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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

ROGAN O'HANDLEY,

Plaintiff,

v.

ALEX PADILLA, in his personal capacity; SKDKNICKERBOCKER, LLC, a Delaware company; PAULA VALLE CASTAÑON, in her personal capacity; JENNA DRESNER, in her personal capacity; SAM MAHOOD, in his personal capacity; AKILAH JONES; in her personal capacity; SHIRLEY N. WEBER, in her official capacity as

Case Number:

COMPLAINT FOR DECLARATORY JUDGMENT, DAMAGES, AND INJUNCTIVE RELIEF

DEMAND FOR JURY TRIAL

California Secretary of State; TWITTER, INC., a Delaware corporation; NATIONAL ASSOCIATION OF SECRETARIES OF STATE, a professional nonprofit organization;

Defendants.

Plaintiff Rogan O'Handley, through his undersigned counsel, states the following claims for relief against Alex Padilla, in his personal capacity; SKDKnickerbocker, LLC, a Delaware corporation; Paula Valle Castañon, in her personal capacity; Jenna Dresner, in her personal capacity; Sam Mahood, in his personal capacity; Akilah Jones; in her personal capacity; Shirley N. Weber, in her official capacity as California Secretary of State; Twitter, Inc., a Delaware corporation; and the National Association of Secretaries of State, a professional nonprofit organization.

INTRODUCTION

1. Against a backdrop of alleged foreign interference in the 2016 election, various state election agencies, state election officials, national organizations, and social media companies mounted campaigns to combat election misinformation concerns on social media for the 2020 election. While many of these entities pursued a traditional path of educating the public with useful information, others went in a new direction, seeking aggressively to suppress speech they deemed to be "misleading," under the guise of fostering "election integrity." The State of California generally, and the Secretary of State's Office of Elections Cybersecurity in partnership with the other Defendants specifically, took the latter path.

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2. California's initial foray into the brave new world of engineering better election outcomes, California Elections Code §10.5, created the Office of Elections Cybersecurity in 2018 to "educate voters" with "valid information" through empowering election officials (hereinafter "OEC"). This seemingly benign mandate quickly and predictably devolved into a political weapon for censorship of disfavored speech by an overtly partisan Secretary of State's office, more resembling an Orwellian "Ministry of Approved Information" than a constitutionally restrained state agency. The OEC deployed government force to bolster the personal political goals of Democrat office holders, most notably including then-Secretary of State Alex Padilla ("Padilla"). Padilla abused his office and the public trust in a myriad of ways, unprecedented even in a California where political corruption has become part of the landscape, as predictable as the sun setting over the Pacific Ocean.

3. Plaintiff Rogan O'Handley ("Mr. O'Handley) was just one of many speakers targeted in California's tainted censorship process. Mr. O'Handley's speech infraction was his expression of the opinion that California, along with the rest of the nation, should audit its elections to protect against voter fraud. A Democratic political consultant—hired with taxpayer dollars in a closed-bid, closed-door boondoggle to which not even California's Democrat Controller could turn a blind eye—flagged Mr. O'Handley's inconvenient speech to the OEC as evidence of "election misinformation." The OEC, an office within the primary agency whose job performance would be scrutinized by an audit, then contacted Twitter through dedicated channels Defendants created to streamline censorship requests from government agencies. Twitter promptly complied with the OEC's request to censor Mr. O'Handley's problematic opinions from its platform, and ultimately banned his account, which had reached over 440,000 followers at its zenith, for violating Twitter's civic integrity policy.

4. The founding fathers fought and died for the right to criticize their government, and enshrined that foundational right as central in the pursuit of the new

nation. Defendants' exercise of government force to censor political speech with which they disagree flies in the face of the ideals upon which our nation was founded, and violates numerous state and federal constitutional rights.

JURISDICTION

5. This Court has federal question jurisdiction over this case pursuant to 28 U.S.C. §§ 1331 because Plaintiff's claims arise under the First and Fourteenth Amendments to the U.S. Constitution. Further, the Court has jurisdiction pursuant to 28 U.S.C. § 1343 because Plaintiff seeks relief under 42 U.S.C. § 1983.

6. This action is an actual controversy, and under 28 U.S.C. §§ 2201 and 2202, this Court has authority to grant declaratory relief, and other relief, including temporary, preliminary, and permanent injunctive relief, pursuant to Rule 65 of the Federal Rules of Civil Procedure, and may declare the rights of Plaintiff.

7. This Court has supplemental jurisdiction over state law claims presented in this matter pursuant to 28 U.S.C. § 1367, because the claims are so related to the federal constitutional claims in this action such that they do not raise novel or complex issues of state law and do not substantially predominate over the federal claims. There are, further, no exceptional circumstances compelling declining state law claims.

8. Venue is proper in the Central District of California under 28 U.S.C. § 1391(b)(1) because a plurality of Defendants maintain residence or offices in Los Angeles County, and most Defendants are residents of California (within the meaning of 28 U.S.C. § 1391(c)). Venue is also proper under 28 U.S.C. § 1391(b)(2) because a substantial part of the acts or omissions giving rise to the claim occurred in this judicial district.

PARTIES

9. Plaintiff Rogan O'Handley resides in St. Petersburg, Florida. He is an attorney licensed to practice in the state of California, social media influencer with over 3 million combined followers across various social media platforms, civil rights activist, political commentator, and journalist.

10. Defendant Alex Padilla ("Padilla"), sued in his personal capacity, was California Secretary of State at the time of the injury to Plaintiff, authorized the disputed contract with Defendant SKDK, and oversaw the efforts to take down disfavored speech. Upon information and belief, Defendant Padilla is a resident of Los Angeles County.

11. Defendant SKDKnickerbocker LLC ("SKDK") is a public affairs and consulting firm known for working with Democrat politicians and political hopefuls, and for progressive political causes. SKDK is a Delaware company that maintains a California office at 3105 S. La Cienega Blvd., Los Angeles, CA 90016.

12. Defendant Paula Valle Castañon ("Ms. Castañon"), upon information and belief previously going by the name of Paula Valle, sued in her personal capacity, at the time of Plaintiff's injury served as the Deputy Secretary of State, Chief Communications Officer for Alex Padilla, California Secretary of State. Ms. Castañon led the communications division of the Office of the Secretary of State. Upon information and belief, Ms. Castañon is a resident of Los Angeles County.

13. Defendant Jenna Dresner ("Ms. Dresner"), sued in her personal capacity, is Senior Public Information Officer for the OEC. Upon information and belief, Ms. Dresner is a resident of Los Angeles County.

14. Defendant Sam Mahood ("Mr. Mahood"), sued in his personal capacity, was Press Secretary for California Secretary of State Alex Padilla, and one of the OEC employees responsible for receiving reports of alleged election misinformation from Defendant SKDK and requesting social media platforms censor speech with which the OEC disagreed during the 2020 election. When Mr. Padilla was elevated to become United States Senator from California, Sam Mahood followed Mr. Padilla to become his Special Projects and Communications Advisor. Upon information and belief, Mr. Mahood is a resident of Sacramento County.

15. Defendant Akilah Jones ("Ms. Jones"), sued in her personal capacity, was OEC's Social Media Coordinator responsible for receiving reports of election

misinformation from Defendant SKDK and requesting social media platforms censor speech with which the OEC disagreed during the 2020 election. Upon information and belief, Ms. Jones is a resident of Sacramento County.

16. Defendant Shirley N. Weber, sued in her official capacity as California Secretary of State, is the state official responsible for implementing California Elections Code §10.5. and has oversight over the actions of the OEC. She maintains an office in Sacramento County.

17. Defendant Twitter is a microblogging and social networking service with roughly 330 million monthly active users. Twitter is incorporated in Delaware and maintains its principal place of business at 1355 Market Street, Suite 900, San Francisco, CA 94103.

18. Defendant National Association of Secretaries of State is a professional organization for state Secretaries of State, headquartered at 444 North Capitol Street NW, Suite 401, Washington, D.C., 20001. The National Association of Secretaries of State does business in California, and the California Secretary of State is an association member.

FACTS

19. In 2018, the California legislature passed, and then-Governor Brown signed, AB 3075, which created the OEC within the California Secretary of State's office.

20. Codified at California Elections Code §10.5, one of the "primary missions" of the OEC is "[t]o monitor and counteract false or misleading information regarding the electoral process that is published online or on other platforms and that may suppress voter participation or cause confusion and disruption of the orderly and secure administration of elections." Cal.Elec.Code § 10.5(b)(2).

21. California Elections Code § 10.5 further states the OEC shall, "[a]ssess the false or misleading information regarding the electoral process described in paragraph (2) of subdivision (b), mitigate the false or misleading information, and

educate voters, especially new and unregistered voters, with valid information from elections officials such as a county elections officials or the Secretary of State." Cal.Elec.Code § 10.5(c)(8).

22. The OEC, under the direction of then-Secretary of State Padilla, seized on the statutory phrase "mitigate [] false or misleading information," as a license to quash politically-disfavored or inconvenient speech.

23. Padilla's censorship program targeted speech implicating his administration of elections in his capacity as Secretary of State.

24. In a written response to CalMatters reporter Freddy Brewster's November 2020 inquiry regarding how OEC handled "voter misinformation," the OEC explained: "[O]ur priority is working closely with social media companies to be proactive so when there's a source of misinformation, we can contain it." A true and correct copy of OEC's comments, as obtained through a public record request, is attached to this complaint as Exhibit 1.

25. The OEC further explained the close working relationship with private social media companies thus:

> We have working relationships and dedicated reporting pathways at each major social media company. When we receive a report of misinformation on a source where we don't have a pre existing pathway to report, we find one. We've found that many social media companies are taking responsibility on themselves to do this work as well. **We work[] closely and proactively with social media companies to** keep misinformation from spreading, **take down sources of misinformation as needed,** and promote our accurate, official election information at every opportunity.

See Exhibit 1 (emphasis added).

26. The National Association of Secretaries of State ("NASS") spearheaded efforts to censor disfavored election speech.

27. NASS created direct channels of communication between Secretaries of States' staff and social media companies to facilitate the quick take-down of speech deemed "misinformation."

28. For instance, NASS Director of Communications Maria Benson stated in email that Twitter asked her to let Secretaries of States' offices know that it had created a separate dedicated way for election officials to "flag concerns directly to Twitter." A true and correct copy of Maria Benson's October 1, 2020, email, as obtained through a public records request, is attached to this complaint as Exhibit 2.

29. NASS's dedicated reporting channel to Twitter, according to Maria Benson, would get Secretaries of States' employees' censorship requests "bumped to the head of the queue." A true and correct copy of Maria Benson's August 8, 2020, email, as obtained through a public record request, is attached to this complaint as Exhibit 3.

30. NASS asked its members to give it a "heads up" when officials saw mis- or disinformation on social platforms to help NASS "create a more national narrative." A true and correct copy of Maria Benson's August 8, 2020, email, as obtained through a public record request, is attached to this complaint as Exhibit 4.

31. NASS wanted election officials to have NASS's email guidance regarding how to report "mis/disinformation" directly to social media companies "handy" directly prior to election day as election officials "prepare[d] for battle." A true and correct copy of Maria Benson's November 2, 2020, email, as obtained through a public record request, is attached to this complaint as Exhibit 4.

32. The California Secretary of State's office participated in Twitter's dedicated "Partner Support Portal."

33. Presumably, the California Secretary of State's office's participation in Twitter's "Partner Support Portal" did ensure the Secretary of State's requests to take down speech were a high priority for Twitter.

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34. As an example, on December 30, 2019, Mr. Mahood emailed Twitter's Kevin Kane the following regarding another Twitter user (not Mr. O'Handley):

On Mon, Dec 30, 2019 at 9:05 PM Mahood, Sam <[redacted]> wrote:

Hi Kevin,

Flagging the following tweet that I reported through the partner portal. This tweet is sharing a doctored image of a California Voter Registration Card (inaccurately claiming that the Republican Party is not an option): https://twitter.com/Paul_USAPatriot/status/1211709756311621633

We would like this tweet taken down ASAP to avoid the spread of election misinformation.

Please let us know if there is anything else we can do to facilitate this request.

Thank you,

-Sam

35. Kevin Kane responded to Sam Mahood's request to take down the tweet before 8:00 am the next morning, which happened to be New Year's Eve, stating:

To: Mahood, Sam[redacted]
Cc: Reyes, Steve[redacted]; Valle, Paula[redacted]

From: Kevin Kane[redacted]
Sent: Tue 12/31/2019 7:51:23 AM (UTC-08:00)
Subject: Re: Fw: Case# 0136918935: partner_election [ref:00DA0000000K0A8.5004A00001qaD26:ref]

Sam-

Thank you for reporting, this Tweet has been removed. Please don't hesitate to contact me if there is anything else we can do.

Best regards,

Kevin

See Exhibit 5.

36. At the same time OEC officials and NASS were working externally to streamline their speech takedown processes with social media companies, the OEC also decided to broaden and outsource its efforts to search out "objectionable" speech to censor.

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37. On July 17, 2020, Padilla's office sent an email to fifteen political consultants and political affairs professionals, many of whom worked on the campaigns of prominent Democrats, offering them the opportunity to participate in an invitation-only, expedited bidding process outside California's Public Contract Code's mandated transparent competitive bid process. The winning bid would facilitate the office's $35-million-dollar "Vote Safe California" initiative.

38. The purpose of the Public Contract Code's mandated transparent competitive bid process is to protect taxpayers against cronyism and partisanship.

39. Mr. Padilla sidestepped the Public Contract Code's statutory bidding requirements by claiming he had "emergency authority" to create the contract.

40. Padilla received seven bids from the OEC's hand-picked list of political consultants/allies.

41. Padilla's staff, in a closed-door review process, anointed the winner of the $35-million-dollar contract.

42. Padilla awarded the $35-million-dollar contract to Defendant SKDKnickerbocker ("SKDK"), a political consulting firm heavily involved in then-candidate Joe Biden's presidential campaign.

43. As described by Reuters.com, "SKDK is closely associated with the Democratic Party, having worked on six presidential campaigns and numerous congressional races." See Joel Schechtman, Raphael Satter, Christopher Bing, Joseph Menn, Exclusive: Microsoft believes Russians that hacked Clinton targeted Biden campaign firm – sources, REUTERS (Sept. 10, 2020, 12:30 am), https://www.reuters.com/article/us-usa-election-cyber-biden-exclusive/exclusive-russian-state-hackers-suspected-in-targeting-biden-campaign-firm-sources-idUSKBN2610I4.

44. Padilla's contract award to SKDK raised bipartisan ire, for different reasons.

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45. Congressional and State Republicans questioned the appropriateness of SKDK, which publicly boasted its involvement and support for one of the presidential candidates on the ballot, spending taxpayer dollars to create and administer a "non-partisan" voter information campaign at the behest of a partisan Democrat public official.

46. Additionally, at the time of the award, Padilla was reportedly already under consideration to fill then Vice-Presidential candidate Kamala Harris's California Senate seat, should Biden/Harris win the presidential Election. See Bee Editorial Board, If Gavin Newsom picks Alex Padilla for the U.S. Senate, who owns his $34 million mess?, (December 17, 2020) https://www.sacbee.com/opinion/editorials/article247894900.html.

47. Padilla's considerable investment of taxpayer dollars to a Biden-ticket associated firm, when he presumably stood to personally benefit from that ticket's elevation to higher office, smacked of a conflict of interest. *Id.*

48. Further, Fabian Núñez, former Assembly Democratic speaker and partner at losing bidder Mercury Public Affairs, also raised significant questions regarding the contract award. Emily Hoeven, Will state stick 'Team Biden' firm with $35 million tab after Yee balks at Padilla vote contract?, CALMATTERS.ORG (November 23, 2020), https://calmatters.org/politics/2020/11/biden-firm-california-vote-contract-padilla-yee/.

49. Núñez filed a formal protest with the Secretary of State stating SKDK's proposal contained "material violations" that led to SKDK having a "significant and profound unfair advantage in winning the work." *Id.*

50. Núñez requested the Secretary of State administer "[a] fair bidding process in which all responsible bidders are evaluated by the exact same rules [as] the public and all bidders expect." *Id.*

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51. Padilla's office rejected Núñez's protest on Sept. 1, stating that "common procedures or practices applicable to competitive bid agreements … do not apply for the process used for an emergency contract." *Id.*

52. In addition to a suspect process, Padilla awarded this contract despite having no budgetary authority for it.

53. Padilla's lack of budgetary authority to award the contract led California State Controller Betty Yee to reject paying SKDK in a public and drawn-out battle over the state's budgetary authority. Associated Press, California lawmakers ok payment for voter outreach campaign, FOX 40 (February 23, 2021, 9:21 AM) https://fox40.com/news/california-connection/california-lawmakers-ok-payment-for-voter-outreach-campaign/.

54. SKDK did not receive payment until February 2021, after Padilla's elevation to be California's next Senator. *Id.*

55. In February 2021, by a party line vote, the California legislature agreed to pay Padilla's past due bills to SKDK. *Id.*

56. While the controversy over the contract raged, SKDK rapidly went to work as a hatchet for hire to target Padilla's political enemies, relabeling even innocuous speech that criticized Padilla's handling of election administration as "false" and "dangerous" attempts at voter suppression and voter fraud.

57. Using state funds, SKDK created political hit lists of disfavored speech, which Defendants called a "Misinformation Daily Briefing."

58. These "Misinformation Daily Briefings" were sent via email to Defendants Paula Valle Castañon, Jenna Dresner, Sam Mahood, and Akilah Jones at the California Secretary of State's communications office. A true and correct copy of one such "Misinformation Daily Briefing" from November 13, 2020, is attached to this complaint as Exhibit 6.

59. The OEC curated the "misinformation" contained in the misinformation daily briefings for submission to social media companies.

60. The OEC reported "misinformation" to social media companies directly.

61. The OEC also reported "misinformation" to social media companies through NASS.

62. Alex Padilla was proud of the OEC's speech-censoring activities and track record, as was NASS.

63. NASS has an annual award called the Innovation, Dedication, Excellence & Achievement in Service ("IDEAS") award, recognizing "significant state contributions to the mission of NASS."

64. The California Secretary of State's office won NASS's 2020 award for the OEC's work. Specifically noted in OEC's IDEAS award application was the following:

> The Office of Election Cybersecurity created VoteSure, which was a first-of-its-kind public education initiative to promote trusted, accurate, and official sources of election information on Facebook, Instagram, and Twitter. The goal of VoteSure was to increase voter awareness about election misinformation online and provide official, trusted election resources.
>
> …
>
> Election security continues to be a top priority for the Secretary of State's office, and we are continuing to work around the clock to protect the integrity of our systems ahead of Election 2020 and to combat misinformation through our Office of Election Cybersecurity.
>
> …
>
> The Office of Election Cybersecurity discovered nearly 300 erroneous or misleading social media posts that were identified and forwarded to Facebook and Twitter to review and 98 percent of those posts were
>
> promptly removed for violating the respective social media company's community standards.

65. Alex Padilla also stated his support for the OEC's speech-censoring activities in response to receiving the award, touting the initiative's "proactive social media monitoring":

> We worked in partnership with social media platforms to develop more efficient reporting procedures for potential misinformation. Misinformation identified by our office or voters was promptly reviewed and, in most cases, removed by the social media platforms.

A true and correct copy of the OEC's NASS 2020 IDEAs award submission and NASS's press release announcing presentation of the award are attached as Exhibits 7 and 8.

66. Defendants' carefully crafted propaganda campaign, or as they called it, "national narrative," suppressed the protected speech of citizens who might seek greater government accountability or ask questions regarding election processes.

67. This self-serving "national narrative," conveniently, also bolstered and protected certain Defendants' political fortunes.

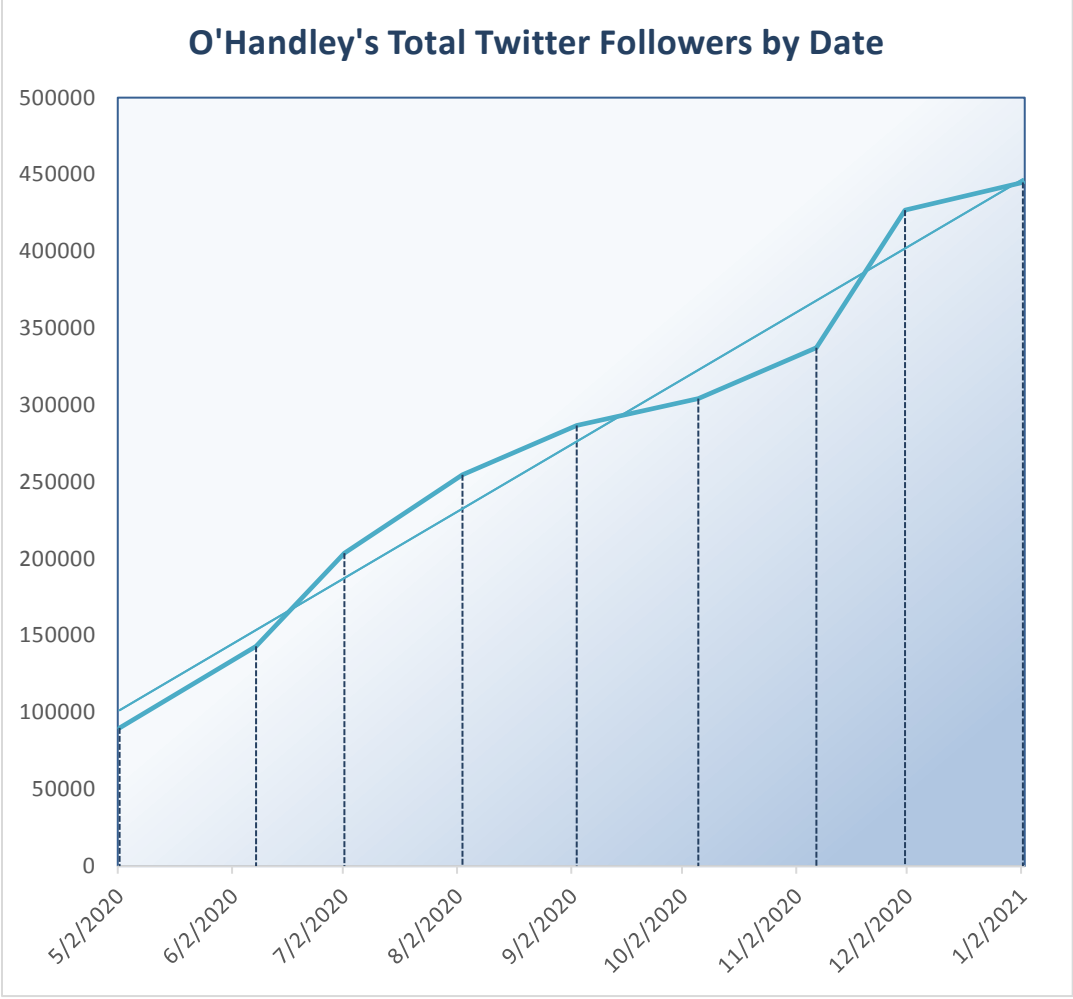
68. The "national narrative" advanced by the California censorship scheme included supporting the victory of SKDK's client Joe Biden, the elevation of California Senator Kamala Harris to the Vice Presidency, and creating an opening for Padilla himself to be elevated to the position of United States Senator from California. Padilla's "one simple trick" of awarding an ultra vires censorship contract to a political ally, created a Rube-Goldberg-like contraption catapulting him to Washington, D.C.

69. Mr. O'Handley, under the social media handle "DC_Draino," was one of the many speakers targeted by Defendants for his speech about the election, supposedly too dangerous for a gullible public to be allowed to read.

70. Mr. O'Handley has a law degree from the University of Chicago Law School and is licensed to practice law in the state of California. After six-plus years practicing corporate and entertainment law, Mr. O'Handley left private practice in order to better utilize his legal education in defense of liberty and constitutional ideals.

His primary efforts focus on social media postings, public speaking at colleges and political conferences, and being a political commentator. As one measure of his influence, he has had over 75 national news network appearances in the last year and half. Mr. O'Handley's combined social media following across all his accounts currently reaches over 3 million people. He was invited to the White House social media summit in 2019, which focused, ironically, on the censorship of conservative voices on social media.

71. By the end of November 2020, Mr. O'Handley had approximately 420,000 Twitter followers. Just six months prior in May 2020, Mr. O'Handley had approximately 89,000 Twitter followers, meaning Mr. O'Handley had over a 371% increase in followers in the lead up to the 2020 election and in the following weeks as votes were counted and state legislatures certified the electoral college.



72. Mr. O'Handley authored a November 12, 2020, Twitter post stating:

(Hereinafter, the "Post").

73. Mr. O'Handley's Post expressed an opinion widely held by California voters. An October 2020 poll by Berkeley's Institute of Government Studies released found that four in ten Californians "express[ed] skepticism that [the 2020] presidential election [would] be conducted in a way that's fair and open."

74. Despite the Post's expression of Mr. O'Handley's personal opinion regarding the need for greater accountability in election processes—core political speech directly questioning Padilla's administration of and fitness for his political office—SKDK labeled the Post as "misinformation," and flagged the Post for the OEC to potentially target with its broad government powers:

To: Valle, Paula [redacted]; Dresner, Jenna [redacted]; Mahood, Sam [redacted]; Jones, Akilah [redacted]
Cc: Heather Wilson [redacted]; Emily Campbell [redacted]; Jason Rosenbaum [redacted]; Tania Mercado [redacted]; Grace Gill [redacted] Julia Schechter [redacted]
From: Zeke Sandova [redacted]
Sent: Fri 11/13/2020 4:43:28 PM (UTC-08:00)
Subject: Misinformation Daily Briefing: 11/13

@DC_Draino tweeted, "Audit every California ballot Election fraud is rampant nationwide and we all know California is one of the culprits Do it to protect the integrity of that state's elections."

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75. The OEC, following the recommendation of the Democrat operatives at SKDK, flagged the Post as "Case# 0180994675" under the indicator of "voter fraud," and color coded it as an "orange" level threat in internal OEC documents. Upon information and belief, an orange threat level indicates moderately problematic speech between yellow and red.

76. On November 17, 2020, at 12:31 PM, a Secretary of State agent or staff member sent Twitter the following message regarding Mr. O'Handley's Post:

Case# 0180994675: partner_election [ref:00DA0000000K0A8.5004w0000225CNh:ref]	11/17/20	12:31 PM	Hi, We wanted to flag this Twitter post: https://twitter.com/DC_Draino/status/1327073866578096129 From user @DC_Draino. In this post user claims California of being a culprit of voter fraud, and ignores the fact that we do audit votes. This is a blatant disregard to how our voting process works and creates disinformation and distrust among the general public.

77. Shortly after Padilla's agent or staff member "flagged" Mr. O'Handley's post to Twitter, Twitter subsequently appended commentary asserting that Mr. O'Handley's claim about election fraud was disputed. A true and correct copy of OEC's comments, as obtained through public record request, is attached to this complaint as Exhibit 9.

78. Twitter then added a "strike" to Mr. O'Handley's account.

79. Twitter utilizes a strike system, whereby users incurring "strikes" face progressive penalties, culminating in removal from Twitter altogether after five strikes.

80. The OEC tracked Twitter's actions on internal spreadsheets and noted that Twitter had acted upon the request to censor Mr. O'Handley's speech.

81. Prior to OEC requesting Twitter censor the Post, Twitter had never before suspended Mr. O'Handley's account or given him any strikes. He suddenly became a target of Twitter's speech police, at the behest of Defendants.

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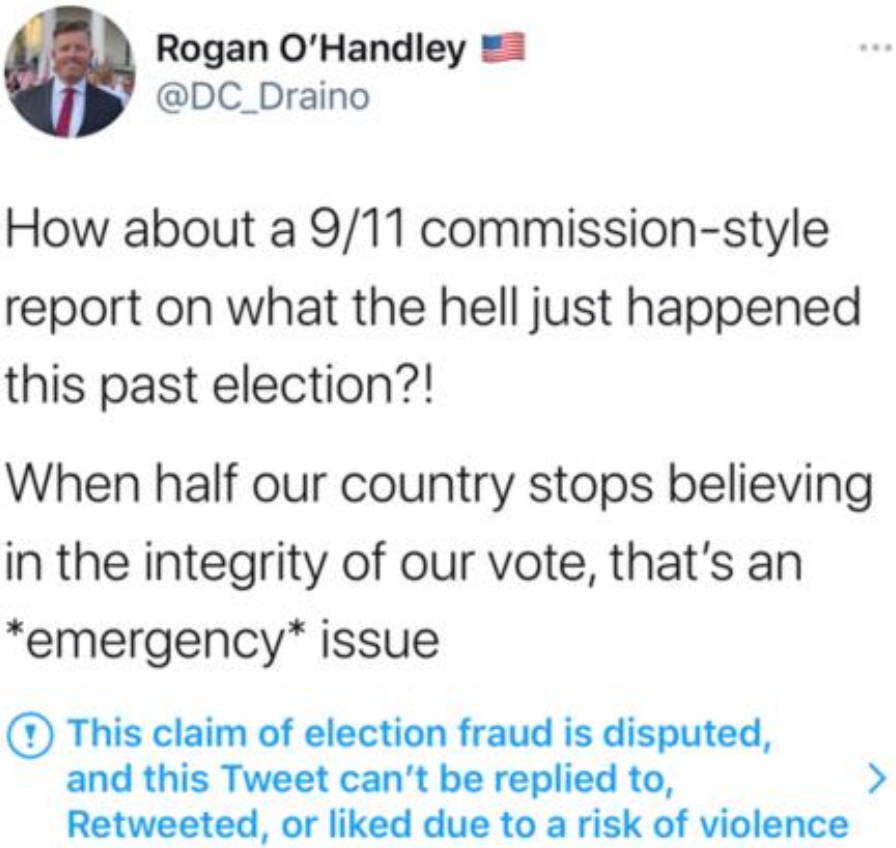
82. Between November 2020 and January 2021, Mr. O'Handley's Twitter following continued to grow. By January 2021, Mr. O'Handley had over 444,000 Twitter followers.

83. During this time period, Mr. O'Handley was far from the only speaker on Twitter suggesting the need for an audit or the existence of voter fraud in the aftermath of the 2020 election. Countless individuals suggesting the need for audits, including both Democrat and Republican voices upset at perceived problems. Numerous commentators, appearing to support Democrats, voiced their opinion of a need to audit results in conservative areas where Republicans fared better in down ballot races than expected. Yet, Defendants focused their speech censorship efforts on conservative requests for transparency in election processes rather than the same calls from self-identified political liberals.

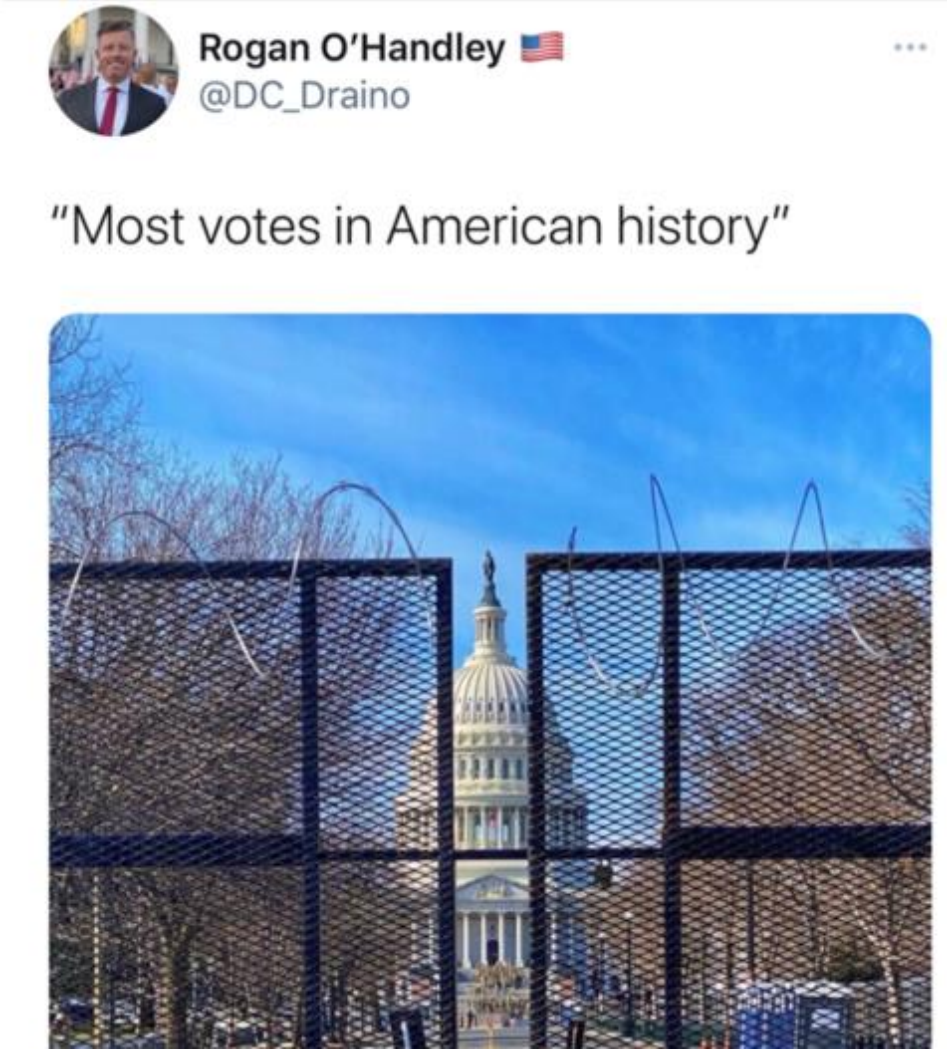
84. On January 18, 2021, Mr. O'Handley posted the following tweet, for which Twitter gave Mr. O'Handley a strike.

85. On January 21, 2021, Mr. O'Handley posted another Tweet, for which Twitter gave Mr. O'Handley a strike.

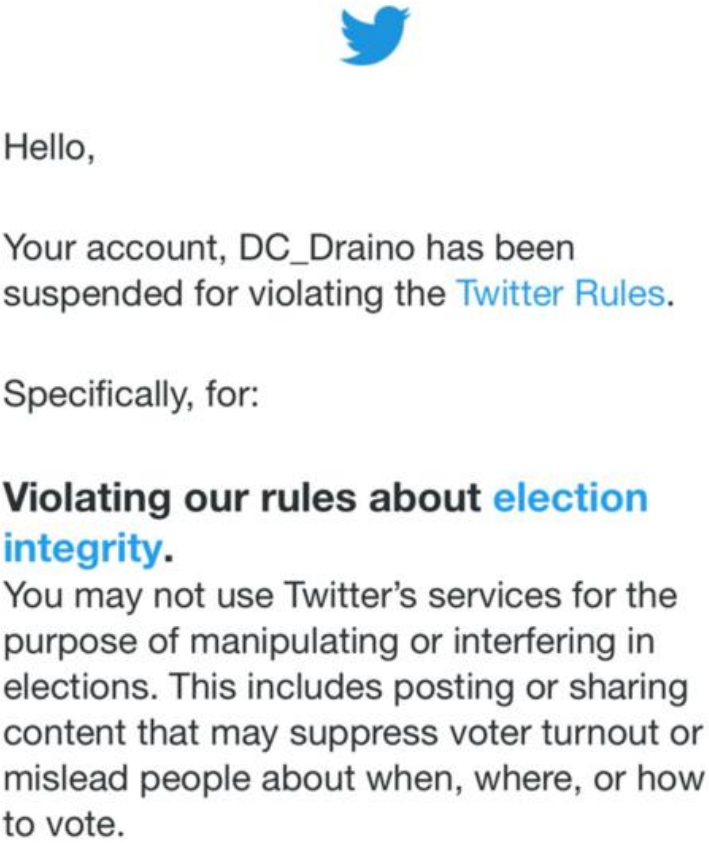
86. On January 22, 2021, Mr. O'Handley suggested via Tweet that the government consider facilitating a 9/11-style commission to study the 2020 election, stating it is an "emergency" issue when half the country stops believing in the integrity of the vote. Twitter again gave Mr. O'Handley a strike and locked his account for seven days, stating the Tweet included a claim of election fraud which was disputed.



87. On February 22, 2021, Mr. O'Handley Tweeted the following:



88. In response, Twitter permanently suspended Mr. O'Handley's account stating:



Hello,

Your account, DC_Draino has been suspended for violating the Twitter Rules.

Specifically, for:

Violating our rules about election integrity.
You may not use Twitter's services for the purpose of manipulating or interfering in elections. This includes posting or sharing content that may suppress voter turnout or mislead people about when, where, or how to vote.

89. Twitter never elaborated on how Mr. O'Handley's five-word Tweet and photograph of the U.S. Capitol (incidentally, Mr. Padilla's new workplace)—which was posted well after the 2020 election had been certified and a new President installed in office—manipulated or interfered with an election, suppressed voter turnout, or misled people about when, where, or how to vote. Indeed, at the time of the post, the next national general election was nearly two years away.

90. Twitter serves as the primary social channel for political commentary and news in American society at present.

91. As a rising political commentator, Twitter's ban has had a direct and detrimental impact on Mr. O'Handley's ability to make a living in his chosen profession.

92. In January 2021, O'Handley had well over 440,000 followers on Twitter.

93. O'Handley's reach, which was growing exponentially at the time of his permanent ban, had garnered him paid media contract offers, numerous media appearances, paid speaking opportunities, valuable professional networking, endorsements, and advertising dollars.

94. Mr. O'Handley lost his platform to communicate with his followers, irreparably damaging his business, which depends on the reach of his audience for revenue.

95. Asking to audit an election to protect the integrity of elections is not "voter fraud." It is a regular practice of election administration.

96. Suggesting the country consider a non-partisan commission to study the election in an attempt to restore the country's trust in the integrity of the voting process is not a factual claim, and certainly not one that includes a risk of violence.

97. The statement "Most votes in American history" is a true fact about the 2020 presidential election.

98. Truthful speech and opinion about elections and elected officials has been protected by the First Amendment since our nation's founding. The right to criticize the government is the basis upon which this country was founded. Yet Defendants targeted Mr. O'Handley's speech for censorship because of his criticism of the government, a direct affront to our constitutional ideals.

99. Upon information and belief, discovery will show Twitter's stated reasons for suspending Mr. O'Handley were pretextual. Twitter's real reasons for suspending Mr. O'Handley do not stem from a violation of Twitter's terms of service, but from the content of his speech raising concerns about election administration and integrity, specifically concerns related to the work of then-California Secretary of State Alex Padilla. The trigger for Twitter's censorship of Mr. O'Handley was its coordination and conspiracy with other Defendants to silence the protected speech of many Americans.

//

100. Defendants' government censorship of speech seeking to hold elected officials accountable for the exercise of their office is anathema to the Constitution. It strikes directly at the heart of the First Amendment.

CLAIMS

First Claim for Relief

First Amendment – Free Speech (42 U.S.C. § 1983)

(By Plaintiff Against All Defendants)

101. Mr. O'Handley incorporates by reference and re-alleges herein all Paragraphs above.

102. California Election Code § 10.5, as-applied by Defendants, violates the Free Speech clause of the First Amendment.

103. Defendants also used California Election Code § 10.5 to retaliate against Mr. O'Handley for his speech.

104. Political speech is core First Amendment speech, critical to the functioning of our republic.

105. Political speech rests on the highest rung of the hierarchy of First Amendment values.

106. Defendants weaponized California Election Code § 10.5 and the OEC to censor Plaintiff's political speech.

107. State action designed to retaliate against and chill political expression strikes at the heart of the First Amendment.

108. Defendants' actions directly abridged Mr. O'Handley's protected political speech.

109. Defendants jointly acted in concert to abridge Mr. O'Handley's freedom of speech and deprive Mr. O'Handley of his First Amendment rights.

110. Defendants Twitter, SKDK, and NASS willfully and cooperatively participated in the government Defendants' efforts to censor Mr. O'Handley's political speech.

111. Defendants Alex Padilla, Paula Valle Castañon, Jenna Dresner, Sam Mahood, Akilah Jones deprived Mr. O'Handley of his First Amendment free speech rights acting under color of state law, and Mr. O'Handley's free speech rights were clearly established at the time of Defendants' speech chilling actions.

112. Defendants Alex Padilla, Paula Valle Castañon, Jenna Dresner, Sam Mahood, Akilah Jones, acting in their official capacities, took action, jointly with SKDK, Twitter, and NASS, against Mr. O'Handley with the intent to retaliate against, obstruct, or chill Mr. O'Handley's First Amendment rights.

113. Mr. O'Handley engaged in constitutionally protected activity through his speech questioning the conduct of elections and the actions of elected officials.

114. Defendants targeted and censored Mr. O'Handley's speech.

115. Defendants' actions would chill a person of ordinary firmness from continuing to engage in protected activity.

116. The protected activity, Mr. O'Handley's speech which Defendants found objectionable, was a substantial motivating factor in Defendants' decision to censor Mr. O'Handley's speech.

117. Defendants' speech-chilling actions specifically and objectively infringed Mr. O'Handley's speech rights under the United States Constitution.

118. There was a clear nexus between Defendants' actions and the intent to chill Mr. O'Handley's speech.

119. Mr. O'Handley suffered economic and reputational injuries, among others, as a result.

120. Defendants' restriction of Mr. O'Handley's speech was content-based.

121. Defendants had no compelling state interest for that content-based restriction.

122. Defendants' blanket speech restriction was not narrowly tailored.

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123. Mr. O'Handley has no adequate remedy at law and will suffer serious and irreparable harm to his constitutional rights unless Defendants are enjoined from violating his constitutional rights.

124. Pursuant to 42 U.S.C. §§ 1983 and 1988, Mr. O'Handley is entitled to declaratory relief and temporary, preliminary, and permanent injunctive relief.

125. Mr. O'Handley finds it necessary to engage the services of private counsel to vindicate their rights under the law. Plaintiffs are therefore entitled to an award of attorneys' fees pursuant to 42 U.S.C. § 1988.

Second Claim for Relief

California Constitution art. I § 2 – Free Speech

(By Mr. O'Handley Against All Defendants)

126. Mr. O'Handley incorporates by reference and re-alleges herein all Paragraphs above.

127. In California "[e]very person may freely speak, write and publish his or her sentiments on all subjects, being responsible for the abuse of this right. A law may not restrain or abridge liberty of speech or press." Cal. Const. Art. 1, §2.

128. The California Constitution is more protective, definitive and inclusive of rights to expression and speech than the First Amendment to the United States Constitution.

129. California courts look to whether individuals have been invited to a forum, and if so, the California Constitution protects speech and petitioning even in instances when the venue in which the speech happens is privately owned so long as the speech does not interfere with normal business operations.

130. Courts ask whether the venue is an essential and invaluable forum for the rights of free speech and petition. If so, private property owners will not be permitted to prohibit expressive activity that would impinge on constitutional rights.

131. Twitter regularly invites new users to utilize its speech forum.

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132. Mr. O'Handley's speech did not interfere with Twitter's normal business operations.

133. Twitter is an essential and invaluable forum for the rights of free speech and petition.

134. Twitter, therefore, may not prohibit expressive activity which impinges on constitutional rights.

135. Quashing Mr. O'Handley's speech criticizing election processes and elected officials violates Mr. O'Handley's liberty of speech rights under the California Constitution.

136. Mr. O'Handley has no adequate remedy at law and will suffer serious and irreparable harm to his constitutional rights unless Defendants are enjoined.

137. Mr. O'Handley finds it necessary to engage the services of private counsel to vindicate their rights under the law. Plaintiffs are therefore entitled to an award of attorney fees and costs pursuant to California Code of Civil Procedure Section 1021.5.

Third Claim for Relief

Fourteenth Amendment - Equal Protection Discrimination (42 U.S.C. § 1983)

(By Mr. O'Handley Against All Defendants)

138. Mr. O'Handley incorporates by reference and re-alleges herein all Paragraphs above.

139. Defendants acted to censor Mr. O'Handley's speech with discriminatory intent based on the content of his speech.

140. Defendants' actions bear no rational relation to a legitimate end as Defendants' conduct here was malicious, irrational, or plainly arbitrary.

141. Even if Defendants did have a rational basis for their acts, their alleged rational basis was a pretext for an impermissible motive.

142. Defendants discriminatorily enforced the statute against Mr. O'Handley based on his viewpoint.

143. Defendants' enforcement had a discriminatory effect.

144. Defendants were motivated by a discriminatory purpose.

145. Similarly situated individuals were not censored for their speech.

146. Mr. O'Handley has no adequate remedy at law and will suffer serious and irreparable harm to his constitutional rights unless Defendants are enjoined from violating his constitutional rights.

147. Pursuant to 42 U.S.C. §§ 1983 and 1988, Mr. O'Handley is entitled to declaratory relief and temporary, preliminary, and permanent injunctive relief.

148. Mr. O'Handley finds it necessary to engage the services of private counsel to vindicate their rights under the law. Plaintiffs are therefore entitled to an award of attorneys' fees pursuant to 42 U.S.C. § 1988.

Fourth Claim for Relief

Fourteenth Amendment - Due Process Clause (42 U.S.C. § 1983)

(By Mr. O'Handley Against Defendants California Secretary of State Shirley N. Weber in her official capacity, SKDK, Twitter, Alex Padilla, Paula Valle Castañon, Jenna Dresner, Sam Mahood, and Akilah Jones)

149. Mr. O'Handley incorporates by reference and re-alleges herein all Paragraphs above.

150. Mr. O'Handley had a property interest in pursuing his occupation as a Twitter influencer and commentator.

151. Mr. O'Handley also had a recognized protected interest in his business goodwill.

152. The California Secretary of State, SKDK, Alex Padilla, Paula Valle Castañon, Jenna Dresner, Sam Mahood, and Akilah Jones set in motion a series of acts which they knew or reasonably should have known would cause Twitter to inflict the constitutional injury of depriving Plaintiff of his occupation and taking the business goodwill he had garnered through his Twitter account.

153. OES actions intentionally solicited Twitter to suspend Mr. O'Handley's account.

154. Some kind of hearing is required before depriving Mr. O'Handley either of his occupation or his property interest in his business goodwill.

155. Mr. O'Handley was not given the opportunity to be heard at a meaningful time and in a meaningful manner.

156. Mr. O'Handley has no adequate remedy at law and will suffer serious and irreparable harm to his constitutional rights unless Defendants are enjoined from violating his constitutional rights.

157. Pursuant to 42 U.S.C. §§ 1983 and 1988, Mr. O'Handley is entitled to declaratory relief and temporary, preliminary, and permanent injunctive relief.

158. Mr. O'Handley founds it necessary to engage the services of private counsel to vindicate their rights under the law. Plaintiffs are therefore entitled to an award of attorneys' fees pursuant to 42 U.S.C. § 1988.

Fifth Claim for Relief

Fourteenth Amendment – Void for Vagueness (42 U.S.C. § 1983)

(By Mr. O'Handley Against Defendant California Secretary of State Shirley N. Weber in her official capacity and Defendants Alex Padilla, Paula Valle Castañon, Jenna Dresner, Sam Mahood, and Akilah Jones in their personal capacities)

159. Mr. O'Handley incorporates by reference and re-alleges herein all Paragraphs above.

160. Defendants' enforcement of California Elections Code §10.5 violates the Due Process Clause of the Fourteenth Amendment as-applied to Mr. O'Handley.

161. Mr. O'Handley should not have been punished for behavior he could not have known allegedly violated the law.

162. California Elections Code §10.5 is impermissibly vague because it fails to provide a reasonable opportunity to know what conduct is prohibited or is so indefinite as to allow arbitrary and discriminatory enforcement.

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163. This statute is capable of, and did in fact, reach expression sheltered by the First Amendment, therefore requiring greater specificity.

164. Mr. O'Handley has no adequate remedy at law and will suffer serious and irreparable harm to his constitutional rights unless Defendants are enjoined from violating his constitutional rights.

165. Pursuant to 42 U.S.C. §§ 1983 and 1988, Mr. O'Handley is entitled to declaratory relief and temporary, preliminary, and permanent injunctive relief.

166. Mr. O'Handley finds it necessary to engage the services of private counsel to vindicate their rights under the law. Plaintiffs are therefore entitled to an award of attorneys' fees pursuant to 42 U.S.C. § 1988.

Sixth Claim for Relief

Civil Conspiracy to Interfere with Civil Rights (42 U.S.C. § 1985)

(By Mr. O'Handley Against All Defendants)

167. Mr. O'Handley incorporates by reference and re-alleges herein all Paragraphs above.

168. Defendants had a meeting of the minds to violate the constitutional rights of individuals who questioned election processes and outcomes — or in Defendants' words, spread "misinformation."

169. Defendants, through agreements and processes they jointly created to seek out and swiftly censor speech with which they disagreed, intended to accomplish the unlawful objective of abridging these individuals' freedom of speech.

170. SKDK, Twitter, and NASS joined with the state agents to jointly deprive Mr. O'Handley of his rights.

171. Each conspiracy participant shared the common objective of the conspiracy, to censor speech which they found objectionable or "misleading."

172. As a result of their agreement, Defendants actually deprived Mr. O'Handley of his First and Fourteenth Amendment rights, as described herein.

//

173. Mr. O'Handley suffered economic and reputational injuries, among others, as a result.

174. Mr. O'Handley has no adequate remedy at law and will suffer serious and irreparable harm to his constitutional rights unless Defendants are enjoined from violating his constitutional rights.

175. Pursuant to 42 U.S.C. §§ 1983, 1985, and 1988, Mr. O'Handley is entitled to declaratory relief and temporary, preliminary, and permanent injunctive relief.

176. Mr. O'Handley finds it necessary to engage the services of private counsel to vindicate their rights under the law. Plaintiffs are therefore entitled to an award of attorneys' fees pursuant to 42 U.S.C. § 1988.

PRAYER FOR RELIEF

WHEREFORE, Mr. O'Handley prays this Court grant the relief requested herein, specifically that the Court render the following judgment in Mr. O'Handley's favor and against Defendants:

i. Declaratory Judgment: For entry of a Declaratory Judgment that California Election Code § 10.5, as applied to Mr. O'Handley, violates Mr. O'Handley's state and federal constitutional rights to free speech, equal protection, and due process;

ii. Injunctive Relief: For entry of a Permanent Injunction stating that the Secretary of State and the OEC may not censor speech, work to take down the speech of private speakers, selectively enforce speech restrictions, or discriminate against those who seek to hold the current office holder accountable for perceived defects in election administration;

iii. Damages: general, nominal, statutory (pursuant to Cal. Civ. Code § 52) and exemplary damages, in an amount to be determined at trial;

iv. Attorneys' fees and costs: awarded pursuant to 42 U.S.C. § 1988; California Code of Civil Procedure Section 1021.5; Cal. Civ. Code § 52; and

v. Pursuant to 42 U.S.C. §§ 1983, 1985, and 1988, Plaintiff is entitled to declaratory relief; temporary, preliminary, and permanent injunctive relief invalidating and restraining Defendants' enforcement of California Election Code § 10.5; damages from the businesses and persons sued in their personal capacities; and attorneys' fees.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff demands trial by jury in this action of all issues so triable.

DHILLON LAW GROUP INC.

Date: June 17, 2021

By: /s/ Harmeet K. Dhillon

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Attorneys for Plaintiff ROGAN O'HANDLEY

EXHIBIT 1

pathways to monitor for mis/disinformation online. We have a dedicated email line, voter hotlines, media monitoring tools, contractors, etc. to stay apprised on misinformation and give voters an outlet to report. We always see an influx in misinformation around elections, but this year it was louder than ever.

Given the sheer volume and nature of social media, we at the State level monitor for trends and themes more often than we do individual pieces of misinformation in order to ensure we're countering misinformation with fact-based messaging.

Since September, our office has tracked somewhere around 200 social media/media posts, but our priority is working closely with social media companies to be proactive so when there's a source

of misinformation, we can contain it. It would be difficult to quantify what what reported the MOST, as misinformation surged around different things in the news or events.

Did the Secretary of State's office reach out to any social media companies to help them combat misinformation?

If so, who was contacted, what concerns were expressed and how did the social media company respond?

We have working relationships and dedicated reporting pathways at each major social media company. When we receive a report of misinformation on a source where we don't have a pre-existing pathway to report, we find one. We've found that many social media companies are taking responsibility on themselves to do this work as well.

We worked

closely and proactively with social media companies to keep misinformation from spreading, take down sources of misinformation as needed, and promote our accurate, official election information at every opportunity.

In your opinion did misinformation play an influential role in dissuading voters during this election cycle?

Misinformation led to greater voter anxiety, but it didn't dissuade voters from voting. We saw record breaking numbers across all fronts, including those metrics that indicate a deep desire to vote but a need for more assurance in the process like voting early and signing up for Where's My Ballot to track the status of their ballot throughout the process.

How did the Secretary of State's office deal with misinformation?

EXHIBIT 2

To: Maria Benson[redacted]
Cc: Reynolds, Leslie[redacted] Milhofer, John[redacted]; Lindsey Forson[redacted]; Dodd, Stacy[redacted]
From: Maria Benson[redacted]
Sent: Thur 10/1/2020 7:33:43 AM (UTC-07:00)
Subject: NASS Communications: CIS 1 pager and Twitter updates
EI-ISAC Reporting Misinformation Sheet Final.pdf
8.28.20 Copy of NASS and NASED Twitter Portal List.xlsx

Good Morning Communications Directors,

I wanted to pass along the **attached** one pager on the new CIS single source mis/disinformation reporting channel I updated you on 9/29 (**original email below**).

Twitter also asked me to let you guys know about a couple items…copy/pasted below:

(1) State and Local Election Officials: Please join Twitter on Thursday, October 8 from 3:30 - 4:30 pm EST for a training on creative and effective content strategies on Twitter in advance of the U.S. Election. You will hear the latest on product updates, best practices, and strategy for creating engaging content! Time for Q&A will be reserved at the end. RSVP here: https://trainingforuselectionpartners.splashthat.com/

(2) We are onboarding state and local election officials onto Twitter's Partner Support Portal. The Partner Support Portal is a dedicated way for critical stakeholders -- like you -- to flag concerns directly to Twitter. These concerns can include technical issues with your account and content on the platform that may violate our policies. Email PSPOnboarding@Twitter.com to enroll.

If you do decide to join the PSP please cc' me for awareness. Attached is the last list I have, which I've asked Twitter to cross reference with those they have in their files. But alas, if you'd like to just report to the new CIS reporting structure that works too! Up to you!

Two last things… I bcc'd you all on the press release for the new NASS 2020 Election FAQs but just in case you didn't see it you can find the FAQs here; and today begins National Cybersecurity Awareness Month and American Archives Month.

Onward,

Maria Benson
Director of Communications
National Association of Secretaries of State (NASS)
444 N. Capitol Street NW, Suite 401 | Washington, DC 20001
Desk: 202-624-3528| Cell: [redacted]
www.nass.org

From: Maria Benson
Sent: Tuesday, September 29, 2020 11:40 AM
To: Maria Benson [redacted]
Cc: 'Reynolds' <[redacted]; 'John Milhofer [redacted] Lindsey Forson [redacted]; 'Stacy Dodd' <[redacted]
Subject: NASS Communications: Several Updates

Good Afternoon Communications Directors,

Don't TL;DR at me, but I have several odds and ends updates that I wanted to package together:

NEW Single Source CIS Mis/Disinformation Reporting Email
To help combat misinformation in elections, the EI-ISAC has teamed up with CISA, NASS, NASED, and Stanford University to

EXHIBIT 3

To: Maria Benson[redacted]
Cc: Reynolds, Leslie[redacted]; Minnifer, Jo[redacted]; Lindsey Forson[redacted]; Dodd, [redacted]
From: Maria Benson[redacted]]
Sent: Fri 8/28/2020 9:30:40 AM (UTC-07:00)
Subject: NASS Communications: Mis/disinformation Social Media Platform Reporting Processes
8.28.20 Copy of NASS and NASED Twitter Portal List.xlsx
Twitter portal.PNG

Good Afternoon Communications Directors,

I know I've sent out how to report mis/disinformation to social media platforms before, but a few things have changed and Tik Tok is new to our game. Please, please, please take a look at these carefully, save it somewhere you'll remember, also print it out and duct tape/super glue it to something next to your computer **

Facebook/Instagram

- Send an email to reports@content.facebook.com and your Facebook point of contact; include "election issue" in subject line. Please include as much information as possible: screenshots, profile names, links, descriptions of what is incorrect, etc. The more information you include, the more likely Facebook will be able to act on it.
- Content that should be reported is:
  - Any content containing statements of intent, calls for action, or advocating for violence due to voting, voter registration, or the outcome of an election.
  - Any offers to buy or sell votes with cash or gifts.
  - Misrepresentation of the dates, locations, and times, and methods for voting or voter registration.
  - Misrepresentation of who can vote, qualifications for voting, whether a vote will be counted, and what information and/or materials must be provided in order to vote.

- **Facebook Regional Contacts (which are newly updated):**
  - Jannelle Watson ([redacted])
    - AZ, CO, IA, KS, NE, NM, NV, OK, TX, UT
  - Khalid Pagan ([redacted])
    - CT, DC, DE, MA, MD, ME, NH, NJ, NY, PA, RI, VT,
  - Tracy Rohrbach ([redacted])
    - IL, IN, MI, MN, ND, OH, SD, WI
  - Cristina Flores ([redacted])
    - CA and the US territories
  - Rachel Holland ([redacted])
    - AL, AR, FL, GA, KY, LA, MO, MS, NC, SC, TN, VA, WV
  - Eva Guidarini [redacted])
    - AK, HI, ID, MT, OR, WA, WY

Twitter

- If your state is onboarded into the partner support portal, it provides a mechanism to report election issues and get them bumped to the head of the queue. Fill in the report with as much information as possible, including links if you have them. **Attached** is a list of the 38 on-boarded states.
  - If you're **not** on the list and would like to get on-boarded please email psponboarding@twitter.com, cc' gov@twitter.com and me for my awareness. These lists don't keep themselves **
- Here's the link https://help.twitter.com/forms to get started to report mis/disinfo.
  - You should have a green box at the top. **Attached** is a screenshot from my screen.
  - Then to report you click submit form. Then regarding and choose "integrity." It used to say election integrity, but with COVID-19 they changed it just to integrity.
    - Let me know if yours doesn't have those features.
- NEW: Local election officials' Twitter accounts can now be onboarded into the partner support portal by emailing psponboarding@twitter.com, so please pass along to your locals. Please email gov@twitter.com if you have questions 1/1 about this since it is so new.

EXHIBIT 4

To: Jimenez, Jerry[redacted]; Grambusch, Claire[redacted]; Lansley, Susan[redacted]; Reyes, Steve[redacted]; Valle, Paula[redacted]
From: Mahood, Sam[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5ADE179F920245A594801E1F9BC7464F-MAHOOD, SAM]
Sent: Tue 4/30/2019 9:22:39 AM (UTC-07:00)
Subject: Fw: NASS Communications: Reporting Social Media Mis/Disinformation

Jerry, Claire, Susan, Steve,

Please see this email from NASS about reporting social media misinformation to various social media platforms.

-Sam

From: Maria Benson[redacted]>
Sent: Tuesday, April 30, 2019 9:19 AM
To: Maria Benson
Cc: Reynolds, Leslie; Milhofer, John; Dodd, Stacy; Lindsey Forson
Subject: NASS Communications: Reporting Social Media Mis/Disinformation

Good Afternoon Communications Directors,

We all know that mis/disinformation on social media does not disappear when we aren't running major elections. If you see something on a platform, please report it. In addition, please pass this on to your local election officials as well. **I would also appreciate a heads up so I know what is going on, this helps us create a more national narrative.**

Reporting mechanisms currently in place:

Facebook

Send email to reports@content.facebook.com; copy Eva Guidarini ([redacted]) and your state Facebook representative; include "election mis/disinformation" or something similar in subject line. Identify specific pieces of content that potentially violate their voter fraud and suppression policy using links to content on FB; if you believe pages or profiles are inauthentic, send links to pages or profiles. If there is a statute or regulation on point (e.g., if misrepresentation concerns voting requirements), please include that information in email.

Twitter

To report something, Twitter has an election partner portal which NASS has access to. You will need to email me ([redacted]) as much information as you have and I will submit it through the portal as soon as possible, including Twitter handle, tweet content, link, why you believe it is mis/disinformation, etc. I will also include your contact information in the report so Twitter can get back to you about it directly.

Google

When there is a question about the legality of an election advertisement or how it falls under a Google policy, please

EXHIBIT 5

To: Mahood, Sam[redacted]
Cc: Reyes, Steve[redacted], Valle, Paula[redacted]
From: Kevin Kane[redacted]
Sent: Tue 12/31/2019 7:51:23 AM (UTC-08:00)
Subject: Re: Fw: Case# 0136918935: partner_election [ref:00DA0000000K0A8.5004A00001qaD26:ref]

Sam-

Thank you for reporting, this Tweet has been removed. Please don't hesitate to contact me if there is anything else we can do.

Best regards,

Kevin

On Mon, Dec 30, 2019 at 9:05 PM Mahood, Sam <[redacted]> wrote:

> Hi Kevin,
>
> Flagging the following tweet that I reported through the partner portal. This tweet is sharing a doctored image of a California Voter Registration Card (inaccurately claiming that the Republican Party is not an option):
> https://twitter.com/Paul_USAPatriot/status/1211709756311621633
>
> We would like this tweet taken down ASAP to avoid the spread of election misinformation.
>
> Please let us know if there is anything else we can do to facilitate this request.
>
> Thank you,
>
> -Sam
>
> Sam Mahood - Press Secretary, California Secretary of State Alex Padilla
> [redacted]

From: Twitter Support <support@twitter.com>
Sent: Monday, December 30, 2019 6:02 PM
To: Mahood, Sam [redacted]
Subject: Case# 0136918935: partner_election [ref:00DA0000000K0A8.5004A00001qaD26:ref]

Hello,

This is a confirmation that we've received your request. Someone from our team will review it and reply to you shortly.

Thanks,

Twitter Support
ref:00DA0000000K0A8.5004A00001qaD26:ref

EXHIBIT 6

To: Valle, Paula [redacted]; Dresner, Jenna [redacted]; Mahood, Sam [redacted]; Jones, Akilah [redacted]
Cc: Heather Wilson [redacted]; Emily Campbel [redacted]; Jason Rosenbaum [redacted]; Tania Mercado [redacted]; Grace Gill [redacted] Julia Schechter [redacted]
From: Zeke Sandova [redacted]
Sent: Fri 11/13/2020 4:43:28 PM (UTC-08:00)
Subject: Misinformation Daily Briefing: 11/13

Weekly Recap:

On Monday 11/9 @ErrolWebber tweeted, "George Bush was declared December 15th. It is only the 1st week of November now. Be patient. PRESIDENT TRUMP WON!" The post has been flagged as misleading by Twitter.

On Tuesday 11/10 The New York Times reported that tech companies are struggling to keep up and identify false claims that Joe Biden lost in Pennsylvania, the state that put him over the 270 electoral vote threshold.

On Wednesday 11/11 Forbes reported Facebook's ban on political ads will continue for at least another month. The 2020 election results will not be certified until the middle of December.

On Thursday 11/12 @realDonaldTrump tweeted, "REPORT: DOMINION DELETED 2.7 MILLION TRUMP VOTES NATIONWIDE. DATA ANALYSIS FINDS 221,000 PENNSYLVANIA VOTES SWITCHED FROM PRESIDENT TRUMP TO BIDEN. 941,000 TRUMP VOTES DELETED. STATES USING DOMINION VOTING SYSTEMS SWITCHED 435,000 VOTES FROM TRUMP TO BIDEN." @ChanelRion@OANN." The tweet has been flagged by Twitter.

National

CNN reported the Trump campaign has eliminated their voter fraud hotline after it was flooded with prank calls. The campaign is yet to provide evidence of widespread voter fraud.

@realDonaldTrump tweeted, "For years the Dems have been preaching how unsafe and rigged our elections have been. Now they are saying what a wonderful job the Trump Administration did in making 2020 the most secure election ever. Actually this is true, except for what the Democrats did. Rigged Election!"

Breitbart published a report by Tom Fitton in which the conservative activist claims to have exposed massive voter fraud across the country.

The New York Times warned that the term election fraud is becoming more popular in some circles. The Times concluded that "The Rush Limbaugh Show," which averages about 15 million listeners per week, has mentioned the term 204 times since Election Day.

California:

@RealErinCruz tweeted, "Story after story of votes wrongly allocated, some individuals being told they already electronically voted when they were trying to relinquish their mail in ballot at voting assistance centers so they could vote in person... We need a FULL AUDIT. I'm not stopping. #CA36," along with a video of a computer programmer claiming he was hired to rig an election.

ABC News included President Trump's tweet about ballots being illegally collected in CA after the election on their list of debunked election misinformation. The ballot box was sealed on Election Day, meaning all ballots inside were eligible to be counted.

NBC 4 reported the Orange County registrar is conducting an audit of local election results in search of possible errors. The audit is not required by law but is tradition.

@DC_Draino tweeted, "Audit every California ballot Election fraud is rampant nationwide and we all know California is one of the culprits Do it to protect the integrity of that state's elections."

The Daily Breeze published an opinion piece calling expanded mail voting an "electoral success." The piece claims that both Democrats and Republicans benefited from the change.

@WatchTheBreaks tweeted, "Just did some research on California voting and unless I'm missing something, there isn't a place I can see HOW my

ballot was counted. I think that inability for me to check my Votes in the system (not just IF it was counted) is a big flaw, regardless of which side you are on."

Narrative:

@SteveHiltonx tweeted, ""The Democratic strategy...was to get rules in place that would allow them to flood the zone with additional mail-in ballots...the beauty of ballot harvesting is that it's nearly impossible to prove fraud" @KimStrassel details Democrats' systemic meddling," along with a link to a Wall Street Journal opinion piece that contains the quote.

Fox News reported that Nikki Haley is attacking Twitter for labeling her tweet as potentially misleading while ignoring other problematic posts.

Sputnik News reported that dead people receiving ballots could be the tip of the iceberg in terms of voter fraud in the United States. The piece calls ballot harvesting a potential avenue for voter fraud in the election process. The outlet is owned by the Russian government.

@SteveHiltonx tweeted, "Ballot Harvesting...voter rolls "plagued with errors" (Pew)...a patchwork of dodgy technology...regardless of the impact on any party or candidate America clearly has the voting system of a banana republic or late 19th century big city political machine Investigate and Reform!"

Questions:

What is the difference between a vote recount and a vote audit? - from Quora

Was there really widespread election fraud? How many votes are we talking about? What evidence exists other than highly skewed vote counts late in the process? - from Quora

What evidence is out there to prove that Joe Biden committed fraud? - from Quora

Stories about voting twice topped 400 for the fourth consecutive day. People voting twice has been a favorite claim of individuals trying to undermine the legitimacy of the election.

###

EXHIBIT 7

NASS 2020 IDEAS Award

VoteSure: A Public Education Campaign Encouraging Voters to be Vigilant of Election Misinformation

California Secretary of State's Office

Subject Area of Nomination: Cybersecurity

Cyber threats to our elections are the new normal. In 2016, federal intelligence officials were unanimous in their conclusion that foreign actors interfered in the U.S. Presidential Election. In response, with the support of California's Governor and Legislature, the California Secretary of State's office developed innovative safeguards, including a public education campaign, to secure our elections. Launched in October 2018, VoteSure counteracted misinformation, provided public education resources, and bolstered confidence in our elections. VoteSure was the first-of-its-kind public education initiative launched by a Secretary of State's office.

Project Lead:

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Chief Communications Officer
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VOTE CALIFORNIA
www.registertovote.ca.gov

VoteSure: A Public Education Campaign Encouraging Voters to be Vigilant of Election Misinformation

Background
For the first time in the history of California, the Legislature and Governor approved a public education and outreach budget for the California Secretary of State's office, specifically designated for communicating accurate election information to California voters. This came at a critical time when federal intelligence agencies were unanimous in their assessment that foreign governments targeted California and other states with sophisticated misinformation campaigns on social media that were confusing to voters.

This funding approved in fiscal year 2018-2019 enabled the California Secretary of State's office to employ additional tools and resources necessary to identify misinformation and create content to provide voters, particularly in hard-to-reach communities, access to information about California Secretary of State programs via verified websites. The target population, of these educational campaigns, was estimated at 19.4 million at the last report of registration.

Our office identified email communication with California voters as one of the primary areas where we could be effective in addressing misinformation as well as providing proactive accurate, reliable and verified information. As such, we secured a contract with Granicus to ensure that we had the ability to email and distribute, as well as text message, all registered voters in California that provided email addresses in their voter registration forms. While not all registered voters provide emails and/or phone numbers, a vast majority do.

Having the ability to email voters statewide should a major incident occur is essential to our responsibility as the state's chief elections office. For example, if there is a coordinated misinformation campaign that targets a county or precinct, we are now able to use an email management system to communicate accurate information to voters.

In addition to these outreach and educational tools, the Offices of Election Cybersecurity and Enterprise Risk Management were created to develop strategies for communicating elections information and mitigating potential risks to the California Secretary of State security infrastructure.

The Office of Election Cybersecurity created VoteSure, which was a first-of-its-kind public education initiative to promote trusted, accurate, and official sources of election information on Facebook, Instagram, and Twitter. The goal of VoteSure was to increase voter awareness about election misinformation online and provide official, trusted election resources.

The Office of Election Cybersecurity utilized Facebook, Instagram and Twitter's software to communicate accurate information to voters across the state, which increased and enhanced the outreach and civic engagement by the Secretary of State's office ahead of Election 2018. The software and analytics provided by these social media channels enabled the Secretary of State's office to provide real-time reports and data, which helped fine tune our target messaging more appropriately for our communication and outreach efforts.

Election security continues to be a top priority for the Secretary of State's office, and we are continuing to work around the clock to protect the integrity of our systems ahead of Election 2020 and to combat misinformation through our Office of Election Cybersecurity.

The Campaign: VoteSure

Public Education:
The VoteSure campaign included paid advertisements on Twitter, Facebook and Instagram. These paid advertisements included graphics about misinformation and official Election Day information. A series of videos encouraged voters to report misinformation at **cybersecurity.sos.ca.gov** and to visit **VoteSure.sos.ca.gov** to obtain official election information straight from the source. The new **VoteSure.sos.ca.gov** portal was created to inform the public about efforts being taken to protect elections. It included links to help voters look up their voter registration status, find their polling place and early voting opportunities, and learn about their rights as voters.

On Election Day, November 6, 2018, the #VoteSure hashtag was included alongside several informational graphics that encouraged early voting and a link to the Voter Bill of Rights on Facebook and Twitter.

Statewide Outreach:
As part of the VoteSure initiative, around 6 million voters who included an email address with their voter registration received an email communication with election information directly from the California Secretary of State's office. This electronic campaign was the first time the California Secretary of State's office directly emailed registered voters. Due to the very positive feedback, the California Secretary of State's office plans on making this a standard method for disseminating information.

Monitoring and Countering Misinformation:
The Office of Election Cybersecurity worked with state, local, and federal agencies to share information about cyber threats, develop emergency preparedness plans, and recommend ways to protect election infrastructure. This included piloting a new social media monitoring effort in the days leading up to and on Election Day. Posts spreading false information such as "vote online," "provisional ballots don't count," or "Democrats vote on 7/6 and Republicans vote on 7/7," were reported to officials at Facebook and Twitter.

Voters could also participate with monitoring by reporting suspicious content or election misinformation found on social media directly to a VoteSure email inbox. These posts would be reviewed by the Office of Election Cybersecurity and in most cases reported to the social media company so they could be removed.

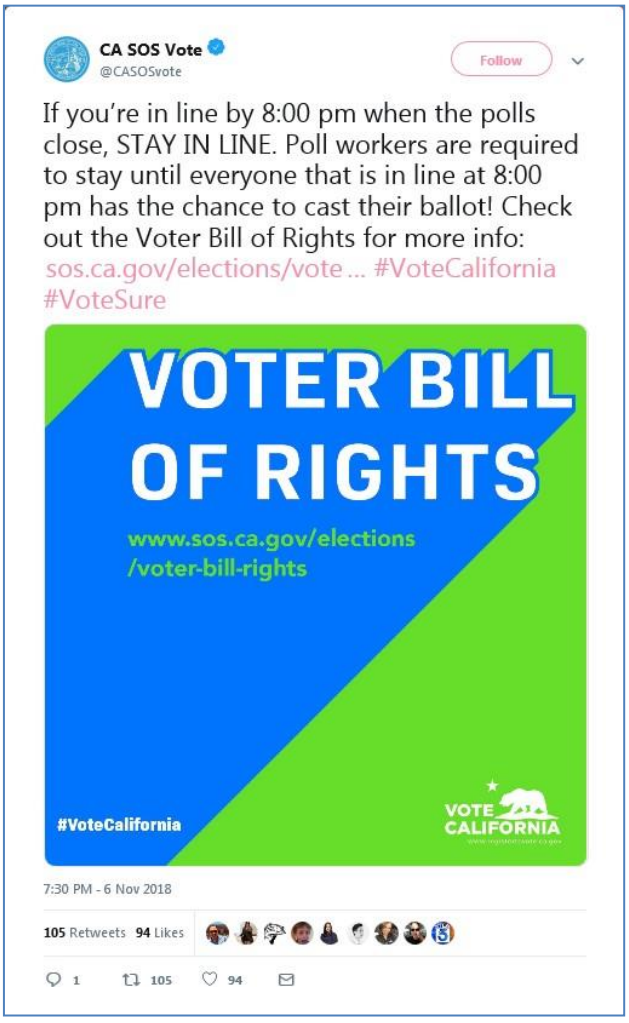
Results
In total, the VoteSure initiative targeted all Californians over the age of 18 and made 46 million impressions on Facebook and Twitter. Using the election portal, **VoteSure.sos.ca.gov**, voters were able to easily verify their registration status, find their polling place or report election misinformation.

The Office of Election Cybersecurity discovered nearly 300 erroneous or misleading social media posts that were identified and forwarded to Facebook and Twitter to review and 98 percent of those posts were

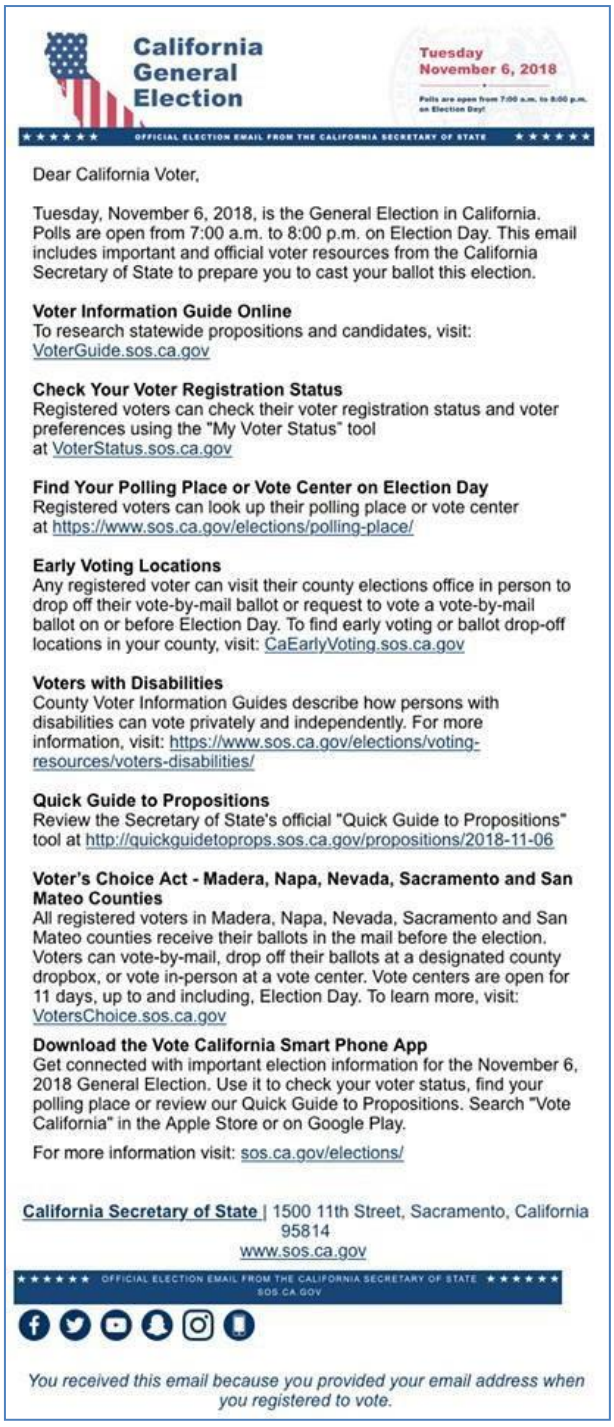
promptly removed for violating the respective social media company's community standards.

Voters turned out to the polls on Election Day in record numbers. Approximately 12 million Californians cast their ballot on November 6, 2018. That's a 60 percent turnout— the highest level of participation in a midterm election since 1982.

Supporting Documents: Social Media Graphics and Posts



Supporting Documents: VoteSure Email and Website



California General Election

Tuesday November 6, 2018

Polls are open from 7:00 a.m. to 8:00 p.m. on Election Day!

OFFICIAL ELECTION EMAIL FROM THE CALIFORNIA SECRETARY OF STATE

Dear California Voter,

Tuesday, November 6, 2018, is the General Election in California. Polls are open from 7:00 a.m. to 8:00 p.m. on Election Day. This email includes important and official voter resources from the California Secretary of State to prepare you to cast your ballot this election.

Voter Information Guide Online
To research statewide propositions and candidates, visit: VoterGuide.sos.ca.gov

Check Your Voter Registration Status
Registered voters can check their voter registration status and voter preferences using the "My Voter Status" tool at VoterStatus.sos.ca.gov

Find Your Polling Place or Vote Center on Election Day
Registered voters can look up their polling place or vote center at https://www.sos.ca.gov/elections/polling-place/

Early Voting Locations
Any registered voter can visit their county elections office in person to drop off their vote-by-mail ballot or request to vote a vote-by-mail ballot on or before Election Day. To find early voting or ballot drop-off locations in your county, visit: CaEarlyVoting.sos.ca.gov

Voters with Disabilities
County Voter Information Guides describe how persons with disabilities can vote privately and independently. For more information, visit: https://www.sos.ca.gov/elections/voting-resources/voters-disabilities/

Quick Guide to Propositions
Review the Secretary of State's official "Quick Guide to Propositions" tool at http://quickguidetoprops.sos.ca.gov/propositions/2018-11-06

Voter's Choice Act - Madera, Napa, Nevada, Sacramento and San Mateo Counties
All registered voters in Madera, Napa, Nevada, Sacramento and San Mateo counties receive their ballots in the mail before the election. Voters can vote-by-mail, drop off their ballots at a designated county dropbox, or vote in-person at a vote center. Vote centers are open for 11 days, up to and including, Election Day. To learn more, visit: VotersChoice.sos.ca.gov

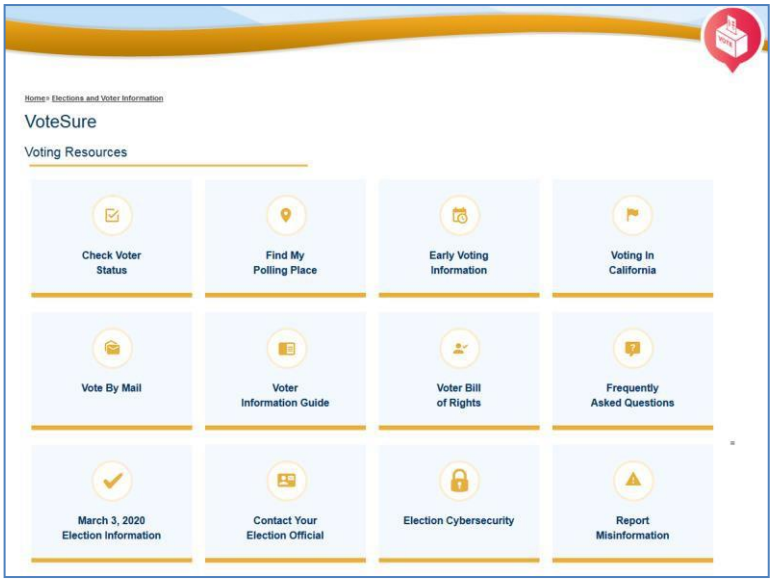
Download the Vote California Smart Phone App
Get connected with important election information for the November 6, 2018 General Election. Use it to check your voter status, find your polling place or review our Quick Guide to Propositions. Search "Vote California" in the Apple Store or on Google Play.

For more information visit: sos.ca.gov/elections/

California Secretary of State | 1500 11th Street, Sacramento, California 95814
www.sos.ca.gov

OFFICIAL ELECTION EMAIL FROM THE CALIFORNIA SECRETARY OF STATE
SOS.CA.GOV

You received this email because you provided your email address when you registered to vote.



Home > Elections and Voter Information

VoteSure

Voting Resources

- Check Voter Status
- Find My Polling Place
- Early Voting Information
- Voting In California
- Vote By Mail
- Voter Information Guide
- Voter Bill of Rights
- Frequently Asked Questions
- March 3, 2020 Election Information
- Contact Your Election Official
- Election Cybersecurity
- Report Misinformation

Informational Videos

VoteSure California- 1

https://www.youtube.com/watch?v=SOWhM_qYBo4

VoteSure California- 2

https://www.youtube.com/watch?v=51t04gr1Yjg

EXHIBIT 8

ALEX PADILLA
California Secretary of State

AP20:067

FOR IMMEDIATE RELEASE
July 23, 2020
CONTACT:
SOS Press Office
(916) 653-6575

National Association of Secretaries of State Presents California Secretary of State with 2020 IDEAS Award

SACRAMENTO, CA – The National Association of Secretaries of State (NASS) presented the 2020 IDEAS (Innovation, Dedication, Excellence and Achievement in Service) Award to the Office of the California Secretary of State for California's VoteSure program. This award recognizes significant state contributions to the mission of NASS.

The VoteSure program, launched in October 2018, is a statewide public education campaign to increase voter awareness about election misinformation online and provide official, trusted election resources. The campaign included the launch of **VoteSure.sos.ca.gov**, a web portal that consolidates important voter resources.

California Secretary of State Alex Padilla said this about the VoteSure program receiving the NASS IDEAS Award:

“Bad actors — both foreign and domestic — continue to threaten our elections and elections officials must be more proactive and innovative in strengthening voter confidence. In response, California launched VoteSure, the first initiative of its kind in the nation to both promote official, trusted sources of election information while countering election misinformation on social media.

"VoteSure strategically placed social media ads aimed at directing voters to official elections tools, information, and resources. Other ads explained the various security measures in place that protect the integrity of our elections. The initiative also included proactive social media monitoring for election misinformation and provided voters a dedicated email address to report suspicious posts. We worked in partnership with social media platforms to develop more efficient reporting procedures for potential misinformation. Misinformation identified by our office or voters was promptly reviewed and, in most cases, removed by the social media platforms.

"This era demands swift communication campaigns to respond to emerging threats. Despite the threats and misinformation, a record number of Californians cast their ballots in the November 2018 midterm election. I’m proud of the California Secretary of State staff and of California voters

who helped make VoteSure an immediate success, and I am thankful for my colleagues' recognition of our work in California."

The award was voted on by members of NASS and announced by NASS Awards Committee co-chair and North Dakota Secretary of State Al Jaeger during the NASS 2020 Virtual Summer Conference Business Meeting on July 22, 2020.

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EXHIBIT 9

Platform	Date of Post	Time of Post	Screenshot/Text/Link	Misinformation	Indicator	Tracking Number	Date Reported	Time Reported	Reporting Details	Social Media Action Taken	Result	Date Removed	Time Removed	
Citizen	10/2/2020	N/A		Election Misinformation from Citizen App.	Incorrect Election Information		10/2/20	4:45 PM	A user of the Citizen app called our hotline to report that she had received an alert titled California Election Center. She reported, the post has incorrect information regarding the Election, particularly the date of the Election.	Post removed.	Removed	10/2/20	7:48 PM	
Facebook	9/16/20	5:58 AM		Screenshot: i'll vote for biden if one of his supporters sends me $500 dollars. if you're a biden supporte and decide to not send me $500 you're voting for trump. www.facebook.com/1488685372/posts/10217971982599681/?extid=zvXstmDOKWte5PmE&	Solicitation	N/A	9/18/20	11:00 AM	Please see images attached. There is a thread we're reporting on Twitter - that's been screen shot and is circulating on Facebook. Facebook's notes reportable content as: any offers to buy or sell votes with cash or gifts so flagging with you as well in hopes of limiting its spread. It is a crime under state and federal law to solicit and or receive any consideration/money in exchange for voting, voting for someone, or not voting for someone.	Facebook removed post.	Removed	9/18/20	12:10 PM	
Facebook	10/31/2020	N/A		I'm a member of a private Facebook group for rideshare drivers in the SF Bay area. A user going by "DC O'Bryan" claims to have obtained, and implies having voted, multiple ballots with the aim of defeating Proposition 22. In a reply to a comment on the post, the user says it's "not like [they] registered [their] dogs to get extra ballots." I don';t know whether all of it is just foolish hot air meant to provoke. If it is, a call from an official might get the point across that you don't joke about election fraud. If it's not, and they're really stupid enough to write about criminal behavior online, then please see that they're prosecuted. Screenshots viewable here: photos.app.goo.gl/jv6EGZQTbHdNHv4r7 Permanent link to the post: www.facebook.com/groups/sfuberdrivers/permalink/3167691863343122/"	Voting Twice	N/A	11/1/2020	12:00 PM	Wanted to alert you to the following Facebook post where a user implies having voted with multiple ballots (screenshots attached). While we investigate internally, we recommend it be taken down as it is a misrepresentation of legal methods for voting. Report: "I'm a member of a private Facebook group for rideshare drivers in the SF Bay area. A user going by "DC O'Bryan" claims to have obtained, and implies having voted, multiple ballots with the aim of defeating Proposition 22. In a reply to a comment on the post, the user says it's "not l ke [they] registered [their] dogs to get extra ballots." I don';t know whether all of it is just foolish hot air meant to provoke. If it is, a call from an official might get the point across that you don't joke about election fraud. If it's not, and they're really stupid enough to write about criminal behavior online, then please see that they're prosecuted. Screenshots viewable here: photos.app.goo.gl/jv6EGZQTbHdNHv4r7 Permanent link to the post: www.facebook.com/groups/sfuberdrivers/permalink/3167691863343122/"	Post removed.	Removed	10/31/20	2:10 PM	
Instagram	10/28/2020	12:00 AM		In the post voters are being asked to gerrymander and voter suppress their "trump supporting father's ballots". This is a clear example of voter suppression and we are concerned about the spread of misinformation this may cause as well as the distrust in the voting process and security of ballots this may present as well. Purposefully losing or destroying and keeping someone from exercising their right to vote is a crime. https://www.instagram.com/p/CG0ax-YA0Ms/	Voter Suppression	Emailed	10/29/20	12:20 PM	We want to flag this Instagram post from: @Screenplaywale. In the post voters are being asked to gerrymander and voter suppress their "trump supporting father's ballots". This is a clear example of voter suppression and we are concerned about the spread of misinformation this may cause as well as the distrust in the voting process and security of ballots this may present as well. Purposefully losing or destroying and keeping someone from exercising their right to vote is a crime.	Post removed.	Removed	10/28/20	3:27 PM	
Instagram	9/17/2020	9:00:00 AM		Vote-by-Mail Registration. #recallnewsom. Doing our duty. Draining the swamp. Former actress claims all CA voters are now permanently vote-by-mail in video https://www.instagram.com/p/CFQqnFMDSbR/	Permanent VBM	N/A	9/21/20	12:00 PM	We wanted to flag this Instagram post: https://www.instagram.com/p/CFQqnFMDSbR/ from user @Samaire.xoxo. In the video - the participants claim that Gavin Newsom changed everyone's voting status to automatic, permanent mail in votes. We are concerned for the spread of this misinformation as it already has upwards of 40K views. The truth is that because of COVID-19, California passed a law to send every active, registered voter a vote-by-mail ballot for the November 3rd election, and only the November 3rd election. This does not change individuals voter preferences permanently and this misrepresentation of the method to vote/register this year has the potential for voter suppression and confusion.	Instagram removed post.	Removed	9/21/20	12:50 PM	
Instagram	9/1/20	N/A		The post claims that the voting preference of California voters has been changed by Governor Newsom. This is incorrect. Earlier this year, Governor Newsom issued an executive order that directed California's counties to send every active, registered voter a vote-by-mail ballot ahead of the November 3, 2020 General Election. This Executive Order was followed up by AB860, which was signed into law by Governor Newsom. This order only pertains to the November 3, 2020 General Election. The permanent voting preference of voters has not been changed. There will also be in-person voting options available to any Californian voter that would like to vote in-person.	Permanent VBM	N/A	8/31/20	2:33 PM	I would l ke to report this post because it claims that the voting preference of California voters has been changed by Governor Newsom. This is incorrect. Earlier this year, Governor Newsom issued an executive order that directed California's counties to send every active, registered voter a vote-by-mail ballot ahead of the November 3, 2020 General Election. This Executive Order was followed up by AB860, which was signed into law by Governor Newsom. This order only pertains to the November 3, 2020 General Election. The permanent voting preference of voters has not been changed. There will also be in-person voting options available to any Californian voter that would like to vote in-person.	I wanted to circle back and say the post has been deleted.	Removed	8/31/2020	4:16 PM	
Twitter	11/12/2020	6:20:00 PM	Audit every California ballot. Election fraud is rampant nationwide and we all know California is one of the culprits. Do it to protect the integrity of that state's elections https://twitter.com/DC_Draino/status/1327073866578096129	Voter Fraud. Audit every California ballot. Election fraud is rampant nationwide and we all know California is one of the culprits. Do it to protect the integrity of that state's elections	Voter Fruad	Case# 0180994675: partner_election [ref:00DA0000000K0A8.5004w0000225CNh:ref]	11/17/20	12:31 PM	Hi, We wanted to flag this Twitter post: https://twitter.com/DC_Draino/status/1327073866578096129 From user @DC_Draino. In this post user claims California of being a culprit of voter fraud, and ignores the fact that we do audit votes. This is a blatant disregard to how our voting process works and creates disinformation and distrust among the general public.	Twitter flagged as misinformation.	Removed			
Twitter	10/31/2020			This post lies about voter registration procedures, diminishing trust in our elections and threatening elections integrity. " https://twitter.com/RoxieCorleone/status/1322366549835964416 "	Voter Registration	Case# 0178813767	10/31/2020	12:36 PM	Reporting details: https://twitter.com/RoxieCorleone/status/1322366549835964416 This post lies about voter registration procedures, diminishing trust in our elections and threatening elections integrity.	Twitter locked account	Removed	11/1	1:43 AM	
Twitter	10/6/2020	7:20:00 AM	The coming California voting disaster CA is facing: • Millions of inactive voters receiving ballots • USPS alarm not all ballots will be received on time • Voter fraud as seen by the homeless br bing Prepare yourself for what is coming My latest. https://twitter.com/CaliConsNews/status/1313484215045025792	VBM Errors. The coming California voting disaster CA is facing: - Millions of inactive voters receiving ballots - USPS alarm not all ballots will be received on time - Voter fraud as seen by the homeless br bing Prepare yourself for what is coming My latest	VBM Error	Case# 0175871430: partner_election [ref:00DA0000000K0A8.5004A000020IIsm:ref]	10/8/20	4:28 PM	Hello, I'd like to report this tweet: https://twitter.com/CaliConsNews/status/1313484215045025792 Tweet provides misinformation about California ballots will all have errors due to registered voters receiving mail ballots.	After our review, we've locked the account for breaking our rules regarding civic integrity. Please keep in mind, the account owner does have the option to take the actions we've requested to have their account unlocked. This can include deleting the Tweets that violated the rules, or updating specific account information.	Removed	10/9	1:10 AM	
Twitter	10/7/2020	9:12:00 AM	A system of mass mail outs does not work as there are many mistakes and high potential for fraud. This is especially evident in blue states because Democrats have terr ble leadership and love to cheat. https://twitter.com/moll1021/status/1313874739903954949	VBM Fraud. A friend I'm staying with in California received two (2) ballots in the mail. A system of mass mail outs does not work as there are many mistakes and high potential for fraud. This is especially evident in blue states because Democrats have terrible leadership and love to cheat.	VBM Fraud	Case# 0175871659: partner_election [ref:00DA0000000K0A8.5004A000020IIsE:ref]	10/8/20	4:30 PM	Hello, I'd like to report this tweet: https://twitter.com/moll1021/status/1313874739903954949 Tweet provides misinformation about California ballots will all have errors due to registered voters receiving mail ballots. And also states a system of mass mail outs does not work as there are many mistakes and high potential for fraud. This is especially evident in blue states because Democrats have terrible leadership and love to cheat.	After our review, we've locked the account for breaking our rules regarding civic integrity. Please keep in mind, the account owner does have the option to take the actions we've requested to have their account unlocked. This can include deleting the Tweets that violated the rules, or updating specific account information.	Removed	10/9	1:14 AM	
Twitter	9/27/2020	7:36:00 PM	Tweets falsely alleges ballots were found in Sonoma dumpster - does not mention they were recycled materials from 2018. https://twitter.com/sandyleevincent/status/1310407902511935488	Ballot Collection/Harvesting. Tweet baselessly claims Orange County votes were fraudulent in 2018. 343 RTs, 678 likes as of 10:25am 9/28.	Ballot Collection	Case# 0174777320: partner_election [ref:00DA0000000K0A8.5004A000020OfCF:ref]	9/29/20	11:58 AM	Tweet provides misinformation about California ballots will all have errors due to registered voters receiving mail ballots.	Twitter removed post.	Removed	9/29	1:47 PM	

Platform	Date of Post	Time of Post	Screenshot/Text/Link	Misinformation	Indicator	Tracking Number	Date Reported	Time Reported	Reporting Details	Social Media Action Taken	Result	Date Removed	Time Removed	
Twitter	9/26/2020	12:52:00 PM	California! You need to check your voting registration NOW. (Along with a video that falsely claims all Californians have been moved to permanent vote by mail). https://twitter.com/intheMatrixxx/status/1309943907413827587	Vote-by-Mail Registration. Twitter video falsely claims all CA voters have been moved to permanent vote-by-mail. 455 RTs, 481 likes as of 7:38pm 9/26.	Permanent VBM	Case# 0174780252: partner_election [ref:00DA0000000K0A8.5004A0000020Og94:ref]	9/29/20	12:31 PM	Hello, I'd like to report this tweet: https://twitter.com/intheMatrixxx/status/1309943907413827587 Tweets falsely claim all CA voters have been moved to permanent vote-by-mail and tweet wrongly asserts that Gov. Newsom unilaterally decided to mail ballots to all voters.	Twitter removed post. After our review, we've locked the account for breaking our rules regarding civic integrity. Please keep in mind, the account owner does have the option to take the actions we've requested to have their account unlocked. This can include deleting the Tweets that violated the rules, or updating specific account information.	Removed	10/6	12:08 AM	
Twitter	9/26/2020	5:44:00 AM	In my State of California, my Governor, Nancy Pelosi's nephew, by executive order unilaterally change voting law and mandated, "All voters will be mailed a ballot" What in California's constitution gives him authority to make law? We have a legislative body. Unconstitutional? https://twitter.com/alaphiah/status/1309836193907965953	Vote-by-Mail Registration. Tweet wrongly asserts that Gov. Newsom unilaterally decided to mail ballots to all voters. 90 RTs, 109 likes as of 7:40pm 9/26.	Permanent VBM	Case# 0174780825: partner_election [ref:00DA0000000K0A8.5004A000020OgUG:ref]	9/29/20	12:37 PM	Hello, I'd like to report this tweet: https://twitter.com/alaphiah/status/1309836193907965953 Tweets falsely claim all CA voters have been moved to permanent vote-by-mail and tweet wrongly asserts that Gov. Newsom unilaterally decided to mail ballots to all voters.	Twitter removed post. After our review, we've locked the account for breaking our rules regarding civic integrity. Please keep in mind, the account owner does have the option to take the actions we've requested to have their account unlocked. This can include deleting the Tweets that violated the rules, or updating specific account information.	Removed	10/6	12:09 AM	
Twitter	9/25/20	9:42 AM	California Man Finds THOUSANDS of What Appear to be Unopened Ballots in Garbage Dumpster —Workers Quickly Try to Cover Them Up Last night we received these photos from a reader in Petaluma, Ca. My dad was throwing away trash and saw them took pictures https://twitter.com/darhar981/status/1309533853967671297	California Man Finds THOUSANDS of What Appear to be Unopened Ballots in Garbage Dumpster —Workers Quickly Try to Cover Them Up Last night we received these photos from a reader in Petaluma, Ca. My dad was throwing away trash and saw them took pictures	Sonoma County	Case# 0174581693: partner_election [ref:00DA0000000K0A8.5004A000020NZZr:ref]	9/27/20	8:05 PM	Hello, I'd like to report this tweet: https://twitter.com/darhar981/status/1309533853967671297 This is a story being circulated on social media about ballots being thrown out in Sonoma County. This is a dangerous lie - Sonoma County has explained that they were empty envelopes and other election materials from the 2018 election, that were disposed of per their retention schedule. They were not in any way related to the current election. They were sent to processing immediately and are no longer accessible. This misinformation perpetuates a narrative about fraud in our elections that leads to voter suppression of voters who are misled to believe their vote doesn't count or the election is 'rigged'. The article the user shared was flagged as dangerous by Twitter. Tweet from Sonoma County explaining misinformation :https://twitter.com/countyofsonoma/status/1309588979545645056?s=21	Twitter removed post.	Removed			
Twitter	9/21/2020	10:18 AM	CALIFORNIA! Check your voter status. Newsom's brood of vipers moved most of us to Permanent Mail voting. If you don't want that then you need to go to http://registertovote.ca.gov to change it. It also appears that absentee ballots are now Vote by Mail which are handled differently. https://twitter.com/IminHisbook/status/1307730820417818624	Ballots Mailed to All Voters. CALIFORNIA! Check your voter status. Newsom's brood of vipers moved most of us to Permanent Mail voting. If you don't want that then you need to go to http://registertovote.ca.gov to change it. It also appears that absentee ballots are now Vote by Mail which are handled differently.	Permanent VBM	Case# 0173869959: partner_election [ref:00DA0000000K0A8.5004A000020BW1V:ref]	9/21/20	4:30 PM	Report post - We wanted to flag this Twitter post: https://twitter.com/IminHisbook/status/1307730820417818624 from user @IminHisBook. In the post - the participants claim that Gavin Newsom changed everyone's voting status to automatic, permanent mail in votes. We are concerned for the spread of this misinformation. The truth is that because of COVID-19, California passed a law to send every active, registered voter a vote-by-mail ballot for the November 3rd election, and only the November 3rd election. This does not change individuals' voter preferences permanently and this misrepresentation of the method to vote/register this year has the potential for voter suppression and confusion.	Twitter removed post	Removed			
Twitter	9/10/20	9:08 AM		@realDonaldTrump I just found out that Gov. Newsom just changed everyone in the state of California to mail in ballots. I had to re-register to vote so I can vote in person https://twitter.com/Michell76950584/status/1304089251072544768	Permanent VBM/Bot Activity	Case# 0172429489: partner_election	9/11/20	4:33 PM	Looks like bot activity based on name. Post lies about voters being automatically switched to VBM as preference, and implies people would have to reregister if they want to vote. This could cause voter suppression of anyone who thinks they can't vote in person because they didn't re-register.	Account suspended.	Removed			
Twitter	9/1/20	6:46 AM		https://twitter.com/RieneRichard/status/1300792119716491264 This tweet promotes blatantly false voting information that could lead to voter suppression. While every California voter will receive a Vote-by-mail ballot, in-person voting options will still be made available	VBM-Only	Case# 0171155041	9/1/20	1:01 PM	https://twitter.com/RieneRichard/status/1300792119716491264 We would l ke to report this tweet because it promotes blatantly false voting information that could lead to voter suppression. While every California voter will receive a Vote-by-mail ballot, in-person voting options will still be made available	Post removed.	Removed			
Twitter	9/27/2020	7:52:00 PM		Thousands of ballots found in California dumpster. VOTER Fraud is running rapid. Vote in person. https://twitter.com/OrlandoCamper/status/1310376842898157568 Ballot Disposal. Tweet falsely alleges ballots were found in Sonoma dumpster - does not mention they were recycled materials from 2018. 29 RTs, 24 likes as of 10:33am 9/28. https://twitter.com/lizglock40/status/1310412086426689536	Sonoma County	Case# 0174778575: partner_election [ref:00DA0000000K0A8.5004A000020Of0A:ref]	9/29/20	12:13 PM	Hello, I'd like to report this tweet: https://twitter.com/lizglock40/status/1310412086426689536 This is a story being circulated on social media about ballots being thrown out in Sonoma County. This is a dangerous lie - Sonoma County has explained that they were empty envelopes and other election materials from the 2018 election, that were disposed of per their retention schedule. They were not in any way related to the current election. They were sent to processing immediately and are no longer accessible. This misinformation perpetuates a narrative about fraud in our elections that leads to voter suppression of voters who are misled to believe their vote doesn't count or the election is 'rigged'. The article the user shared was flagged as dangerous by Twitter. Tweet from Sonoma County explaining misinformation :https://twitter.com/countyofsonoma/status/1309588979545645056?s=21	Twitter found this account in violation of our Twitter Rules and we have taken appropriate action. Post still up as of 9/29 3:01 PM.	No Action Taken			
Twitter	9/16/20	5:58 AM		i'll vote for biden if one of his supporters sends me $500 dollars. if you're a biden supporter and decide to not send me $500 you're voting for trump. https://twitter.com/antihoa/status/1306215766719688704	Solicitation	Case# 0173337348: partner_election [ref:00DA0000000K0A8.5004A00001zrzw8:ref]	9/18/20	11:00 AM	The user @Antihoa recently tweeted: https://twitter.com/antihoa/status/1306215766719688704. "i'll vote for biden if one of his supporters sends me $500 dollars. if you're a biden supporter and decide to not send me $500 you're voting for trump" - it's gotten significant reshares and though she's been alerted to the crime, she shows she doesn't care. This is a violation of Twitter's terms of service because it is a crime under state and federal law to solicit and or receive any consideration/money in exchange for voting, voting for someone, or not voting for someone.	Post still up as of 12/7 9:30 AM	No Action Taken			
Twitter	9/15/2020	5:52 PM		If California can locate illegals to give them free money and voting ballots, then they should be able to find them to deport them. https://twitter.com/BradleyCongress/status/1306033060178210817	Voter Qualification	Case# 0173335666: partner_election [ref:00DA0000000K0A8.5004A00001zrzlo:ref]	9/16/20	10:45 AM	The tweet is misinformation and damages election integrity and leads to voter suppress. It states California gives voting ballots to illegal citizens - and only eligible citizens are able to vote.	Post still up as of 12/7 9:30 AM	No Action Taken			
Twitter	9/13/20	7:27 PM		In 244 U.S. counties, there are more registered voters than there are people legally elig ble to vote. Twenty-nine states have counties with more registered voters than legal residents. And eight states have more registered voters than actual voting-age people. https://twitter.com/prageru/status/1305332188121116677	Voter Qualification	Case# 0172781748: partner_election [ref:00DA0000000K0A8.5004A00001zp4d4:ref]	9/14/20	12:39 PM	https://twitter.com/prageru/status/1305332188121116677 This tweet promotes false information about our elections that would lead to the suppression of voters across the nation. Voter fraud is virtually nonexistent in our elections and indicating it exists inherently leads to distrust in our elections process that would keep people from voting, and/or cause civil unrest if people do not believe the results.	Post still up as of 12/7 9:30 AM	No Action Taken			

Platform	Date of Post	Time of Post	Screenshot/Text/Link	Misinformation	Indicator	Tracking Number	Date Reported	Time Reported	Reporting Details	Social Media Action Taken	Result	Date Removed	Time Removed	
Twitter	9/10/2020	11:22:00 PM		Double-voting. Yes, he did. I plan on voting several times. I can only vote once in my state because we have to show ID. But, I'm flying to California where I'll vote as many times as I can, plus I should be able to send in quite a few mail-in ballots. How about you? https://twitter.com/vwmfalcon21/status/1304304292552204288	Double Voting	Case# 0172782201: partner_election [ref:00DA0000000K0A8.5004A000001zp4Iz:ref]	9/14/20	12:47 PM	Tweet indicates you can vote more than once, promotes distrust in elections process, and indicates attempt at voter fraud which is illegal. All of which could lead to voter supporession.	Post still up as of 12/7 9:30 AM	No Action Taken			
Twitter	11/3/2020	6:47 AM		Voting fraud in Dem States California Cheating, cheating.. They give me paper to fill out Then I scan it into a scanner This is stored in a hard drive This hard drive will be loaded into internet on Election Day They can reject this hard drive and load their default hard drive	Voter Fraud	Case# 0179172911: partner_election [ref:00DA0000000K0A8.5004A000021Jg1k:ref]	11/3/2020	11:10 AM	We wanted to flag this Twitter post: https://twitter.com/JanePK/status/1323637872310714369 from user @JanePK. in this post user claims election officials will use alternate hard drive to commit election fraud. This accusation can lead to voter distrust and should be addressed accordingly.	Thanks for your report. After our review, we've locked the account for breaking our rules. Please keep in mind, the account does have the option to take the actions we've requested to have their account unlocked. This can include deleting the Tweet(s) that violated the rules, having their account features be temporarily limited or updating specific information on their account.	Removed	11/4	2:01 AM	
Twitter	11/3/2020	11:27 AM	No worries i used an alias when voting in person. No id needed so it was easy. Thinking of going back later today if the lines arent too long. https://twitter.com/dailyTT3/status/1323708441127350272	No worries i used an alias when voting in person. No id needed so it was easy. Thinking of going back later today if the lines arent too long.	Voter Fraud	Case# 0179201999: partner_election [ref:00DA0000000K0A8.5004A000021Jpua:ref]	11/3/2020	4:30 PM	We wanted to flag this Twitter post: https://twitter.com/dailyTT3/status/1323708441127350272 From user @dailyTT3. In this post user claims he used an alias when voting in person. No ID needed so it was easy. Thinking of going back later today if the lines aren't too long. This is voter fraud and needs to be address accordingly.	Thanks for your report. After our review, we've locked the account for breaking our rules. Please keep in mind, the account does have the option to take the actions we've requested to have their account unlocked. This can include deleting the Tweet(s) that violated the rules, having their account features be temporarily limited or updating specific information on their account.	Removed	11/4	4:33 AM	
Twitter	9/25/20	7:50 AM		Repeated pic of drop box with words unmanned and unmonitored vote in person no one is watching these https://twitter.com/BrianGoodlife/status/1309505665048567816	Drop Box Security	Case# 0174779241: partner_election [ref:00DA0000000K0A8.5004A0000020Ofi5:ref]	9/29/20	12:19 AM	Hello, I'd like to report this tweet: https://twitter.com/BrianGoodlife/status/1309505665048567816 from user @BrianGoodlife. The post presents misinformation and it is also inaccurate and misrepresents voter rolls, ballot collection, and the security and safety of drop boxes. Leading to potential confusion with the public. User routinely posts misinformation regarding the election/voting and continues to post that mail in ballot collection boxes are unmanned and unmonitored.	Twitter removed post. After our review, we've locked the account for breaking our rules regarding civic integrity. Please keep in mind, the account owner does have the option to take the actions we've requested to have their account unlocked. This can include deleting the Tweets that violated the rules, or updating specific account information.	Removed	10/6	12:07 AM	
Twitter	9/24/20	8:23 AM	Easy target. Would you be concerned if largely Democrat precinct boxes might be targeted? I'm concerned mostly Republican precincts will be targeted. The rioters have shown they will sow whatever division and chaos they can. Use common sense Ms. PhD. Mail in drop boxes are unmanned and unmonitored. Vote in person. Antifa/BLM can destroy 1000s of ballots with bleach, acid and gas. https://twitter.com/BrianGoodlife/status/1309151581556924419	Easy target. Would you be concerned if largely Democrat precinct boxes might be targeted? I'm concerned mostly Republican precincts will be targeted. The rioters have shown they will sow whatever division and chaos they can. Use common sense Ms. PhD. Mail in drop boxes are unmanned and unmonitored. Vote in person.Antifa/BLM can destroy 1000s of ballots with bleach, acid and gas.	Drop Box Security	Case# 0174240113: partner_election [ref:00DA0000000K0A8.5004A000020DQtU:ref]	9/24/20	4:51 PM	We want to flag a post from @BrianGoodlife where he states Mail-in ballot drop boxes are unmanned and unmonitored. On the grounds that its misinformation and misrepresents the voting process and when votes are counted. Leading to potential confusion with the public. https://twitter.com/BrianGoodlife/status/1309151581556924419	Twitter removed post	Removed			
Twitter	9/24/20	6:59 AM	Vote In Person at your polling place. CA SOS has closed hundreds of poll locations so use your local County Registrars website to locate the nearest one. Oh and Dropboxes are unsafe. https://twitter.com/BrianGoodlife/status/1309130427899277313	Vote In Person at your polling place. CA SOS has closed hundreds of poll locations so use your local County Registrars website to locate the nearest one. Oh and Dropboxes are unsafe.	Drop Box Security	Case# 0174241087: partner_election [ref:00DA0000000K0A8.5004A000020DR7Z:ref]	9/24/20	5:04 PM	Report post - We wanted to flag this Twitter post:https://twitter.com/BrianGoodlife/status/1309130427899277313 from user @BrianGoodlife. The post presents misinformation and it is also inaccurate and misrepresents voter rolls, ballot collection, and the security and safety of drop boxes. Leading to potential confusion with the public. User routinely posts misinformation regarding the election/voting.	Twitter removed post	Removed			
Twitter	10/13/2020	4:44 AM		California hired a pure Sleepy Joe Democrat firm to count and "harvest" votes. No way Republicans get a fair shake. Lawyers, get started!!! @GOPLeader California is in big trouble. Vote Trump and watch the greatest comeback of them all!!! Also, New York and Illinois - go for it! The statement in this tweet that "California hired a pure Sleepy Joe Democrat firm to count and "harvest" votes." is completely false. https://twitter.com/realDonaldTrump/status/1315981668784709632	Ballot Collection/Harvesting	Case# 0176459384: partner_election [ref:00DA0000000K0A8.5004A000020oR2m:ref]	10/13/2020	4:01 PM	The statement in this tweet that "California hired a pure Sleepy Joe Democrat firm to count and "harvest" votes." is completely false: https://twitter.com/realDonaldTrump/status/1315981668784709632?s=20 Ballots in California are only counted by local elections officials in an open and transparent process. This tweet undermines voters confidence that their votes will be fairly and properly counted. Please see relevant election codes:Relevant ECs 15004,15104,15360 re public observation From our Voting Law Compliance Handbook: sos.ca.gov/elections/publications-and-resources/voting-law-compliance-handbook I would like to watch how ballots get counted on election night to see how it works. Is this process open to the public? [Please contact your county elections official to ask if there are COVID-19 specific instructions related to elections observers.] Yes. The entire process, from the opening of the vote-by-mail ballot envelopes to the counting of ballots on election night is open to the public. (Elections Code §§ 15004, 15104) Contact your local election official for more information on observing the process on election night. Additionally, to test the accuracy of the counting machines prior to the official certification of election results, each county election official must conduct a public manual count of the ballots cast in one percent of the precincts or a two-part public manual count; the ballots counted are chosen at random by the election official. (Elections Code § 15360) Relevant ECs 15101 re county's as entities who county: Jurisdictions count ballots through a detailed process in EC 15100 et seq.	We're writing to let you know that after a review, we didn't find a violation of our civic integrity policy in the content you reported.	No Action Taken			
Twitter	9/21/20	9:48 PM		@AlexPadilla4CA Just letting you know my absentee ballot has already been cast.... some how with out ever reaching my house. Not l king this. #DNC2020 #DNC #California https://twitter.com/underhill4517/status/1308221513263271938	Ballot Cast Prior to Date	Case# 0174240603: partner_election [ref:00DA0000000K0A8.5004A000020DQzs:ref]	9/24/20	4:57 PM	Report post - We wanted to flag this Twitter post:https://twitter.com/underhill4517/status/1308221513263271938 from user @underhill4517. The post presents misinformation and misrepresents the voting process and when votes are counted. Leading to potential confusion with the public. User routinely posts misinformation regarding the election/voting.	Post still up as of 9/25 3:24 PM	No Action Taken			
YouTube	11/9/2020	N/A	This individual made a youtube video of himself registering to vote (or attempting to) under a fake alias ("Marco Fernandez") in Los Angeles County, California, in hopes of the video going viral. (He is also spreading false information about CA voter laws.) https://www.youtube.com/watch?v=r-hyOl_10E4&t=130s	I would like to report voter registration fraud.This individual made a youtube video of himself registering to vote (or attempting to) under a fake alias ("Marco Fernandez") in Los Angeles County, California, in hopes of the video going viral. (He is also spreading false information about CA voter laws.) Here is the video: https://www.youtube.com/watch?v=r-hyOl_10E4&t=130s The individual who made the video is Paul Leach 6021 Hackers Ln Agoura Hills, CA 91301-1409 DOB: July 20, 1972 The fake email he used is marcofern72@yahoo.com He may also go by an alias: Paul Soleil To the best of my knowledge, the information I have provided is correct. Thank you so much for looking into this matter.	Voter Fraud	N/A	11/13/2020	11:31 AM	Hi all, My name is Jenna Dresner with the Office of Election Cybersecurity for the California Secretary of State. I wanted to report this video where an individual made a Youtube video of himself attempting to register to vote under a fake alias. The videographer makes false claims around California elections, including that it would be easy for non-citizens to vote, that there are many "fake registered voters" out there, and that you could pay masses of people to set up fake voter registrations to sway elections. Aside from being false, these claims fuel distrust in our elections and display an intent at multiple cases of voter fraud which are illegal. Here is the video: https://www.youtube.com/watch?v=r-hyOl_10E4&t=130s Please let me know if you need additional information. Jenna	YouTube removed post	Removed	12/8/20	10:13 AM	

Platform	Date of Post	Time of Post	Screenshot/Text/Link	Misinformation	Indicator	Tracking Number	Date Reported	Time Reported	Reporting Details	Social Media Action Taken	Result	Date Removed	Time Removed	
YouTube	9/22/2020	2:00:00 PM	"The states are taking reasonable steps to clean up the rolls and that led in part to a settlement with Los Angeles county in Californian Michigan they chant the court uh one court judge changed the rules to allow them to count ballots 14 days after the election and mandated ballot harvesting and what is ballot harvesting it basically means anybody can take anyone's ballot and bring it to the polling place again more opportunity". https://www.youtube.com/watch?v=rYhZobZ-5IM#:~:text=california&text=ballot&text=harvesting&text=california&text=california	"the the states are taking reasonable steps to clean up the rolls and that led in part to a settlement with los angeles county in californiain michigan they chant the court uh one court judge changed the rules to allow them to count ballots 14 days after the election and mandated ballotharvesting and what is ballot harvesting it basically means anybody can take anyone's ballot and bring it to the polling place again more opportunity"....Ballot Collection/Harvesting; Voter Rolls. Head of conservative group Judicial Watch hosts video alleging Democrats benefit from incorrect voter rolls and ballot collection. Has 2,398 views as of 4:07pm 9/22.	Ballot Collection	Emailed YouTube no case# yet.	9/24/20	4:40 PM	Report video- We wanted to flag this YouTube video because it misleads community members about elections or other civic processes and misrepresents the safety and security of mail-in ballots. https://www.youtube.com/watch?v=rYhZobZ-5IM#:~:text=california&text=ballot&text=harvesting&text=california&text=california	Video was removed from YouTube	Removed	9/27/20	7:04 PM	