



OFFICE OF THE
STATE AUDITOR

December 19, 2024

The Honorable Sean Reyes
Attorney General
Utah State Capitol Complex
350 North State Street Suite 230
SLC UT 84114

Attorney General Reyes:

As you know, *Utah Code* 20A Part 9 “Candidate Qualifications and Nominating Procedures,” allows for an alternative path to the primary ballot through signature gathering via nomination petitions (Petitions). Due, in part, to concerns about fraudulent signatures on Petitions identified in a Washington County race, the Office of the State Auditor (OSA) reviewed a statistical sample of 1,252 Petition signatures for three statewide races and issued a report¹ concluding that it was statistically likely that each of the three candidates we reviewed met the statutory threshold allowing them access to the primary ballot. We identified one signature in our sample that appeared to be fraudulent. We also observed signatures that fell outside of our sample that were potentially fraudulent and were rejected and thus not counted by election workers. These potentially fraudulent signatures were turned over to your office for further investigation.

A couple of weeks later, your office requested our assistance to review signatures for all statewide and multi-county candidates as well as any other signatures gathered by individuals (circulators) who potentially engaged in signature fraud. Our objective was to identify Circulators who had a high rate of potentially fraudulent signatures and to refer the names of Circulators and associated signatures to your office for further investigation. As such, we performed the following procedures:

- We gained secure access to signature records on the Voter Information and State Tracking Application (VISTA).
- We created custom software that allowed auditors to efficiently query and compare Petition signatures against signatures on VISTA.
- We requested and obtained Petitions for all statewide and multi-county races.
- We obtained a number of county-level race Petitions.
- All Petitions were secured at all times, and the chain of custody was preserved.
- Each signature auditor completed and passed the same signature validation course utilized by the Lieutenant Governor’s Division of Elections in accordance with *Utah Code* 20A-1-107.

¹ Letter dated September 3, 2024 at <https://reporting.auditor.utah.gov/servlet/servlet.FileDownload?file=015Do0000017cLIIAI>

- We provided parameters for signature auditors to record anomalies and indications of potentially fraudulent signatures.
- We reviewed unprocessed Petitions² for indications of possible signature fraud.³

We completed our review and summarized the results for your information in the tables below. A number of Petitions were not available to us for review as they were already in the custody of various prosecuting authorities at the time of our review.

When election workers performed the original review of signatures, they either accepted or rejected each signature. Therefore, the signatures noted below may have been rejected and not counted toward the candidates' signature thresholds during the original review by election workers. Since our objective did not include comparing our results to the election worker's original decision, we make no comment on the accuracy of the original validation process performed.

Table 1: Review of Processed Petitions

Total Signatures Reviewed	301,866
Signatures where the handwriting appeared similar to nearby line in the Petition	1,782
Signatures where the handwriting appeared similar to multiple lines in the Petition	604
Other signatures that did not appear to match the signatures on file (not necessarily indicative of fraud)	10,884

We also reviewed 956 unprocessed Petitions that had not been previously reviewed by election workers and were therefore not recorded in VISTA. We did not attempt to count the total number of signatures on these petitions, nor did we compare all signatures in these unprocessed Petitions to VISTA. Rather, we reviewed the handwriting in each Petition for the anomalies noted in Table 2. None of the signatures in the unprocessed Petitions were counted toward any candidate's signature thresholds.

Table 2: Review of Unprocessed Petitions

Number of Unprocessed Petitions Reviewed	956
Signatures where the handwriting appeared similar to a nearby line in the Petition	129
Signatures where the handwriting appeared similar to multiple lines in the Petition	90

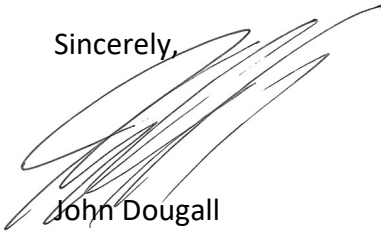
² A number of Petitions were not processed by election workers. This occurs when it is determined a candidate has reached the threshold for valid signatures or when it becomes clear that the candidate statistically cannot meet the required threshold.

³Unprocessed Petition data is not in VISTA which necessitated a different process for our review.

We have returned all Petitions. Therefore, any Petitions needed for further investigation that are not currently in your possession will need to be obtained directly from the appropriate custodian of those Petitions.

We appreciated the opportunity to assist your office with this review. Should you need further assistance, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "John Dougall", written over the word "Sincerely,".

John Dougall
State Auditor

cc: Lieutenant Governor Deidre Henderson