



OKLAHOMA STATE ELECTION BOARD

ALLEGATIONS OF IRREGULARITIES)
IN THE ELECTION FOR)
THE OFFICE OF STATE SENATE,)
DISTRICT 15)
CLEVELAND COUNTY) Cause No.: 2024-06
PETITIONER: ROBERT C. KEYES)

ORDER FOR HEARING

A petition alleging irregularities in the Runoff Election for State Senate, District 15, held on August 27, 2024 has been filed with the Secretary of the State Election Board.

A hearing to consider the allegations contained in said petition shall be conducted in Judge Balkman's Courtroom at the Cleveland County Courthouse, 200 S. Peters Ave., 2N, Norman, OK 73069 commencing at 8:30 a.m. on September 5, 2024.

Said hearing shall be conducted under the provisions of Article 8 of Title 26 of the *Oklahoma Statutes* and shall include the allegations of irregularities listed in said petition that occurred in the Counties or Precincts as enumerated in the attached petition. Additional allegations may be raised only if they were unknown at the time the petition was filed.

Dated this 30th day of August, 2024.

Handwritten signature of Paul Ziriaux in blue ink.

Paul Ziriaux

, State Election Board Secretary

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AUG 30 2024
STATE ELECTION
BOARD

**BEFORE THE OKLAHOMA STATE ELECTION BOARD
AND THE CLEVELAND COUNTY ELECTION BOARD**

In re **Robert C. Keyes**, candidate,)
Oklahoma Senate District 15)

Cause No.: 2024-06

PETITION ALLEGING IRREGULARITIES (OTHER THAN FRAUD)

I, the undersigned, was a candidate for the Office of Oklahoma State Senate District 15 at the Election conducted on August 27, 2024. I hereby challenge the announced results of that election, as provided by 26 O.S. § 8-120, based on the specific irregularities alleged below in the named counties and precincts, or in the casting of absentee ballots in the named counties. I accompany this petition with a cashier's check or certified check in the amount of Two Hundred Fifty Dollars (\$250.00) for each county affected by this petition.

I allege that irregularities stated herein are sufficient in number and of such nature as to:

- X Prove that I am lawfully entitled to be certified as the Republican Party nominee.
- X In the alternative, prove that it is impossible to determine with mathematical certainty which candidate is entitled to be certified as the Republican Party nominee.

I specifically allege the following irregularities in the Counties and Precincts Listed, or in the casting of absentee ballots:

1. The Oklahoma State Election Board's Unofficial Results page shows 4,953 votes cast, including 2,502 votes for candidate Lisa Standridge and 2,451 votes for candidate Robert C. Keyes. This is a margin of fifty-one (51) votes between the two candidates. See results.okelections.gov/OKER/?elecDate=20240827 (last accessed August 30, 2024).
2. Data from the Oklahoma Election Data Warehouse for the August 27, 2024, election (which is also available to the Oklahoma State Election Board) shows 5,004 votes cast, which is

fifty-one (51) votes less than the total reported on the Unofficial Results page. See Attached Affidavit of Dr. Nicole Kish, with supporting exhibits.

3. The Oklahoma Election Data Warehouse data further shows discrepancies for the following precincts, in some instances showing more votes than the Oklahoma State Election Board Unofficial Results and in some instances showing less:

<u>Precinct No.</u>	<u>Oklahoma State Election Board Unofficial Results</u>	<u>Oklahoma Election Data Warehouse</u>
140120	155 votes	158 votes
140122	62 votes	61 votes
140123	212 votes	224 votes
140125	68 votes	69 votes
140300	232 votes	233 votes
140301	351 votes	353 votes
140302	35 votes	36 votes
140304	418 votes	422 votes
140307	281 votes	283 votes
140308	84 votes	87 votes
140309	150 votes	151 votes
140317	235 votes	237 votes
140318	165 votes	169 votes
140342	105 votes	103 votes
140343	119 votes	121 votes
140344	168 votes	169 votes
140345	90 votes	91 votes
140346	71 votes	70 votes
140348	40 votes	42 votes
140351	139 votes	142 votes
140400	144 votes	151 votes
140402	205 votes	206 votes
140403	105 votes	104 votes
140404	178 votes	181 votes

Every effort has been made to ensure the accuracy of the above chart but the actual numbers reported in the Oklahoma State Election Board Unofficial Results and the Oklahoma Election Data Warehouse control.

The numbers show that there are a total of fifty-six (56) votes reflected in the Oklahoma Election Data Warehouse totals that are not reflected in the Oklahoma State Election Board

Unofficial Results and there are a total of five (5) votes reflected in the Oklahoma State Election Board Unofficial Results that are not reflected in the Oklahoma Election Data Warehouse totals. Thus, there is a potential discrepancy of up to sixty-one (61) votes. It is not possible simply to net the two numbers out because the discrepancies arise from different precincts and different voters.

It is necessary to determine why the Oklahoma Election Data Warehouse totals do not match the Oklahoma State Election Board Unofficial Results in every instance. Until the discrepancies involving sixty-one (61) votes are resolved, it is impossible to determine with mathematical certainty which candidate won the election when the current unofficial margin between the two candidates is fifty-one (51) votes.


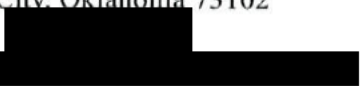
4. In addition to the foregoing, the Robert C. Keyes Campaign sent mailings to registered voters before the election. Eight (8) of the mailings were returned marked by the United States Post Office as "RETURN TO SENDER / NOT DELIVERABLE AS ADDRESSED / UNABLE TO FORWARD." Each of the eight (8) voters whose mailings were returned is reflected in the Oklahoma Election Data Warehouse as having voted in the August 27, 2024, runoff election. *See Attached Affidavit of Dr. Nicole Kish, with supporting exhibits.*

5. I have learned that my opponent, Lisa Standridge, delivered campaign literature to multiple voters with a message stating, "If you need a Notary, please call me and I will come to notarize your ballot. Call Kay Osborn [REDACTED]" *See Attached Sample Image.* I request that the Oklahoma State Election Board and/or the Cleveland County Election Board determine whether Ms. Osborn notarized more than twenty (20) ballots in violation of 24 O.S. § 14-108.1(C).

6. I further request that this Petition be set for hearing in compliance with 24 O.S. §§ 8-118 ("the secretary of the election board receiving the petition shall set a hearing" (emphasis added)).

Respectfully Submitted August 30, 2024,


ROBERT C. KEYES


Michael A. Furlong, OBA # 31063
STEPTOE & JOHNSON PLLC
210 Park Avenue, Suite 2300
Oklahoma City, Oklahoma 73102
Telephone: 

**ATTORNEY FOR CANDIDATE
ROBERT C. KEYES**