

Windham State Primary Election, September 13, 2022

To the voters of the Town of Windham, NH Secretary of State David Scanlan and NH Attorney General John M. Formella

I, Eugene M. Van Loan III, was appointed pursuant to RSA 659:77 as monitor for the Town of Windham's State Primary Election held on September 13, 2022. The appointment was made jointly by the current Secretary of State and the Attorney General. The basis for the appointment is outlined in a joint letter from then Secretary of State William Gardner and Attorney General John Formella to the Town's attorney, Bernard H. Campbell, dated January 7, 2022, involving the circumstances of the Town's conduct of the State General Election of November, 2020. *

*Note – specific recommendations for the future are in italics.

1. Pre-Election testing of the voting machines – Tuesday/Wednesday, September 6/7, 2022

My first involvement with the Windham Primary Election was to observe the pre-election testing of the Town's Accuvote ballot counting machines. This was originally scheduled to occur on Tuesday, September 1, 2022 at the Windham Town Hall. When I arrived at the appointed hour that morning, I was greeted by a posted notice that said that the testing was being postponed to the following day because the Town facilities had been subjected to a major power outage in the prior night. I did, however, run into the Town Clerk, Nicole Merrill, and we had a chance to meet to discuss plans for a rescheduled testing session and what to do if power was not available at the Town facilities the next day.

The following day, Wednesday, September 7, I returned to Windham and went to the Town's Development Office, which is next door to the Town Hall – and which did have power. I met Ms. Merrill and the Town Moderator, Peter Griffin, their respective deputies, and 4-5 citizen assistants. I was also joined by Jennifer Cote from the Secretary of State's Office, who had been assigned to assist me as Monitor. The Town's team had already assembled the ballot boxes for the machines and was in the process of bringing in the machines and the test ballots.

After introductions and some preliminary discussions about the process, we dealt with an issue to which I had been alerted the day before – the fact that in the course of the preliminary hand-marking of the two ballot test decks (50 Republican and 50 Democrat), 3 blank test ballots had been set aside from each test deck with the intent of using them later to test the accessible voting system [hereinafter "AVS"] device, which had not yet been received by the Town from the Secretary of State [hereinafter the "SOS"]. After a conversation I had with Bud Fitch of the SOS office, a review of the Election Procedure Manual [hereinafter the "Manual"], and some email correspondence, I advised the Clerk that the removed 3 + 3 test ballots should be hand-marked (as the other 47 + 47 had been

the week before), that their votes should be added to the hand-count tally of the other 47 + 47, and that the ballots should then be physically integrated back into their respective test decks. (The Clerk was also advised that some blanks from her inventory of unused absentee ballots should be used to test the AVS device when it arrived.)

As a result of the foregoing, commencement of the machine tests was delayed until the test decks could be restored to a 50 + 50 count. The Clerk and the Moderator (wisely, in my opinion) decided not to begin the testing process until the foregoing had been completed (in other words, not to start running the 47 + 47 partial decks through any machine).

Meanwhile the Clerk, the Moderator and their assistants were involved in removing seals from the machine bags, extracting the machines, installing the machines in their slots on the ballot boxes, and recording the broken seal numbers on the activity logs. The Moderator also unlocked the compartments to the machines and installed a memory card in each machine. (Windham has a primary memory card plus a back-up memory card for each of its machines, so there are a total of 8 memory cards.)

Once the Republican test deck was restored to 50 ballots, the testing began by running the Republican deck through Machine #1, in the required 4 different orientations. The staff then moved on to begin running the Republican deck through Machine #2. Around this time, the staff had completed restoring the Democrat test deck to 50 ballots. Accordingly, the running of the Democrat ballots in the required 4 different orientations was commenced on Machine #1

When both test decks had been run through Machine #1, and as the test decks were being run through the subsequent machines, the Moderator printed out a machine-count tape for Machine #1 for purposes of comparing the machine count to the hand-count tally sheets for the test decks (as amended after the 3 + 3 ballots that had been marked, hand-counted, and restored to the test decks earlier in the morning - as described above.)

A comparison of the Machine #1 tape and the tally sheets indicated some minor discrepancies – which meant that either the machine count was wrong or that hand-count tallies were wrong. At that point, the Moderator and Clerk called a halt to the testing process. After some discussion of alternatives, the following was decided upon:

- a. The test decks would continue to be run through Machines # 2, 3 & 4, in each case in the required 4 orientations;
- b. At the conclusion of both decks being run through a given machine, a tape for that machine would be run.
- c. The tape from each machine would then be compared to the tapes from all the other machines to see if they were consistent with each other (*i.e.*, was each machine recording the same number of total ballots counted, as well as the same number of individual votes, blanks, etc. for each candidate).
- d. Checks would then be conducted comparing the machine counts – as per their tapes - to a random in-situ hand-count of the test ballot decks to determine if

the results were consistent. (Note- these comparisons were not between the machine counts and the hand-count tally sheet numbers, but between the machine counts and an on-the-spot hand-count of selected actual ballots themselves.)

The results of the foregoing established the following to the satisfaction of the Clerk and the Moderator – and this Monitor – that:

- a. The hand-count tally sheets contained some inaccuracies;
- b. The machine counts on all 4 machines were consistent with each other. (This, by the way, was repeated when each of the back-up memory cards for each machine was tested by running the 50 + 50 test decks, in all four required orientations, through each of the four machines.)
- c. The machine counts were consistent with the in-situ random hand-counts of the physical test ballots.

THEREFORE, THE WINDHAM ELECTION OFFICIALS CONCLUDED THAT THE FOUR WINDHAM ACCUVOTE MACHINES AND THEIR RESPECTIVE MEMORY CARDS WOULD ACCURATELY RECORD THE VOTES CAST BY THE VOTERS AT THE WINDHAM PRIMARY. THIS MONITOR AGREED WITH THAT CONCLUSION.

Notwithstanding the aforesaid, this Monitor has the following observations to make with respect to the currently prescribed process for pre-election testing of the accuracy of the Accuvote machines:

- a. *The instructions in the Manual for what ballots are to be used to test a town's AVS device in the event that it had not been received prior to the start of the hand-marking of the test decks is less than clear. See pp. 76 & 371. In this Monitor's opinion, the testing of the AVS devices should NEVER involve the use of ballots removed from the test ballot deck, regardless of when the AVS device is received, and should ALWAYS involve unused absentee ballots. This should be clarified in the Manual.*
- b. *The instructions in the Manual do not effectively deal with an inconsistency between a machine count of test ballots and a tallied hand-count of the test ballots. It is assumed that the hand-count is the gold standard and, therefore, that if there is an inconsistency, the machine count must be wrong. However, as is often reflected by recount experience, hand-counts can have errors too. One could, of course, do a completely new hand-count of both test decks, but this would take significant time and manpower, during which time the machine testing would grind to a halt. Moreover, the Manual encourages that the hand-count of test ballots be done before the test ballots are run through the machines in order "to limit allegations that the hand count was made to*

match the device count.” See para 8, p. 373. Perhaps the Windham experience is instructive. As detailed above, (1) tapes run on each machine and each memory card were compared with each other to verify the consistency of the machine counts, and (2) a random comparison was made of the machine counts and the marked test ballots for selected individual races to verify that the machines were accurately recording the voting marks on the test ballots. However, the Windham resolution of the conflict was a seat-of-the-pants resolution – which worked – but may not be a model for all situations.

- c. One other thing that perhaps should be emphasized in the Manual or otherwise is that the hand-count of the pre-marked test ballots must not include ANY of the votes on the ballots which have been pre-marked with an overvote in one or more races. Unlike a ballot with a write-in, where the machine counts all votes on the ballot other than the write-in, the machine counts NONE of the votes on a ballot which has an overvote in some race. Accordingly, if the hand-count tally of the test ballots counts the votes for races other than the overvoted race, the hand-count tally and the machine count will differ because the machine will not have counted ANY of the votes on a ballot with an overvote. The Manual does indeed deal with this situation (see para 8, p. 373), but in this Monitor’s opinion, it could be made more explicit.*
- d. Similar to the issue raised in (c), above, is the problem created when the machine refuses to accept and count a ballot which does not contain an overvote, but has some other problem with it that causes the machine to refuse to accept the ballot. We experienced an issue with one test ballot that had a rogue hashmark on the rear near the timing marks. It was rejected by a couple of the machines in a particular orientation. As a result, it had to be placed in the side bin as a ballot that had to be hand-counted. This, in turn, dictated that, for those machines that refused to accept the ballot, the machine count for all of the races on that ballot would differ from the hand-count of that ballot – and, yet, neither the hand-count nor the machine count was in error; they were just counting different things.*
- e. Finally, there is a potential problem created by the instruction in the Manual that 15 ballots in each test deck be hand-folded by the Clerk to replicate an absentee ballot. The Manual instructs the Clerk to ensure that the fold line does not pass through an oval – because it might be interpreted by the machine as a vote (as occurred in the Windham situation in 2020). See para 2, p. 371. However, without scribe lines which appear on the rear of genuine absentee ballots and which are used as folding guides, test ballots have no*

scribe marks and, thus, it is fairly easy for test ballots to be folded in the wrong place. We experienced several such ballots that one or more of the machines initially either refused to count as an "invalid" ballot or refused to count because, due to some other votes in the area, it treated the ballot as containing an overvote. In all cases, a smoothing out of the crease in the ballot was sufficient to eliminate the problem and the ballot was accepted and properly counted by the machine. The point is that if the machine had continued to reject the ballot and, thus, if the ballot had to be put in the side bin and hand-counted, as in (d) above, the hand-count and the machine count would differ, but neither would be wrong. This Monitor suggests either that:

- 1. The folding of test ballots to replicate absentees be scrapped as unnecessary; or*
- 2. The SOS include in the test decks actual absentee test ballots properly and officially folded (either as part of the 50 ballot test decks or in addition thereto).*

2.Election Day, Tuesday, September 13, 2022

I arrived just after the Windham polls opened at 7a.m. at the Windham High School. The Moderator informed me that, as required, he had had the voting machine compartments checked as empty and that he and the Clerk had run zero tapes on each of the 4 machines. He also advised that he had announced that absentee ballot processing would commence at 9 a.m. (as was permitted by the applicable statutes).

The Windham High School gym is spacious and was nicely set up to accommodate a large number of voters. Checklist tables were well-marked, appropriately spaced and manned by two persons each. Required notices were posted at the entrance to the gym and inside the voting booths/desktops. The AVS tent was in place and (I was informed) the device had been tested and was in operation.

Outside, a no-electioneering corridor leading to the door to the school had been established and candidates and their supporters had set up alongside the corridor.

Absentee ballot processing commenced on schedule. The Moderator had located the processing table within the appropriate distance from the "guard rail", beyond which challengers and spectators were permitted to be and to observe. However, there was no physical rail; instead, the line was marked by several stanchion posts. Although there were no breaches of the line by the observers, *I would recommend that the stanchions be hereafter connected by a physical barrier such as a rope, surveyors tape, police/fire tape, etc.* (This was done later in the evening when the counting began so that the observers were, in fact, physically separated from the machines and the hand-count tables.)

The Moderator designated one machine as the depository for all to-be-counted absentee ballots, which this Monitor recommends as a best practice for those towns which have more than one voting machine. Besides collecting all of the absentee ballots in one place so that they can be separately examined if there be any need for such, it means that in-person voters are not required to wait while absentee ballots are being batch-fed into a machine. Because the selected machine was located right next to where the absentee ballots were being processed, it was also proximate to the observers.

There were essentially no issues/problems encountered during the day prior to the close of the polls. As a result, some of the election officials in attendance often had little to do except observe and be available to voters who had a question or needed some type of assistance.

Accordingly, in the future, I would recommend that some tasks be done by the election officials in their “downtime” to prepare in advance for the close of the polls and the counting process – where the pace of things inevitably picks up:

- a. The boxes which are supplied flat by the SOS for packing and sealing the ballots post-election should be folded and laid out, ready to receive ballots. Sealing labels can be partially filled out (name of the town, date of the election, etc.), and, one each, placed inside the empty boxes, so that they are ready to go.*
- b. Some of the boxes can be filled – although not yet sealed and the sealing labels not yet completely filled out – before the polls close. For example:*
 - 1. The empty absentee affidavit envelopes and other absentee paraphernalia;*
 - 2. The unused absentee ballots;*
 - 3. As it gets close to closing time and the number of unused regular ballots likely to be needed by 8 pm can reasonably be predicted, the balance of the unused regular ballots that are not likely to be needed.*
- c. Any tally sheets that are to be used for hand-counts (either of ballots not counted by the machines and removed from the side bins or of ballots containing uncounted write-ins) should be set up with appropriate names of races, names of candidates, etc. - again so that they are ready to go when the time comes.*
- d. The crews that are to do the hand-counting might be invited to convene (say, at 7 pm) prior to the 8 pm close of the polls for a prep session with an assistant Moderator/assistant Clerk so that they know exactly what they are to do when the polls close and they begin receiving ballots from the machines. (This Monitor did witness several such sessions being conducted during the day in connection with “shift changes” in personnel, such as ballot clerks. My only criticism involves their location. They were conducted near the voting machines, in the midst of the hustle and bustle of voter traffic. A better – and quieter – location should perhaps*

be considered, especially for the General Election when the numbers will be greater.)

The polls were closed promptly at 8 pm. However, because there were a few voters who had gone through the check-in process and received a ballot, but who had not finished marking their ballots and depositing them in a voting machine, the Moderator waited until they had done so before completely shutting the polls down. At that point, just as the Clerk had begun to run the long-report results tapes on the voting machines and the staff had commenced removing cast ballots from the main compartment of the first of the machines, Windham experienced the second of its Primary Election power failures. (See discussion above concerning the delay of the pre-election machine testing.) This time, the power outage manifested itself by all of the lights in the High School gymnasium going off. Although various election officials and members of the observing public were able to provide some illumination with their cellphones, the Moderator immediately brought everything to a halt. After a short delay, one of the school's custodians was located and - to the relief of all - he was able to restore the lights. (It appears that the cause of the problem was that the gym's lights were on a timer, which had been set to automatically turn the lights off in the evening.)

Order was quickly reinstated and the counting process resumed. The ballots were cleared from each machine's three bins, with care being taken to keep each bin's contents separate from the contents of the other bins. See Manual, p. 152. One unexpected thing soon became apparent - there were an unusually large number of ballots in the write-in bins. For whatever reason, a number of voters did not cast a "genuine" write-in, *i.e.*, they did not write in the name of a person whose name was not on the ballot; instead, rather than filling in the oval opposite the name of a person who was listed on the ballot, they wrote that person's name in the write-in space. (And, to complicate the hand-counting process, they sometimes did not fill in the oval opposite the written-in name.) It is not clear why this phenomenon occurred. In any case, as a result, the teams that had been established to do the hand-counting of ballots that had not been fully processed by the machines were somewhat overwhelmed.

More important, when the tally sheets from the hand-count tables were submitted to the team that input the counting data (from both the machine tapes and the hand-counts) into their spreadsheet, certain anomalies in the reconciliation began to appear. This Monitor was not - and still is not - familiar on a granular level with exactly what those anomalies were. As this Monitor understands things, the apparent anomalies had to do with the total number of ballots supposedly cast in one of the two party Primaries not being consistent with the aggregate number of votes that the candidates in certain races in that Primary had received.

It is believed that some of the difficulties stemmed from the new statutory requirement (RSA 659:73, IV (k) & (l)) that election officials were not only to report who won each individual race and the number of ballots cast in the election, but also (a) the number of overvotes and undervotes in each individual race and, (b) the total number of ballots containing *any* overvote in *any* individual race. See Manual, pp. 153 & 172-3. One of the problems with these requirements is that when a voting machine encounters a ballot with an overvote in any individual race, the machine shunts such a ballot off to its side bin and does not count the ballot.

This means that a complete hand-count of the ballot is required. See Manual, pp. 7 & 153. Nevertheless, even though the machine never counts any overvoted ballot, the results tape that the machine produces at the conclusion of the election has a category in the “ballots cast summary” for “overvoted”. (Similarly, the results for each individual race has a category for “overvotes”.) Although the entry on the tape for the overvote category will always be “0” – and the category is therefore meaningless - the fact that the category exists is arguably confusing.

Moreover, when the write-ins for individual races are counted - which can only be done by hand-counting because the machines read marked ovals, not written names – another peculiarity appears. As illustrated by example #1 in the Manual, pp.103-4, if a voter writes a name in for an individual race, but does not fill in the oval opposite the write-in line, a machine will not count that as a vote for anyone and (so long as no other person – including the person whose name was written in, but whose name is printed on the ballot - has been voted for in that race) the machine will count this as an undervoted race. However, the hand-count will reveal this to be a valid write-in. The Manual directs the election officials (1) to record one vote for the person whose name was written in and (2) to “reduce the number of blanks (undervotes) by one”. How adjustment (2) is to be accomplished in the real world is not clear.

If nothing else, the new requirements would appear to be an invitation to inadvertent miscounting of overvotes and undervotes and, thus, it may be that some of the apparent anomalies that Windham experienced had to do with this issue.

Another possible cause of the anomalies between the votes in the individual races and the total number of ballots cast in each party’s primary had to do with some feature of the computer program that Windham had developed to do its vote/ballot reconciliation. And, if so, it may be that this Monitor was an unwitting contributor to the problem. One of the on-site recommendations that I made prior to the commencement of the counting process was that the ballots which were removed from the side bins of each of the four machines - and which therefore required hand-counting - be kept separate from each other and be separately hand-counted. Windham had not previously done things this way; instead, they had co-mingled all of the hand-count ballots from all of their machines and did a single hand-count of the entire batch. (Keeping each machine’s hand-count ballots segregated was simply consistent with my general belief that anything that identifies which ballots come from where is more conducive to tracking the source of a problem if and when one might arise. However, either method is proper and permissible.) In any case, the Windham election officials followed my recommendation. For whatever reason, it appears that the algorithm which governed the Town’s reconciliation computer program did not recognize and accommodate this change in the counting protocol.

The efforts of the Windham officials to reconcile the apparent anomalies in the data they were receiving from the hand-count tables stretched the counting process into the wee hours of Wednesday, September 14. Eventually, the Moderator was compelled to make a choice:

1. Simply report only the machine tape results for individual races (*i.e.*, without including any hand-count numbers) and inform the SOS and the public that

reconciliation efforts would continue the next day, at the conclusion of which, “official results” would be announced and posted; or,

2. Report the results of the individual races as reflected in the machine tapes together with the hand-count numbers which those who were involved in the reconciliation process concluded were most likely to be accurate - despite the apparent anomalies in the number of total ballots cast.

The Moderator chose Option #2, above. Accordingly, around 3:30 a.m., September 14, he orally reported the results to the few remaining members of the public who were still present. In view of the strong NH policy against releasing partial election results (see Manual, p. 106), the Moderator’s decision - in this Monitor’s opinion – was the appropriate one.

Likewise, in the early morning hours of September 14, sample Republican and Democrat ballots with the Election Night vote totals for all individual races were posted by the Clerk on the Town’s website – together with a statement that there were discrepancies in the results and that there would be a “continuation of the reconciliation process which involves the review of the marked checklist, hand tally sheets, write in tally sheets, new voter registration, and checking the absentee ballot report with various supporting spread sheets.”

The epilogue to this tale is that two Windham races (one in the Republican Primary for the Windham-only State Representative seat and the other in the Republican Primary for the Windham/Londonderry flatorial State Representative seat) were recently recounted. The results of those races, although not identical with the results announced by the Windham Moderator at the conclusion of the Primary, were essentially the same and there were no changes in who the winners were. As for the relationship between the counts in individual races and the total number of ballots cast in each Primary, that also has been shown to coincide, at least by one measure of comparison: comparing (1) the total of votes cast in an individual race + the overvotes in the race (i.e., which show that a voter cast a ballot, albeit one where his/her vote was invalidated in the race where he/she overvoted) + the undervotes in the race (i.e., which show that a voter cast a ballot, but did not vote for any candidate in the race), to (2) the post-closing-of-the-polls manual count of persons checked off on the checklists (as supplemented by Election Day registrations, which are additions to the checklist). (See Manual, pp. 423-4 [Moderator’s Worksheet] & 429 [Election Night Reconciliation Form] for forms designed to accomplish this type of reconciliation.)

Moreover, this Monitor has been informed that one or more Windham election officials who were instrumental in the development of the computer algorithms which govern their counting processes personally attended and observed the recount process, after which appropriate changes to Windham’s computer programs have been made.

This Monitor does have some recommendations that the Town might want to consider with regard to how its election-day managerial functions might be improved. In particular, as witnessed by this Monitor at the September 13 Primary, once the polls had closed and the counting process had begun, things were less well organized than they had been during the day. Windham is very fortunate to have a substantial cadre of experienced, dedicated, volunteers to

work its elections. Nevertheless, general chain-of-command at counting time could be tightened up. Too many “old hands” who have “done it before” tend to act independently, which means that supervision/coordination breaks down. Coordination has become especially important in light of the increasingly frequent imposition of new legislative and administrative rules/procedures/etc. which, for better or for worse, change how things need to be done compared to the way they have been done in the past. Among other things, this means that:

- 1. Basically, those who are in charge need to take more control of the process. The supervisors (Moderator and his/her deputies, and Town Clerk and his/her deputies) need to delegate ministerial duties to others and reserve themselves for supervision of others rather than getting personally bogged down in detail (while everyone else either waits around wondering what to do or starts doing things independently which perhaps shouldn't be done or perhaps shouldn't be done at that time or in that way).*
- 2. Supervisory staffing needs to be broadened. Each of the Moderator and the Clerk has one Deputy. In my opinion, whereas this might be sufficient at a state primary election or a town election, when it comes to a state general election, each of the principal election officers ought to have at least two (experienced) deputies.*
- 3. The number of volunteer workers tasked with hand-counting ballots that either have not been machine-counted at all (i.e., those shunted into a machine's side bin) or that have only been partially machine-counted (i.e., those with write-ins), needs to be (a) beefed up for the general election and, of course, (b) they need to be educated as to exactly what they are to do and how to record the hand-counts on their tally sheets.*

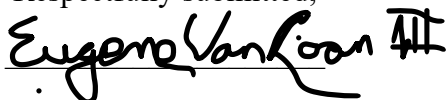
Finally, I feel that it appropriate to report one incident involving a controversy between the Windham election officials and a member of the public that occurred during the counting process. As the process slowed down due to the efforts of the election officials to reconcile the aforementioned anomalies between the number of votes cast in some individual races and the supposed total number of ballots cast, one of the political party-appointed challengers (see RSA 666:4) requested that the Moderator move the table at which the reconciliation team was compiling the info from the machine tapes and from the hand-count tally sheets. The table was located immediately beyond the last of the four voting machines, which, in turn, were next to each other in a row extending from a spot located approximately 4 feet in from the guardrail. The protesting challenger had a “line of sight” view of all the voting machines and of the table (see Manual, p. 8-9), but he wanted the table/to be moved so that it was at the front end of the row of the machines, *i.e.*, within 4 feet of the rail and him. The Moderator declined to move the table or to relocate the reconciliation team. He did dialogue with the challenger for a few minutes, but when it became obvious that the Moderator's explanations for his decision were not going to satisfy the challenger and the discussion was getting a bit heated, the Moderator simply turned away and terminated the discussion.

The challenger was clearly within his legal rights to make his request. However, the Moderator was not legally bound to grant the request. Note that no ballots were being counted at the table in question; in fact, no ballots were even at this table. The Moderator apparently felt that those on the reconciliation team needed more peace and quiet than they were likely to get if they had to conduct their business in close proximity to interested and vocal observers at the guardrail. Moreover, this Monitor would add that peering over the shoulders of the reconciliation team when they did their adding, subtracting and data entry into the computer that they were using – as this Monitor did - is not something that yields any materially useful information for an observer. (By way of analogy, the Manual provides [at p. 8] that even when ballots are being hand-counted, “the right to see and hear the hand counting of ballots does not mean that the observer has the opportunity to see how each ballot is marked as it is counted.”) Therefore, in the opinion of this Monitor, the decision whether to grant or deny the challenger’s request was within the discretion of the Moderator.

I have placed my recommendations for process improvements in italics in this report. I am pleased to report that I recently received a communication from the Moderator that the Windham election officials have already agreed among themselves to adopt a number of procedural/managerial changes which, without my input, track a number of my recommendations.

As an aside, this Monitor feels compelled to render a personal observation which his experience in Windham has only magnified with respect to his beliefs about our great state. New Hampshire has always had a track record of conducting clean, fair and accurate elections – all the while consistently reporting one of the highest voter turnout ratios in the nation. We rely in New Hampshire not only upon our elected and appointed public officials, but also upon an army of unpaid, volunteer citizens to perform many functions which a well-functioning government needs to perform. These people deserve our respect and, absent specifically proved instances of malfeasance, our trust. Although arguably beyond his charge, this Monitor respectfully suggests to the Legislature and to the SOS that the administrative burdens of adding increasingly more duties and complexities to the rules governing how our elections are conducted have the potential to kill the golden goose.

Respectfully submitted,



October 11, 2022

Eugene M. Van Loan III