

Citizens Oversight Projects

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Shirley N. Weber, Ph.D.
Secretary of State
State of California

REF: [M2049](#)

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Formal Complaint Regarding Ownership Disclosure Deficiencies – Liberty Vote USA Inc.

Dear Secretary Weber and Legal Affairs Office:

Citizens Oversight submits this formal complaint regarding deficiencies in ownership disclosure filings associated with Liberty Vote USA Inc., as identified in records provided by your office in response to California Public Records Act (CPRA) requests dated January 13, 2026 and February 9, 2026.

This complaint is based on a review of the documents provided, including “Voting System Application Part 2 – Ownership & Control” for Liberty Vote USA Inc. and KnowInk LLC.

1. Defective Ownership Disclosure (Liberty Vote USA Inc.)

In the Liberty Vote USA Inc. filing (Part 2, Section (h)), the applicant identifies the entity holding more than 10% ownership interest as:

Liberty Vote USA Inc. → Liberty Vote USA Inc.

No parent entity, subsidiary structure, or natural person beneficial owner is disclosed.

Section (h) explicitly requires identification of all entities with greater than 10% ownership interest. A self-referential ownership declaration does not satisfy this requirement, as it fails to identify any actual controlling or beneficial ownership.

This creates a material deficiency in the disclosure, preventing determination of:

- Ultimate beneficial ownership
- Control relationships
- Potential conflicts of interest
- Regulatory compliance with certification requirements

2. Inconsistent Disclosure Compared to KnowInk LLC

In contrast, the KnowInk LLC filing (Part 2, Section (h)) identifies a natural person, Scott Leiendecker, as holding more than 10% ownership interest.

This demonstrates that:

- The disclosure requirement is understood and properly applied in at least one related filing
- Liberty Vote USA Inc.'s failure to identify any external ownership is not a structural limitation of the form

The inconsistency between these filings raises concern that Liberty Vote USA Inc. has not provided complete or accurate ownership information.

3. Missing Change-of-Control Documentation

Your office's response indicates that no records were located for:

“Statement of Change in Control and Ownership of Legal Entities for Liberty Vote USA Inc. (formerly Dominion Voting Systems)”

Given that Liberty Vote USA Inc. appears to have assumed ownership or control of previously certified Dominion systems, the absence of such documentation is highly concerning.

This raises the following possibilities:

- Required change-of-control filings were not submitted
- Records exist but were not produced
- Certification proceeded without full ownership disclosure

Any of these scenarios would represent a serious compliance issue. The absence of responsive records in the CPRA response cannot be attributed to indexing or retrieval limitations, as such limitations do not relieve the Secretary of State of its obligation under the California Public Records Act to conduct a reasonable search and produce all responsive records.

4. Regulatory Implications

Accurate ownership disclosure is essential to the integrity of California's voting system certification process. The current record prevents meaningful evaluation of:

- Who ultimately owns and controls Liberty Vote USA Inc.
- Whether ownership overlaps exist with other election infrastructure vendors (e.g., pollbook providers)
- Whether conflicts of interest or consolidation risks are present

Failure to disclose beneficial ownership undermines transparency and public confidence in the certification process.

5. Requested Clarifications and Actions

Citizens Oversight respectfully requests that the Secretary of State provide written clarification on the following:

1. Does the Secretary of State consider a self-referential ownership disclosure (an entity listing itself as its own >10% owner) to be compliant with Part 2, Section (h) requirements?
2. What entities or natural persons are recognized by the Secretary of State as the beneficial owners of Liberty Vote USA Inc.?
3. Was a Statement of Change in Control and Ownership submitted in connection with the transition from Dominion Voting Systems to Liberty Vote USA Inc.?
4. If such a statement exists, why was it not included in the CPRA response?
5. If such a statement does not exist, on what basis was certification or transfer of certification allowed to proceed?
6. Has the Secretary of State independently verified the ownership and control structure of Liberty Vote USA Inc., and if so, what documentation supports that determination?

6. Requested Remedies

We request that the Secretary of State:

- Require Liberty Vote USA Inc. to submit corrected and complete ownership disclosures identifying all entities and natural persons with greater than 10% ownership interest
- Provide any missing change-of-control documentation
- Review whether certification actions taken to date comply with statutory and regulatory requirements

7. Attachments

The following documents are included for reference:

- Liberty Vote USA Inc. – Voting System Application Part 2 (Ownership & Control)
- KnowInk LLC – Voting System Application Part 2 (Ownership & Control)
- CPRA response letters from the Secretary of State

These documents form the basis of the concerns described above.

Citizens Oversight appreciates your prompt attention to this matter and requests a written response addressing the issues raised herein.

Sincerely,



Raymond Lutz
Executive Director, Citizens Oversight