

Exhibit 57

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Russell James Ramsland Jr.

stated on November 24, 2020 in an affidavit:

In 10 Michigan precincts, voter turnout reached 100% and in 6 precincts it surpassed 100%



MICHIGAN

RUSSELL JAMES RAMSLAND JR.





Voters wait in line to fill out a ballot on the last day of early absentee voting before the general election at the Northwest Activities Center in Detroit, Monday, Nov. 2, 2020. (AP)



By [Clara Hendrickson](#)
December 4, 2020

Affidavit in Michigan lawsuit seeking to overturn election makes wildly inaccurate claims about vote



IF YOUR TIME IS SHORT

- Official results from the election show that none of the Michigan voting jurisdictions listed in the affidavit had 100% turnout or higher.
- The affidavit overstates the turnout in these jurisdictions by as much as 10 times

[See the sources for this fact-check](#)

A lawsuit is [asking a federal court](#) in Michigan to force state leaders to disregard Michigan’s certified election results and award its 16 Electoral College votes to President Donald Trump. It includes an affidavit that makes wildly inaccurate claims about voter turnout in Michigan cities and townships.

The affidavit comes from Russell James Ramsland Jr., a cybersecurity analyst and former Republican



The affidavit comes from Russell James Ramsland Jr., a cybersecurity analyst and former Republican congressional candidate. Ramsland is the one who [mistook](#) voting jurisdictions in Minnesota for Michigan towns in a separate flawed analysis of voter turnout. His latest analysis correctly names Michigan voting jurisdictions, but similarly arrives at inaccurate voter turnout rates.

For instance, Ramsland claims that Detroit saw a turnout of 139.29%. The [city's official results](#) show that turnout in the city was actually 50.88% of registered voters.

When asked about the error in Ramsland's affidavit, Gregory Rohl, the attorney representing the plaintiffs in the federal lawsuit in Michigan, said he and his team would investigate the data. "I'm always willing to learn and surely want the facts set forth to be accurate in any filing bearing my name," Rohl wrote in an email to PolitiFact Michigan.

Ramsland's analysis gained public attention when a witness shared its inaccurate findings during a state House Oversight Committee hearing in Lansing Wednesday. During the [hearing](#), Rudy Giuliani, Trump's personal attorney, brought a number of witnesses to share allegations of election fraud and misconduct already discredited by election officials and in court. The witnesses included Col. Phil Waldron, who says he's part of a team that looked into "election manipulation." He claimed that "publicly available information" from Michigan analyzed in an affidavit shows

...inaccurate information that in direct violation



team that looked into "election manipulation." He claimed that "publicly available information" from Michigan analyzed in an affidavit shows excessive voter turnout that indicates election fraud. But the numbers do not square with the statement of votes cast from Michigan counties.

A chart included in Ramsland's affidavit lists 21 Michigan cities and townships, five of which are alleged to have recorded a turnout above 90% in November's election, while 10 purportedly saw turnout of exactly 100% and six surpassed 100%.

Precinct/Township	% Turnout
City of North Muskegon	781.91%
Zeeland Charter Township	460.51%
Grout Township	215.21%
City of Muskegon	205.07%
City of Detroit	139.29%
Spring Lake Township	120.00%
Greenwood Township	100.00%
Hart Township	100.00%
Leavitt Township	100.00%
Newfield Township	100.00%
Otto Township	100.00%
Pentwater Township	100.00%
Shelby Township	100.00%
Shelby Township	100.00%
Weare Township	100.00%
City of Hart	100.00%
Grand Island Township	96.77%
Tallmadge Charter Township	95.24%
Fenton	93.33%
Behemia Twp	90.63%
Zeeland Charter Township	90.59%

It is difficult to imagine that a turnout rate above 100% — let alone 782% in the City of North Muskegon or 461% In Zeeland Charter Township — would have escaped election officials compiling the statement of votes cast. But beyond the implausible turnout rates Ramsland alleges, there are other glaring problems with the list. Shelby Township is named twice. So is Zeeland Charter



implausible turnout rates Ramsland alleges, there are other glaring problems with the list. Shelby Township is named twice. So is Zeeland Charter Township, with two vastly different turnout rates: 90.59% and 460.51%. Ramsland lists "Fenton" without specifying Fenton City or Fenton Township. But the turnout Ramsland lists for Fenton does not match the turnout in either jurisdiction.

The actual turnout statistics reveal the inaccuracy of Ramsland's numbers. His figure for North Muskegon is off by a factor of 10: The actual number is 78.11%, not 781.91%. For Zeeland Charter Township, he inflated the turnout nearly sixfold. For Grout Township and the City of Muskegon, his number is more than triple the correct number.

Figures from Ramsland's affidavit v. Official turnout data

Official turnout data indicates the share of registered voters in the November election who cast a ballot

Precinct/Township	County	Alleged Turnout	Actual Turnout	Alleged Turnout off by a factor of
City of North Muskegon	Muskegon County	781.91%	78.11%	10.01
Zeeland Charter Township	Ottawa County	460.51%	79.81%	5.77
Grout Township	Gladwin County	215.21%	67.23%	3.20
City of Muskegon	Muskegon County	205.07%	55.20%	3.72
City of Detroit	Wayne County	139.29%	50.88%	2.74
Spring Lake Township	Ottawa County	120.00%	78.01%	1.54
Greenwood Township	Oceana County	100.00%	65.50%	1.53
Hart Township	Oceana County	100.00%	65.69%	1.52
Leavitt Township	Oceana County	100.00%	57.78%	1.73
Newfield Township	Oceana County	100.00%	62.30%	1.61



Township	County	100.00%	96.77%	1.02
Leavitt Township	Oceana County	100.00%	57.78%	1.73
Newfield Township	Oceana County	100.00%	62.30%	1.61
Otto Township	Oceana County	100.00%	65.99%	1.52
Pentwater Township	Oceana County	100.00%	82.13%	1.22
Shelby Township	Oceana County	100.00%	37.85%	2.64
Weare Township	Oceana County	100.00%	68.20%	1.47
City of Hart	Oceana County	100.00%	56.66%	1.76
Grand Island Township	Alger County	96.77%	96.77%	N/A
Tallmadge Charter Township	Ottawa County	95.24%	78.89%	1.21
City of Fenton	Genesee County	93.33%	69.80%	1.34
Fenton Township	Genesee County	93.33%	81.56%	1.14
Bohemia Twp	Ontonagon County	90.63%	88.71%	1.02
Zeeland Charter Township	Ottawa County	90.59%	79.81%	1.14

Table: Clara Hendrickson · Source: Official county statements of votes cast November 2020 general election · Created with Datawrapper

There is one location where the actual turnout matches the turnout Ramsland lists: Grand Island Township, a tiny municipality split between an island in Lake Superior and a stretch of the Upper Peninsula’s mainland. Turnout there was 96.77%, according to the official record, as 30 out of the township’s 31 registered voters cast a ballot in November’s election.

FEATURED FACT-CHECK



Charles J. Cicchetti

stated on December 7, 2020 in a Supreme Court filing

In Wayne County





in a Supreme Court filing

In Wayne County, “174,384 absentee ballots out of 566,694 absentee ballots tabulated (about 30.8%) were counted without a registration number for precincts in the City of Detroit”



By Clara Hendrickson · December 11, 2020

The 215.21% turnout rate Ramsland listed for Grout Township initially matched the data in the county’s statement of votes cast, but that’s because there was an error in the report. Gladwin County Clerk Laura Brandon-Maveal explained that the election results certified by the county are accurate, but that the number of registered voters used to compute the turnout rate was incorrect. "We have to hand punch in the total number of registered voters and they put in the wrong number of registered voters," Brandon-Maveal said. The county released a corrected report Dec. 3.



registered voters and they put in the wrong number of registered voters," Brandon-Maveal said. The county released a corrected report Dec. 3.

In a second affidavit Ramsland filed in the same lawsuit Dec. 3, he said that the information source for his first affidavit was data from the state's [open data portal](#) and [Secretary of State's election results page](#) "that no longer exists."

The Secretary of State's office never shared township, city or precinct turnout data on its results page, according to Tracy Wimmer, a spokesperson for the office.

This latest affidavit includes a new list of precincts in another attempt to demonstrate excessive turnout. It shows that "Spring Lake Township, Precinct 6 — B" had a turnout of 120%. Spring Lake Township's clerk said that there's no such precinct. Spring Lake Township Precinct 6 had a turnout of [66.74%](#) in November's election. The list also shows that one precinct in the City of South Haven had a 100% turnout rate. The city's clerk said that there are only eight voters in that precinct, all of whom voted.

Ramsland's new list also showed 33 voting jurisdictions with turnout between 86.79% and 96.77%. An initial review indicated many of these turnout rates are accurate. Michigan had record turnout statewide. President-elect Joe Biden carried the state by [more than 154,000 votes](#).

Our ruling

An affidavit filed in a lawsuit in Michigan seeking



Our ruling

An affidavit filed in a lawsuit in Michigan seeking to overturn the election purports to show turnout rates in Michigan that indicate election fraud.

The numbers do not match the official statement of votes cast in all but one jurisdiction, and many inflate the numbers significantly. The official data show that the number of voters who cast a ballot in November's election did not exceed the number of registered voters in any of the jurisdictions named.

We rate this claim **Pants on Fire!**

Louis Jacobson contributed to this report.



Our Sources

The Detroit Free Press, Dave Boucher, "[Trump allies to Michigan judge: Force Whitmer to overturn results, award state to president](#)," 11/30/20

PolitiFact, Louis Jacobson and Noah Y. Kim, "[Giuliani cites affidavit with crucial errors in press conference](#)," 11/20/20

Gregory J. Rohl, attorney representing plaintiffs in King et al v. Whitmer et al, email, 12/4/20

Russell James Ramsland, Jr., affidavit, King et al v. Whitmer et al, 11/24/20

READ ABOUT OUR PROCESS

[The Principles of the Truth-O-Meter](#)



- Whitmer et al, email, 12/4/20
- Russell James Ramsland, Jr., affidavit, King et al v. Whitmer et al, 11/24/20
- Russell James Ramsland, Jr., affidavit, King et al v. Whitmer et al, 12/4/20
- Muskegon County, Michigan, [Official Results](#), Nov. 3 General Election
- Ottawa County, Michigan, [Official Results](#), Nov. 3 General Election
- Gladwin County, Michigan, Statement of Votes Cast with error in Grout Township, Nov. 3 General Election, accessed 12/3/20
- Gladwin County, Michigan, [Statement of Votes Cast](#), Nov. 3 General Election, updated 12/3/20
- City of Detroit, Michigan, [Election Summary Report](#), Nov. 3 General Election
- Melanie A. Coon, Chief Deputy/Payroll-Elections Clerk, Oceana County Clerk's Office, email, 12/3/20
- Alger County, Michigan, [November 3, 2020 General](#), Nov. 3 General Election
- Alger County, Michigan, county clerk's office, phone call, 12/4/20
- Genesee County, Michigan, [Official Results](#), Nov. 3 General Election
- Elsie Sulkanen, Bohemia Township clerk, phone call, 12/4/20
- The Detroit Free Press, Dave Boucher, "[Fiery Giuliani tells Michigan lawmakers election stolen, offers no credible evidence](#)," 12/2/20
- Carolyn Boersma, Spring Lake Township Clerk, phone call, 12/4/20
- Travis Sullivan, City of South Haven Clerk, phone call, 12/4/20
- Kent County, Michigan, [Statement of Votes Cast](#), Nov. 3 General Election
- Barry County, Michigan, [Statement of Votes Cast](#), Nov. 3 General Election
- [Michigan's Open Data Portal](#), accessed 12/4/2020



Early County, Michigan, Statement of Vote Cast, Nov 3
General Election

Michigan's Open Data Portal, accessed 12/4/2020

The Office of the Secretary of State Jocelyn Benson, 2020
Michigan Election Voter Turnout, accessed 12/4/20

The Office of the Secretary of State Jocelyn Benson, 2020
Michigan Election Results, accessed 12/4/20

Tracy Wimmer, spokesperson for the Office of the Secretary of
State, text message, 12/4/20

Browse the Truth-O-Meter

MORE BY CLARA HENDRICKSON



Donald Trump

stated on December
15, 2020 a tweet:

**“68% error rate in
Michigan Voting
Machines. Should
be, by law, a tiny
percentage of one
percent.”**



By Paul Egan • December 15, 2020



**Russell James
Ramsland Jr.**

stated on November
24, 2020 an affidavit:

**In 10 Michigan
precincts, voter
turnout reached
100% and in 6
precincts it
surpassed 100%**



By Clara Hendrickson • December 4,



Mike Duggan

stated on November
29, 2020 an interview:

**“Detroit actually
has the lowest
infection rate in
the state of
Michigan. We’re
half of that of the
surrounding
suburbs.”**





By Paul Egan • December 15, 2020



By Clara Hendrickson • December 4, 2020



By Clara Hendrickson • December 1, 2020



AFFIDAVIT IN MICHIGAN LAWSUIT SEEKING TO OVERTURN ELECTION MAKES WILDLY INACCURATE CLAIMS ABOUT VOTE



YouTube videos

stated on December 26, 2020 in a viral video:

A registered nurse in Nashville, Tenn., developed Bell's Palsy after receiving the COVID-19 vaccine.

By Daniel Funke • December 30, 2020





Pat Toomey

stated on December 27, 2020 in an interview:

“In my state, as in many other states, we have governors who are closing down businesses again.”



By Jessica Calefati • December 30, 2020



North Carolina Republican Party

stated on December 27, 2020 in a tweet:

North Carolina Gov. Roy Cooper "has not left the Governor's Mansion since the start of the #COVID19 crisis."



By Paul Specht • December 29, 2020



Facebook posts

stated on December 28, 2020 in a video:

The Christmas Day explosion in Nashville, Tenn., was the result of a “missile strike.”



By Daniel Funke • December 29, 2020



Facebook posts

stated on December 29, 2020 in a Facebook post:





Facebook posts

stated on December 29, 2020 in a Facebook post:

News outlets reported that the Nashville bomber died of COVID-19.

By Samantha Putterman · December 29, 2020



Facebook posts

stated on December 27, 2020 in a Facebook post:

The Nashville bombing was an attempt to stop an AT&T audit into Dominion software and cover up election corruption.

By Samantha Putterman · December 29, 2020



Facebook posts

stated on December 28, 2020 in a photo caption:

Cornell University professor Robert Oswald said "COVID-19 was imaginary and fictitious."

By Daniel Funke · December 29, 2020



Facebook posts

stated on December 27, 2020 in social media posts:

Says a recent study found no asymptomatic





posts:

Says a recent study found no asymptomatic or presymptomatic spread of COVID.



By Louis Jacobson • December 28, 2020



Marco Rubio

stated on December 27, 2020 in a tweet:

Says "Dr. Fauci lied about masks in March."



By Jon Greenberg • December 28, 2020



Chuck Callesto

stated on December 22, 2020 in a tweet:

"HIDDEN in the 5,893 page bill that @realDonaldTrump is anticipated to VETO is a provision that says: "Nullifies the President's use of the Insurrection Act."



By Amy Sherman • December 23, 2020

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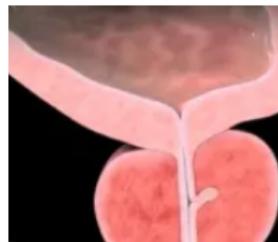
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Dr. Marty Nature's Blend



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Bernie Sanders
Nancy Pelosi
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