are set by civil servants of the Department of State and must be manually entered in-person to access the basic operating system of a voting system.

37. Upon information and belief, at some point after May 25, another copy of a hard drive of Mesa County voting equipment was made.

38. On Monday, August 2, 2021, video of the trusted build procedure in Mesa County and the BIOS passwords specific to Mesa County's voting system equipment, were posted to the social media site Telegram and the blog, The Gateway Pundit.

39. One week later, copies of the hard drive images for Mesa County's voting system software were also posted to social media.

40. Both the 21st Judicial District Attorney and the Federal Bureau of Investigation publicly confirmed that they have initiated criminal investigations into the security breach. *See* Justin Wingerter, *FBI investigating alleged Mesa County election equipment breach*, Denver Post, Aug. 17, 2021, <https://tinyurl.com/cjkd3pz9>. The Special Prosecutions Unit of the Colorado Attorney General's Office is also assisting with the investigations.

The Secretary of State's Response to the Breaches

41. Upon learning of these security breaches, the Secretary began an investigation.

42. On August 9, 2021, the Secretary issued Election Order 2021-01, based on her authority under C.R.S. §§ 1-1-107, 1-1-110(1), and 1-5-621(4), and Election Rules 20.3.1 and 20.10.5. The Order, which is attached as Exhibit 1, directed Respondent Peters to, among other things:

- a. Grant access to Department of State civil servant employees to reset BIOS passwords on Mesa County's voting machines;
- b. Identify individuals with access to Mesa County's voting systems and produce chain-of-custody logs and video surveillance of voting system components;
- c. Produce communications relating to the trusted build process; and
- d. Prohibit any individual from accessing any component of Mesa County's voting system.

43. On August 10, 2021, six civil servants from the Colorado Department of State traveled to Grand Junction to inspect voting equipment and chain-of-custody logs for the

equipment. At all times, the Department of State personnel were accompanied by a Mesa County employee. Employees from the 21st Judicial District Attorney's Office were also present.

44. Respondent Peters was not present for the August 10 inspection. Upon information and belief, she has not reported for work at the Clerk's office and is currently outside the state of Colorado. See Stina Sieg & Megan Verlee, *Supporters of Mesa Clerk Rally Saturday, Speaker Says Security Breach Did Occur*, CPR News, Aug. 21, 2021, <https://tinyurl.com/nm9adhn3>.

45. On August 12, 2021, the Secretary issued Election Order 2021-02, based on her authority under C.R.S. §§ 1-1-107, 1-1-110(1), and 1-5-621(4) and Election Rule 21.7.4. The Order, which is attached as Exhibit 2, prohibited the use of Mesa County's voting system components. The Order noted that, based on the Department of State's investigation, the chain of custody of those components could not be confirmed. Specifically:

- a. The Department could not confirm that the voting system was not accessed after the May 25 trusted build;
- b. Because video surveillance was turned off before the May 25 trusted build, the chain of custody after the trusted build could not be confirmed; and
- c. Chain of custody logs showed that several voting machines were not sealed to secure the equipment until 1-2 days after the trusted build installation, which left open the opportunity for tampering with the machines.

46. The Colorado County Clerks Association, which is an entity comprised of Colorado's sixty-four republican, democratic, and unaffiliated County Clerks and Recorders, announced its support for the Secretary's prohibition of use of Mesa County's voting equipment.

47. On August 17, 2021, the Secretary issued Election Order 2021-03, based on her authority under C.R.S. §§ 1-1-107, 1-1-110(1), and 1-7.5-104. The Order, which is attached as Exhibit 3, appointed Sheila Reiner "to supervise all conduct related to elections in Mesa County occurring under the authority of" the Elections Code. The Order also appointed a three-person advisory committee to advise and assist Ms. Reiner, consisting of State Representative Janice Rich, Ouray County Clerk and Recorder Michelle Nauer, and former Secretary of State Bernie Buescher.

48. Election Order 2021-03 did not remove Respondent Peters as the chief designated election official for the November 2, 2021 coordinated election or Respondent Knisley as the Deputy Clerk and possible successor to Respondent Peters, but does require the "Mesa County Clerk and Recorder and staff [to] take any and all lawful direction from Ms. Reiner" and prohibits Respondent Knisley and Sandra Brown from "supervising, accessing, or participating in any aspect of all elections occurring under the [Election Code] until otherwise instructed by the Secretary."

Mesa County's Response to the Breaches

49. On August 19, 2021, the Mesa County Board of County Commissioners adopted Resolution 2021-43, which is attached as Exhibit 4, characterizing Election Order 2021-03 as “effectively eliminat[ing] Tina Peters’ ability to supervise Mesa County Elections” and designating Wayne Williams as the chief designated election official for Mesa County’s November 2, 2021 coordinated election.

50. On August 23, 2021, Respondent Knisley was suspended with pay by Mesa County Human Resources Director Brenda Moore.

51. Undersigned counsel for the Secretary conferred with counsel for the Mesa County Board of County Commissioners before filing this Petition and understands that, if the relief requested by Petitioners is entered by the Court, Wayne Williams will be a paid contractor of the Board and Sheila Reiner will be classified and compensated as a temporary Mesa County employee.

FIRST CLAIM FOR RELIEF (Substantial Compliance under C.R.S. §§ 1-1-113 and 1-1-107(2)(d))

52. Petitioners incorporate the above allegations.

53. The Secretary of State is authorized to enforce the provisions of the Election Code by injunctive action brought by the Attorney General in the District Court for the judicial district in which any violation occurs, C.R.S. § 1-1-107(2)(d), and “[s]ubstantial compliance with the provisions or intent of this code shall be all that is required for the proper conduct of an election to which this code applies.” C.R.S. § 1-1-103(3).

54. Section 1-1-113(1) provides that upon filing “a verified petition in a district court of competent jurisdiction alleging that a person charged with a duty under this code has committed or is about to commit a breach or neglect of duty or other wrongful act, after notice to the official which includes an opportunity to be heard, upon a finding of good cause, the district court shall issue an order requiring substantial compliance with the provisions of [the Election Code].”

55. Respondent Peters has breached her duties and committed wrongful acts as the chief designated election official for Mesa County’s coordinated election under C.R.S. § 1-1-110(3), including, but not limited to: failing to maintain adequate documentation of chain of custody of voting machines required by Election Rule 20.3.1; failing to ensure a secure process for the May 25 trusted build, in violation of Election Rule 20.5.4; allowing unauthorized individuals to be present during the May 25 trusted build; and failing to cooperate with state and local election officials’ efforts to respond to and minimize the damage caused by the above breaches.

56. Respondent Knisley has also breached her duties and committed wrongful acts as the Deputy Clerk and possible successor to Respondent Peters as the chief designated election official for Mesa County's coordinated election under C.R.S. § 1-1-110(2), including but not limited to: facilitating the improper presence of the individual identified as Gerald Wood at the May 25 trusted build.

57. These wrongful acts and breaches of duty fall under C.R.S. § 1-1-113(1).

58. These wrongful acts and breaches of duty provide grounds under C.R.S. § 1-1-107(2)(d) to enjoin Respondent Peters from serving as the chief designated election official for the November 2, 2021 coordinated election in Mesa County, and to enjoin Respondent Knisley from serving as successor to Respondent Peters in that role.

59. Under C.R.S. § 1-1-110(2), the powers and authority granted to the County Clerk and Recorder may be, but are not required to be, exercised by a Deputy Clerk if the County Clerk is absent or "for any reason is unable to perform the required duties."

60. Respondent Peters presently is absent and, even if she returns to the Mesa County Clerk and Recorder's Office, she is unable to perform the required duties as a result of her above wrongful acts and breaches of duties.

61. Respondent Knisley also presently is absent and, even if she returns to the Mesa County Clerk and Recorder's Office, she is unable to perform the required duties as a result of her above wrongful acts and breaches of duties.

62. To substantially comply with the Elections Code, including C.R.S. § 1-1-110(2), and Elections Rules, Petitioners respectfully request an Order that:

- a. Respondent Peters is absent and/or unable to perform the required duties under C.R.S. § 1-1-110(3) as the chief designated election official for the November 2, 2021 coordinated election in Mesa County;
- b. Respondent Knisley is absent and/or unable to perform the required duties under C.R.S. § 1-1-110(2) as the Deputy Clerk and possible successor to Respondent Peters as the chief designated election official for the November 2, 2021 coordinated election in Mesa County;
- c. Wayne Williams shall serve as the chief designated election official for the November 2, 2021 coordinated election in Mesa County, as requested by the Mesa County commissioners; and
- d. Sheila Reiner shall serve as the Elections Supervisor for the November 2, 2021 coordinated election in Mesa County.

SECOND CLAIM FOR RELIEF
(Alternatively, injunctive and declaratory relief under C.R.C.P. 57)

63. Petitioners incorporate the above allegations.
64. Alternatively, Petitioners seek injunctive and declaratory relief under C.R.C.P. 57.
65. Under C.R.C.P. 57(b), any person whose rights, status, or other legal relations are affected by a statute may have determined any question arising under the statute and may obtain a declaration of rights, status, or other legal relations thereunder.
66. Injunctive and declaratory relief are necessary here to settle the rights, status, or other legal relations of Petitioner and Respondents under the Election Code and Election Rules.
67. Accordingly, Petitioners respectfully request an Order:
- a. Declaring that Respondent Peters is absent and/or unable to perform the required duties and enjoining her from serving as the chief designated election official for the November 2, 2021 coordinated election in Mesa County;
 - b. Declaring that Respondent Knisley is absent and/or unable to perform the required duties and enjoining her from serving as the chief designated election official for the November 2, 2021 coordinated election in Mesa County;
 - c. Declaring that Wayne Williams shall serve as the chief designated election official for the November 2, 2021 coordinated election in Mesa County; and
 - d. Declaring that Sheila Reiner shall serve as the Elections Supervisor for the November 2, 2021 coordinated election in Mesa County.

PRAYER FOR RELIEF

WHEREFORE, the Petitioners respectfully request that this Court, under C.R.S. §§ 1-1-113(1) and 1-1-107(2)(d), or alternatively C.R.C.P. 57, issue the following ORDER:

- A. Declaring that Respondent Peters is absent and/or unable to perform the required duties and enjoining her from serving as the chief designated election official for the November 2, 2021 coordinated election in Mesa County.
- B. Declaring that Respondent Knisley is absent and/or unable to perform the required duties and enjoining her from serving as the chief designated election official for the November 2, 2021 coordinated election in Mesa County.

- C. Declaring that Wayne Williams shall serve as the chief designated election official for the November 2, 2021 coordinated election in Mesa County.
- D. Declaring that Sheila Reiner shall serve as the Elections Supervisor for the November 2, 2021 coordinated election in Mesa County.
- E. Granting such other and further relief as the Court deems just and proper.

DATED: August 30, 2021.

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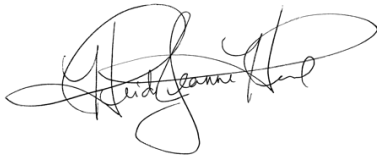
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VERIFICATION

I declare under the penalty of perjury pursuant to the law of Colorado that the factual allegations set forth in the foregoing Verified Petition for Relief Under C.R.S. § 1-1-113 are true and correct to the best of my knowledge, information, and belief.

Executed on the 29th day of August, 2021, in the County of Mesa, State of Colorado.

Heidi Jeanne Hess
(printed name)



(signature)
