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NOTICE OF CLAIM

To: Attorney General Josh Kaul
Office of the Attorney General
114 East State Capitol
Madison, WI 53702-7857

Re: Second Claim of Peter Peckarsky - Announced Candidate for U.S. Senate

Circumstances of Claim

1. The purpose of this Notice of Claim submitted pursuant to Wis. Stat., §893.82 is to challenge the failure of the Wisconsin Elections Commission ("WEC") to conduct itself and Wisconsin elections in compliance with Wis. Stat. §5.905 and 5.91 in connection with the certification of Electronic Voting Systems ("EVS") for use in Wisconsin elections.

2. The State officials responsible for general oversight of the Wisconsin elections process are the members of the Wisconsin Elections Commission ("WEC"):

Chair Ann S. Jacobs
Vice-Chair Mark L. Thomsen
Secretary Marge Bostlemann
Commissioner Julie M. Glancey
Commissioner Dean Knudson
Commissioner Robert F. Spindell, Jr.

3. Wis. Stat. §5.02(4m) defines the term "Electronic Voting System." Wis.Stat. §5.02(4m) states in full that: "Electronic voting system" means a system in which votes are recorded on ballots, and the votes are subsequently counted and tabulated by automatic tabulating equipment. The term also includes a voting machine on which votes are recorded and tabulated by electronic means.

4. Wis. Stat. §5.905(1) provides that: "In this section, "software component" includes vote-counting source code, table structures, modules, program narratives and other human-readable computer instructions used to count votes with an electronic voting system."

1 5. Wis. Stat. §5.91 provides that no Electronic Voting System may be used in
2 Wisconsin unless it is certified by the WEC. Wis. Stat. §5.91 lists eighteen (18)
3 requirements which an EVS and its components must fulfill and bars WEC from
4 certifying any EVS or any of its components from being certified by WEC for use in
5 Wisconsin unless each of the eighteen (18) requirements are met. Wis. Stat. §5.91(13)
6 will be referred to in numbered paragraph 7 below.

7 6. The first paragraph of Wis. Stat. §5.91 states that: "No ballot, voting device,
8 automatic tabulating equipment, or related equipment and materials to be used in an
9 electronic voting system may be utilized in this state unless it is certified by the
10 commission. The commission may revoke its certification of any ballot, device,
11 equipment, or materials at any time for cause. The commission may certify any such
12 voting device, automatic tabulating equipment, or related equipment or materials
13 regardless of whether any such item is approved by the federal election assistance
14 commission, but the commission may not certify any ballot, device, equipment, or
15 material to be used in an electronic voting system unless it fulfills the following
16 requirements:"

17 7. Wis.Stat. §5.91(13) provides one of the eighteen (18) requirements referred to
18 in Wis.Stat. §5.91 and sets forth the requirement that: "(13) The automatic tabulating
19 equipment authorized for use in connection with the system includes a mechanism
20 which makes the operator aware of whether the equipment is malfunctioning in such
21 a way that an inaccurate tabulation of the votes could be obtained."

22 8. Wis. Stat. §5.905(2) requires that each vendor of an EVS certified under
23 Wis.Stat. §5.91 place in escrow with the commission itself certain software
24 components which the Commission determines necessary to enable review and
25 verification of the accuracy of the automatic tabulating equipment ("ATE") used to
26 record and tally the votes cast with the system.

27 9. Wis.Stat. §5.905(2) provides that: "The commission shall determine which
28 software components of an electronic voting system it considers to be necessary to
29 enable review and verification of the accuracy of the automatic tabulating equipment

1 used to record and tally the votes cast with the system. The commission shall require
2 each vendor of an electronic voting system that is approved under s. 5.91 to place
3 those software components in escrow with the commission within 90 days of the date
4 of approval of the system and within 10 days of the date of any subsequent change in
5 the components. The commission shall secure and maintain those software
6 components in strict confidence except as authorized in this section. Unless
7 authorized under this section, the commission shall withhold access to those software
8 components from any person who requests access under s. 19.35(1)."

9 10. Wis. Stat. §5.905(3) provides that: "The commission shall promulgate rules to
10 ensure the security, review and verification of software components used with each
11 electronic voting system approved by the commission. The verification procedure
12 shall include a determination that the software components correspond to the
13 instructions actually used by the system to count votes."

14 11. Wis. Stat. §5.905(4) provides that: "If a valid petition for a recount is filed under
15 s. 9.01 in an election at which an electronic voting system was used to record and tally
16 the votes cast, each party to the recount may designate one or more persons who are
17 authorized to receive access to the software components that were used to record and
18 tally the votes in the election. The commission shall grant access to the software
19 components to each designated person if, before receiving access, the person enters
20 into a written agreement with the commission that obligates the person to exercise the
21 highest degree of reasonable care to maintain the confidentiality of all proprietary
22 information to which the person is provided access, unless otherwise permitted in a
23 contract entered into under sub. (5)."

24 12. A significant "software component" (as defined in Wis.Stat. §5.905(1)) in an
25 EVS is the set of ballot definition files (BDF) that determine how the votes (the marks
26 a voter places on a ballot) will be counted in the EVS for each candidate. The ballot
27 definition files are produced after the contents of the ballot are determined which
28 happens after the results are certified for the primary election in which the candidates
29 for the general election are nominated. Accomplishing the review and verification of

1 the accuracy of the ATE in an EVS before an election is impossible without complete
2 access to the BDF for each EVS in each ward.

3 13. On Dec. 9, 2021, The Columbus Free Press published the attached article with
4 an accompany spreadsheet (all of which are Attachment 1). The title of the article is:
5 "Does The Wisconsin Elections Commission Fully Comply With Wisconsin Law About
6 Software In Electronic Voting Systems?" The spreadsheet in Attachment 1 is a public
7 record requested by the newspaper and provided by WEC in accord with the
8 Wisconsin public records law, Wis.Stat. §19.35.

9 14. According to the attached article, Commission spokesperson Reid Magney
10 wrote via e-mail to the newspaper on Feb. 23, 2021 in response to an Oct. 12, 2020,
11 public records request. Mr. Magney's Feb. 23, 2021 e-mail is a public record.
12 According to the article, the full text of Mr. Magney's Feb. 23, 2021 e-mail is as follows:

13 Thank you for your reminder email. I must apologize, as I initially misread your
14 request and thought it was more complicated than it is. I had to take out some
15 of the parenthetical terms in your request to understand exactly what you were
16 requesting. Here's what I believe you are requesting. 1. All records showing
17 (by manufacturer and by system) the date the software components were first
18 placed in escrow with the WEC. 2. All records showing (by manufacturer and
19 by system) that as of October 12, 2020, the software components were in escrow
20 with the WEC. I think you may have misunderstood how escrow works. Voting
21 equipment manufacturers do not place software in escrow with the WEC. WEC
22 never receives voting system software from the manufacturers. They place
23 software in escrow directly with the WEC's escrow company. If it becomes
24 necessary, WEC is able to access the software from the escrow company. We
25 are now working on getting the information you requested from the escrow
26 company, and we will fulfill your request as soon as possible.

27
28 15. According to the article, the spreadsheet was sent to the newspaper by e-mail
29 from a WEC Staff Attorney on Nov. 18, 2021. As per Mr. Magney's Feb. 23, 2021 e-
30 mail, the spreadsheet does list the date certain software was deposited in escrow with
31 WEC's escrow company. Mr. Magney's e-mail makes it clear that voting system
32 software is not deposited in escrow with WEC as required by statute.

33 16. The spreadsheet shows no deposit of software anywhere after January 17, 2020.
34 In short, the spreadsheet shows the BDF for all 2020 elections for the ES&S, Dominion,

1 and Sequoia EVS were not deposited in escrow with WEC or its escrow company. The
2 spreadsheet shows the BDF for the 2020 elections held in April 2020 or later using an
3 EVS from the Clear Ballot Group were not deposited in escrow with WEC or its escrow
4 company.

5 17. Further, the dates on the spreadsheet indicate the BDF were not deposited in
6 escrow with WEC or its escrow company for any EVS for the elections in 2008, 2010,
7 2012, 2016, or 2018.

8 18. On information and belief, the automatic tabulating equipment ("ATE")
9 authorized for use in Wisconsin in connection with the various EVS certified for use in
10 Wisconsin do not include a mechanism which makes the operator aware of whether
11 the equipment is malfunctioning in a way that an inaccurate tabulation of the votes
12 could be obtained. By way of non-limiting example, the ATE authorized for use in
13 Wisconsin in connection with the various EVS certified for use in Wisconsin do not
14 include a mechanism which makes the operator aware of whether the ballot definition
15 files are tabulating the votes inaccurately for a given candidate or referendum so long
16 as the total votes (including undervotes) for a given race or referendum do not exceed
17 the number of ballots being tabulated.

18 19. Thus, the ATE authorized for use in Wisconsin in connection with the various
19 EVS certified for use in Wisconsin do not fulfill the requirements of Wis.Stat. §5.91(13).
20 Accordingly, the commission did not have the authority to certify such equipment for
21 use in Wisconsin. In certifying such equipment, the commission exceeded its authority
22 and acted in a manner not in accord with Wisconsin law. Pursuant to Wis.Stat. §5.91,
23 the Commission should immediately revoke its certification of the equipment for
24 cause to the extent there is no mechanism in the ATE which makes the operator aware
25 of whether one or more ballot definition files are malfunctioning in such a way that an
26 inaccurate tabulation of the votes could be obtained.

27 20. The Commission has also not fulfilled its duties under Wis.Stat. §5.905(2) in
28 various ways.
29

1 21. First, Wis. Stat. §5.905(2) requires that the WEC require each vendor of an EVS
2 certified under Wis.Stat. §5.91 to place designated software components in escrow
3 with the Commission within 90 days of the date of approval of the system. As shown in
4 Attachment 1, the commission spokesperson confirmed in writing that the
5 Commission never placed any software in escrow with the commission.

6 22. Second, Wis. Stat. §5.905(2) requires that the WEC require each vendor of an
7 EVS certified under Wis. Stat. 5.91 to place any changes to the designated software
8 components in escrow with the Commission within 10 days of the date of any change
9 in the designated components. As shown in Attachment 1, the Commission
10 spokesperson confirmed in writing that the commission never placed any software in
11 escrow with the commission.

12 23. Third, Wis.Stat. sec. 5.905(2) requires the WEC to “determine which software
13 components of an electronic voting system it considers to be necessary to enable
14 review and verification of the accuracy of the automatic tabulating equipment used to
15 record and tally the votes cast with the system.” Without the BDF, the software listed
16 on the spreadsheet in Attachment 1 is insufficient to enable review and verification of
17 the accuracy of the automatic tabulating equipment (“ATE”) used to record and tally
18 votes cast with each system. Thus, even though the WEC may have made a
19 determination, that determination is insufficient to achieve the intent of the statutes
20 (Wis. Stat. §5.905(2) and Wis. Stat. §5.91(13)) which is to verify the accuracy of the
21 vote count determined by the ATE in the EVS.

22 24. The Commission has not fulfilled its duties under Wis. Stat. §5.905(3).

23 25. Wis.Stat. §5.905(3) requires a verification procedure (to verify the software
24 components used with each EVS approved by the WEC) which includes a
25 determination that the software components correspond to the instructions actually
26 used by the system to count votes. The BDF contain some or all of the instructions
27 actually used by the system to count votes. As discussed above, the BDF were not
28 placed in escrow with WEC or its alleged escrow company for various elections in
29 2008, 2010, 2012, 2016, 2018, and 2020. Without access to the BDF, the WEC could not

1 make a determination that any software components corresponded to the instructions
2 actually used by the system to count votes.

3 26. The Commission has not in the past met its obligations under Wis.Stat. §5.905(4)
4 and is apparently not prepared to do so in 2022.

5 27. The Wisconsin election statutes and Wis. Stat. §5.905(4) require that in the event
6 of a recount the Commission provide immediate access to the software components
7 used to record and tally the votes to each party to a recount and its designees who
8 agree in writing to exercise the highest degree of reasonable care to maintain the
9 confidentiality of all proprietary information to which they are provided access. The
10 software components used to record and tally the votes include the BDF which have
11 not been placed in escrow with the Commission or its alleged escrow company for
12 most elections in the recent past.

13 28. Any recount of the August 9, 2022 primary must be resolved in time to
14 determine who will be on the November 8, 2022 ballot. According to the article in
15 Attachment 1, after the November 2016 election there was a three-year delay in even
16 determining the procedure to grant the statutorily required access to the software
17 components to recount participants. A similar delay in the August 2022 recount would
18 mean the State of Wisconsin might have to function without up to five (5) elected
19 statewide officials, a U.S. Senator elected for the term starting in January 2023, up to
20 eight (8) elected members of the U.S. House of Representatives for more than a full
21 two year term, ninety-nine (99) elected members of the Wisconsin Assembly for more
22 than a full two year term, and up to seventeen (17) elected members of the Wisconsin
23 Senate for over 3 years out of a 4 year term. The WEC should be prepared to meet its
24 statutory obligation to provide immediate access to the software components
25 including the BDF files for every ward in the state to the recount parties and their
26 designees.

27 Relief Sought

28 29. The Wisconsin Elections Commission should require: (a) that all software
29 components for all EVS certified to be used in Wisconsin will be placed in escrow with

1 the WEC on or before Dec. 30, 2021, (b) that all ballot definition files for each ward for
2 the elections held on August 11, 2020 and November 3, 2020 will be placed in escrow
3 with the WEC on or before Dec. 30, 2021 and maintained securely in escrow until
4 October 31, 2023, and (c) all changes to any software components for any EVS
5 certified to be used in Wisconsin be placed in escrow with the WEC within 10 days
6 after the date of the change.

7 30. The Wisconsin Elections Commission should require for future elections that:
8 four (4) copies of each ballot definition file ("BDF") for each EVS in each ward will be
9 placed in escrow with WEC on non-volatile memory (e.g., a thumb drive with no
10 battery or internal power source) delivered to WEC ten (10) days after the ballot
11 contents are determined. The chief inspector of each ward at which an EVS is used
12 will appear in Madison at WEC at a public session one day after the BDF are delivered.
13 The chief inspector will select one of the four identical thumb drives and install that
14 BDF on the EVS in the inspector's ward. The other three BDF from the ward will remain
15 in escrow with the WEC in its securely and continuously (24/7) guarded offices for 22
16 months after the day of the general election and will be made immediately available
17 to parties to a recount in accord with Wis.Stat. §5.905(4).

18 31. Claimant intends to file a legal action seeking a declaratory judgment that the
19 above-mentioned failures violate Wis. Stat. §5.905 and §5.91.

20 32. Claimant also intends to seek both a preliminary injunction and a permanent
21 injunction requiring the Wisconsin Elections Commission to ensure that in the event
22 EVS are used in future Wisconsin elections, ballot definition files and all other software
23 components are properly escrowed with the commission and immediately made
24 available in case of a recount as required pursuant to Wis. Stat. §5.905 and any other
25 applicable statutes.

26 33. In the alternative, claimant will seek a preliminary and permanent injunction
27 barring the use of EVS and ATE in Wisconsin elections.
28
29

1
2
3 Date: December 20, 2021

4 Peter Peckarsky
5 Claimant Peter Peckarsky
6
7

8 State of Wisconsin)
9) ss.
10 Milwaukee County)
11

12 Subscribed and sworn to before me on

13 12/20/2021
14

15 Robert Pled
16

17 Notary Public, Milwaukee, Wisconsin

18 My commission expires: permanently
19





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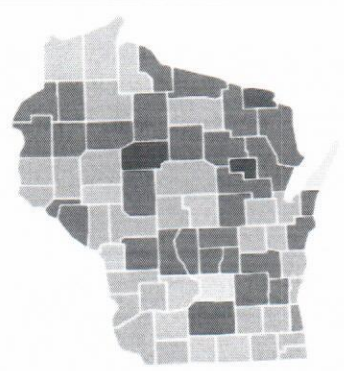


BUCKEYE
HEALTH

Does The Wisconsin Elections Commission Fully Comply With Wisconsin Law About Software In Electronic Voting Systems?

by Marji L. Berkowitz

DECEMBER 9, 2021



Wisconsin Presidential Election Results 2020,
Image courtesy of [AdamG2016](#)

It appears possible that since November 2006, no Wisconsin statewide election has been conducted in full compliance with Wisconsin law according to public records sent to the *Columbus Free Press* by the Wisconsin Elections Commission.

Most of the election administration authorities in Wisconsin use an electronic voting system ("EVS") to count the ballots.

Since 2006, any EVS used to count votes in Wisconsin had to be certified for use by the Wisconsin Elections Commission or its predecessors. Within 90 days after approval of a given EVS, the EVS manufacturer must place certain software components in escrow with the commission. Within 10 days after any change in the software components, the changed software components must be placed in escrow with the commission.

There are two main types of software in an EVS.

First, there is the software in the EVS when the software is first installed and upgrades to such software.

Second, there are ballot definition files (BDF) which determine how the votes (the marks a voter places on a ballot) will be counted for each candidate. The ballot definition files are produced

Attachment
1

after the contents of the ballot are determined which happens (for a general election) after the results are certified for the primary election in which the candidates for the general election are nominated.

According to the public records (a Feb. 23, 2021 e-mail and a Nov. 18, 2021 e-mail with an attached spreadsheet) sent by the commission in response to a public records request from the *Columbus Free Press*, the commission has never placed either the software first installed in the machines or the ballot definition files in escrow with the commission.

In case of a recount, the commission is required by law to give immediate access to the software components to the candidates who are parties to the recount and their designees as soon as they agree in writing to maintain the confidentiality of any proprietary information in the software components to which they are given access.

In 2016, presidential candidate Jill Stein was a party to a Wisconsin recount. In 2020, after several years of litigation, a court decided the final details of the procedure by which Dr. Stein's designees could have access to the software components from the EVS used in the November 2016 election. By the time the court decided the issue, another party to the recount had been President of the United States of America for more than three years.

It remains to be seen what the commission would do about meeting its statutory obligation to provide access to the software components to parties to any recount in 2022 or later years.

The statute which requires that the software be in escrow with the commission is Wis. Stat. section 5.905(2).

Wis.Stat. section 5.905(2) provides in pertinent part that: "The commission shall determine which software components of an electronic voting system it considers to be necessary to enable review and verification of the accuracy of the automatic tabulating equipment used to record and tally votes cast with the system. The commission shall require each vendor of an electronic voting system that is approved under s. 5.91 to place those software components in escrow with the commission within 90 days of the date of approval of the system and within 10 days of the date of any subsequent change in the components."

The statute which requires the commission to grant candidates involved in a recount access to the software components is Wis. Stat. Section 5.905(4).

Wis. Stat. section 5.905(4) provides in pertinent part that: "If a valid petition for a recount is filed under s. 9.01 in an election at which an electronic voting system was used to record and tally the votes cast, each party to the recount may designate one or more persons who are authorized to receive access to the software components that were used to record and tally the votes in the election. The commission shall grant access to the software components to each designated person if, before receiving access, the person enters into a written agreement with the commission that obligates the person to exercise the highest degree of reasonable care to maintain the confidentiality of all proprietary information to which the person is provided access, unless otherwise permitted in a contract entered into under sub. (5)."

On Oct. 12, 2020, the *Columbus Free Press* filed a public records request with the commission. The request sought 1) the public records showing the date software components were first placed in escrow with the commission for each EVS and 2) the public records showing the software components were in escrow with the commission on Oct. 12, 2020.

In the Oct. 12, 2020 public records request, the term "software component" was defined as it is defined in Wis. Stat. section 5.905(1) which provides in full that: "In this section, "software component" includes vote-counting source code, table structures, modules, program narratives and other human-readable computer instructions used to count votes with an electronic voting system."

In the Oct. 12, 2020 public records request, the definition of the term "electronic voting system" followed the statutory definition in Wis. Stat. section 5.02(4m).

The Oct. 12, 2020 public records request stated that: "This request only seeks public records related to electronic voting systems and software components of such systems approved for use by the Wisconsin Elections Commission (the Wisconsin Elections Commission may be referred to in this document as "WEC") in the November 3, 2020 elections."

The Oct. 12, 2020 public records request sought verbatim:

"1. All records showing (by manufacturer and by system) the date the software components (used to record and tally votes cast in any electronic voting system used to record and tally votes cast which system was approved for use in Wisconsin by the Wisconsin Elections Commission (WEC) for the Nov. 3, 2020 election) were first placed in escrow with the WEC. (This request does not seek records of software components placed in escrow with Escrow Tech International, Inc. or any private company or entity other than the WEC.)

2. All records showing (by manufacturer and by system) that as of October 12, 2020, the software components (used to record and tally votes cast in any electronic voting system used to record and tally votes cast which system was approved for use by the Wisconsin Elections Commission (WEC) for the Nov. 3, 2020 election) were in escrow with the WEC. (This request does not seek records of software components placed in escrow with Escrow Tech International, Inc. or any private company or any entity other than the WEC.)"

On Feb. 23, 2021, commission spokesperson Reid Magney wrote to the *Columbus Free Press* via email (a public record) in response to the Oct. 12, 2020 public records request and confirmed the commission never had the software components in escrow with the commission. Commission spokesperson Magney wrote on Feb. 23, 2021 in full as follows (underlining in original):

"Thank you for your reminder email. I must apologize, as I initially misread your request and thought it was more complicated than it is."

"I had to take out some of the parenthetical terms in your request to understand exactly what you were requesting. Here's what I believe you are requesting:"

"1. All records showing (by manufacturer and by system) the date the software components were first placed in escrow with the WEC."

"2. All records showing (by manufacturer and by system) that as of October 12, 2020, the software components were in escrow with the WEC."

"I think you may have misunderstood how escrow works. Voting equipment manufacturers do not place software in escrow with the WEC. WEC never receives voting system software from the manufacturers. They place software in escrow directly with the WEC's escrow company. If it becomes necessary, WEC is able to access the software from the escrow company."

"We are now working on getting the information you requested from the escrow company, and we will fulfill your request as soon as possible."

On Nov. 18, 2021, WEC Staff Attorney Brandon Hunzicker wrote to the *Columbus Free Press* via email which said in part that:

"This e-mail is in response to your public records request of October 12, 2020. Attached is an Excel spreadsheet that fulfills your request."

"A copy of the Excel spreadsheet sent on November 18, 2021 is in the Associated Files section following the article."

The information shown in the Excel spreadsheet and the February 23, 2021 e-mail indicate that the commission has never had the software components or the ballot definition files in escrow with the commission (as opposed to a private escrow company).

In addition to the software components which exist when an EVS is certified, a ballot definition file is needed for each election to tell the EVS how to count, for example, the marks placed on a paper ballot to designate the voter's votes.

The ballot definition files are coded after the number of candidates to appear on the ballot is determined after any necessary primary.

The public record sent by the WEC on November 18, 2021 and the February 23, 2021 e-mail also indicate that the commission did not have the ballot definition files for the November general election in escrow with the commission or a private escrow company in 2008, 2010, 2012, 2016, 2018, or 2020.

For 2008, 2010, 2012, 2016, and 2018, there are no entries for Date of Escrow Deposit listed in the spreadsheet sent on Nov. 18, 2021 which indicates no software components were deposited

with the commission or a private escrow company for the first time in any of these years.

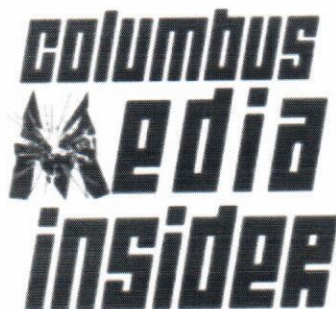
In 2020, the only Date of Escrow Deposit listed in the spreadsheet was January 17, 2020 which was well before the ballot definition files could be coded after the primary held in August to determine the complete list of candidates for the November general election.

Assistance with this article was provided by Peter Peckarsky who is a candidate for the Democratic nomination for a U.S. Senate seat representing Wisconsin and who assisted the 2020 recount effort of Dr. Jill Stein.

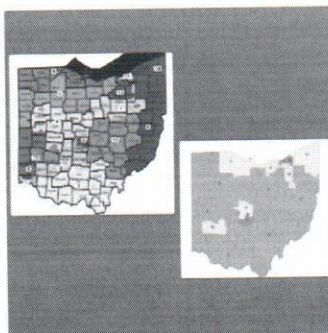
Associated Files:

 [Nov. 18 spreadsheet.pdf](#)

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Vendor	System Version used Nov 2020	Date of Escrow Deposit
Clear Ballot Group	ClearVote 2.0	January 17 2020
ES&S	Unity 3.0.1.0 Unity 3.4.1.0 EVS 5.2.0.0 EVS 5.2.2.0 EVS 5.3.0.0 EVS 5.3.2.0 EVS 5.3.4.0 EVS 5.3.4.1 EVS 6.0.4.0 EVS 6.0.5.0	November 6 2006 September 29 2015 September 17 2014 August 16 2017 September 17 2014 August 16 2017 August 6 2019 December 13 2019 October 14 2019 October 14 2019
Dominion	Democracy Suite 4.14	September 16 2015
Sequoia (DVS owned)	APXK2.10/HPX K1.42 (Insight) 5.024 (Edge)	November 3 2006