

**ELECTION
FRAUD**

**LEGAL
DOCUMENTS**

**COMPLAINT FILING
(MAY 2020)**

Min Kyung-wook

Synopsis for “Complaint Filing May 2020”

This complaint alleging electoral misconduct in the April 15, 2020 election was filed with the South Korean Supreme Court by plaintiff Min Kyung Wook, candidate of the United Future Party in the Yeonsu-gu district. The defendants are Kwon Soon Il, Chairman of the National Election Commission, and Seo Bomin, Chairman of the Election Commission of Yeonsu-gu, Incheon. The relief sought is to invalidate the results of the 21st National Assembly election for the district of Yeonsu-gu, Incheon City.

The complaint alleges the electoral process was fatally flawed and cites violations of the Public Official Election Act that include: 1) irregularities involving the ballot counting machines used in the election; 2) illegal use of QR codes in the voting process; 3) use of invalid ballot papers; 4) other specific violations as described in the lawsuit.

Plaintiff argues that the Defendants are responsible, either by negligence or intentional acts for the aforementioned irregularities that tainted the April 15th, 2020 election. It is argued that the alleged misconduct poses a risk to South Korea’s democratic electoral system both now and into the future.

Complaint

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Confirmation of Invalidity in the National Assembly elections

DEMANDS OF THE COMPLAINT

We seek judgment for the following:

1. The 21st National Assembly election for the district of Yeonsu-gu of Incheon City that was administered on April 15, 2020 be confirmed invalid.
2. Legal costs shall be borne by the defendant(s).

REASONS FOR THE COMPLAINT

1. The Status of the Involved Parties

The plaintiff was a candidate of the United Future Party during the 21st general election that was conducted on April 15, 2020 in the Yeonsu-gu district and won the most votes in the district on election day.

Defendant Kwon, Soon-il was the chairman of the National Election Commission for the 21st National Assembly election on April 15, 2020.

Defendant Seo, Bomin was the chairman of the election commission of the Yeonsu-gu district, Incheon who oversaw the 21st general election on April 15, 2020. On the basis of Clause 1 of Article 222 of the Public Official Election Act, he befits the status of a defendant of this election litigation case.

2. Summary of the Reasons Why the 21st General Election Should Be Found Invalid

The summary of reasons why the 21st general election is invalid in all districts including the Yeonsu-gu district is as follows:

3. The result of the 21st general election was tainted due to outside influences.

4. There was fraud in the ballot counting of the 21st general election where the ballot counting machines made by the company that were contracted had supplied ballot counting machines to the Congo's fraudulent election.

5. QR code that played a major role in the Congo's fraudulent election was also used in the 21st general election, but QR code is a means not allowed by law.

6. Also, the invalid ballot papers that were used in the 21st general election should

invalidate the 21st general election by the Public Official Election Act.

I would like to change the terms below and described them in order:

7. The result of the 21st general election was tainted by outside influences, which was confirmed by Korea's top statistician and statistical physicist, and a world's top expert in detecting fraudulent elections.

As seen below, the result of the 21st general election was manipulated and the suspicion that it was tainted was raised even as the results were coming in the following day. The contributing factors are: (1) the fact that, in many voting districts including Yeonsu-gu district, the rate of Outside Jurisdiction early votes and Inside Jurisdiction early votes are the same, and (2) the early voting rate for Democratic Party of Korea candidates was about 12% higher than election day vote in almost all regions (Seoul, Gyeonggi, Incheon, Daejeon, Chungcheong, Gyeongnam, Busan, with the exception for Gwangju and Jeonnam) but the rate was about 12% lower for United Future Party candidates including the plaintiff, which are accurately computed results.

The fact that 253 districts with different trends and different issues have shown results of a computationally regular pattern implies that the election result was artificially manipulated.

8. Within the Yeonsu-gu district the early vote rates for the Outside Jurisdiction votes and Inside Jurisdiction votes are the same down to the 2nd decimal place, which is a rare phenomenon.

As it was mentioned before, there is a correlation among the candidates' vote gain rates in both the Outside Jurisdiction and Inside Jurisdiction early votes in the Yeonsu-gu district, and the same is shown in the figures above for the 3 candidates for the Yeonsu-gu district.

Party Name Candidate Name	United Future Party Min, Kyung- wook (Plaintiff)	Democratic Party of Korea Chung, Il-yung	Justice Party Lee, Jung-mee
Outside Jurisdiction early votes	4,460	6,185	2,073
Inside Jurisdiction early votes	11,335	15,797	5,296
Outside Jurisdiction early	<u>0.393471</u>	<u>0.391530</u>	<u>0.391427</u>

votes/Inside Jurisdiction early votes			
Vote gain rate among the Inside Jurisdiction early votes	<u>34.86%</u>	<u>48.58%</u>	<u>16.28%</u>
Vote gain rate among the Outside Jurisdiction early votes	<u>34.86%</u>	<u>48.35%</u>	<u>16.2%</u>

(Excerpt from Exhibit No. 1 The 21st general election results table from Yeonsu-gu district in Incheon)

What it means for the number 0.39 which was found by Outside Jurisdiction early votes divided by the Inside Jurisdiction early votes, if the plaintiff received 100 votes in the Inside Jurisdiction early voting, would receive 39 votes in the Outside Jurisdiction early voting.

But according to the result table above, candidate Chung Il-yung would also get 39 Outside Jurisdiction early votes if 100 Inside Jurisdiction votes are received, as well as candidate Lee Jung-mee would receive 39 Outside Jurisdiction early votes if 100 Inside Jurisdiction early votes are counted.

Also, the plaintiff's vote gain rates for both Inside Jurisdiction early votes and Outside Jurisdiction early votes are the same at 34.86%. If all three candidates' Inside Jurisdiction early votes and Outside Jurisdiction early votes are counted and compared, no matter what, the plaintiff is always at 34.68%. **As shown above, the same can be applied for candidates Chung and Lee that the same rate of Outside Jurisdiction early votes divided by Inside Jurisdiction early votes is at the same fixed rate.** That is, for all three candidates, the Inside Jurisdiction early votes and the Outside Jurisdiction early vote rates are the same. Such phenomenon can hardly happen without outside interference.

Party Name Candidate Name	Saenuri Party Min, Kyung-wook (Plaintiff)	Democratic Party of Korea Yoon, Jong-gi	People's Party Han, Kwang-won
Outside Jurisdiction early votes	2,207	2,218	1,018
Inside Jurisdiction early votes	3,853	3,602	1,577

Outside Jurisdiction early votes/Inside Jurisdiction early votes	0.44999	0.362422	0.187588
vote gain rate among the Inside Jurisdiction early voters	42.65%	39.88%	17.46%
vote gain rate among the Outside Jurisdiction early voters	40.54%	40.74%	18.7%

Such numerical results are not natural and is a result of applying some mechanical formula, which becomes clearly obvious when compared to the election results of the 20th general election of the same district, Yeonsu-gu, shown in the table above.

(Excerpt from Exhibit No. 2 The 20th general election results table from Yeonsu-gu district in Incheon)

9. Not only in the Yeonsu-gu district but nationally in other districts there is a trend that the Inside Jurisdiction early votes vs. the Outside Jurisdiction early vote gain rates are the same.

The Inside Jurisdiction early votes being the same compared to the Outside Jurisdiction early vote gain rates is not just an occurrence limited to the Yeonsu-gu district, but it's been found to have happened in various districts like Seoul, Incheon, and Gyeonggi. This fact supports the argument that this is not an isolated event in just the Yeonsu-gu district.

Jongro District	UFP Hwang Kyo-ahn	DPK Lee Nak-yeon
Outside Jurisdiction Early Votes	3,169	6,472
Inside Jurisdiction Early Votes	11,777	24,093
Outside/Inside Jurisdiction Votes Ratio	<u>0.26</u>	<u>0.26</u>
Seoul Songpa district	UFP Kim Keun-shik	DPK Nam Insoon
Outside Jurisdiction Early Votes	4,992	8,377

Inside Jurisdiction Early Votes	15,684	26,646
Outside/Inside Jurisdiction Votes Ratio	<u>0.31</u>	<u>0.31</u>
Seong-nam Boondang Eul district	UFP Kim Minsoo	DPK Kim Byung-wook
Outside Jurisdiction Early Votes	4,488	7,008
Inside Jurisdiction Early Votes	15,208	23,826
Outside/Inside Jurisdiction Votes Ratio	<u>0.29</u>	<u>0.29</u>
Seong-nam Boondang Gab district	UFP Kim Eunhae	DPK Kim Byung-gwan
Outside Jurisdiction Early Votes	5,360	7,530
Inside Jurisdiction Early Votes	19,087	26,790
Outside/Inside Jurisdiction Votes Ratio	<u>0.28</u>	<u>0.28</u>
Incheon Seo-gu Gab district	UFP Lee Hakjae	DPK Kim Kyo-heung
Outside Jurisdiction Early Votes	4,069	6,625
Inside Jurisdiction Early Votes	16,177	25,722
Outside/Inside Jurisdiction Votes Ratio	<u>0.25</u>	<u>0.25</u>
Incheon Namdong-Gab district	UFP Yoo Jungbok	DPK Maeng Sung-gyu
Outside Jurisdiction Early Votes	4,966	8,059
Inside Jurisdiction Early Votes	13,959	22,911
Outside/Inside Jurisdiction Votes Ratio	<u>0.35</u>	<u>0.35</u>

Also, as can be seen in the table below, there are at least 80 candidates with the same Inside Jurisdiction and Outside Jurisdiction early voting rates being at 99.00% or more, which is as if a calculator was used to create abnormally identical rates for the Inside and Outside Jurisdiction early votes within the 21st general election.

District	Party	Candidate	Early In Votes	Early Out Votes	Early In Votes Rate	Early Out Votes Rate	Sync Rate
성남시분당구갑	DPK	김병관	26790	7530	0.583952743	0.584173778	99.96%
성남시분당구갑	UFP	김은혜	19087	5360	0.416047257	0.415826222	99.95%
종로구	DPK	이낙연	24093	6472	0.671675495	0.671299658	99.94%
안산시단원구갑	DPK	고영인	12703	3533	0.629952889	0.630555506	99.90%
종로구	UFP	황교안	11777	3169	0.328324505	0.328700342	99.89%
성남시분당구을	DPK	김병욱	23826	7008	0.610390941	0.60960334	99.87%
담양함평영광장성-영광	DPK	이개호	9833	2625	0.936922344	0.938170122	99.87%
안산시단원구갑	UFP	김명연	7462	2070	0.370047111	0.369444494	99.84%
전주시병	DPK	김성주	40736	11771	0.71344005	0.714823587	99.81%
성남시분당구을	UFP	김민수	15208	4488	0.389609059	0.39039666	99.80%
Yeonsoo-gu Eul	DPK	Jung Il-Yung	15797	6185	0.582227628	0.581023955	99.79%
수원시을	DPK	백혜련	23073	9728	0.675360028	0.676777515	99.79%
서구을	DPK	신동근	26671	7833	0.677978596	0.679770893	99.74%
Yeonsoo-gu Eul	UFP	Min Kyung-wook	11335	4460	0.417772372	0.418976045	99.71%
김포시갑	DPK	김주영	15444	5374	0.642723376	0.640600787	99.67%
남동구갑	DPK	맹성규	22911	8059	0.621399512	0.618733205	99.57%
광산구을	DPK	민형배	29475	12163	0.918338734	0.922347767	99.57%
수원시을	UFP	정미경	11091	4646	0.324639972	0.323222485	99.56%
부천시정	DPK	서영석	10815	5128	0.696080324	0.699209163	99.55%
구로구을	DPK	윤건영	19884	6247	0.675728947	0.678800391	99.55%
송파구병	DPK	남인순	26646	8377	0.629482636	0.626598848	99.54%
전주시병	Minsaeng	정동영	16362	4696	0.28655995	0.285176413	99.52%
중구성동구을	DPK	박성준	23498	7310	0.60191091	0.604982206	99.49%
서구을	UFP	박종진	12668	3690	0.322021404	0.320229107	99.44%
김포시갑	UFP	박진호	8585	3015	0.357276624	0.359399213	99.41%
양천구갑	DPK	황희	27221	8563	0.618870069	0.62317153	99.31%
남동구갑	UFP	유정복	13959	4966	0.378600488	0.381266795	99.30%
서귀포시	DPK	위성곤	19403	5304	0.6224097	0.618037753	99.30%
관악구갑	DPK	유기홍	28990	10803	0.972035944	0.964898178	99.27%
천안시병	DPK	이정운	11411	5188	0.617645467	0.613093831	99.26%
중구성동구을	UFP	지상욱	15541	4773	0.39808909	0.395017794	99.23%
송파구병	UFP	김근식	15684	4992	0.370517364	0.373401152	99.23%
중구성동구갑	DPK	홍익표	25989	7648	0.640296632	0.645400844	99.21%
서구갑	DPK	김교홍	25722	6625	0.613904866	0.619506265	99.10%
청주시흥덕구	DPK	도종환	23666	7445	0.627362617	0.633239772	99.07%
구로구을	UFP	김용태	9542	2956	0.324271053	0.321199609	99.05%
순천화천철원양구을-양구	DPK	정만호	2437	637	0.566349059	0.571813285	99.04%
정읍고창-고창	DPK	윤준병	10935	2260	0.762392805	0.769754768	99.04%
용산구	DPK	강태웅	24432	7555	0.579905533	0.585613518	99.03%
기장군	DPK	최택용	9707	3912	0.535558621	0.540854417	99.02%

(Excerpt from Exhibit No. 3 The list of candidates with Inside and Outside Jurisdiction rates are 99% or more identical in the 21st general election)

As can be seen above, there are 80 candidates whose Inside Jurisdiction and Outside Jurisdiction

early voting rates are 99% or more identical, which is very difficult to happen statistically. **This is a glaring example that this is not a natural election result and is a result of artificial manipulation.**

10. The discrepancy between each Yeonsu-gu district candidate's election day votes and early votes cannot be explained by a normal situation.

The plaintiff won regarding the election day votes in terms of the number of votes and percentage of votes as shown in the table below. (The percentages are the result of rounding up to the first decimal place.) And such results were consistent with the 3 main broadcasting station's exit poll and opinion poll within the margin of error.

Candidate Name	UFP Min Kyung-wook (Plaintiff)	DPK Chung Il-yung	Justice Party Lee Jungmee
Election day votes	33,932	30,575	15,798
Election day votes Rate	42.11%	37.94%	19.6%
3-broadcasting station's combined Exit Poll	40.0%	38.9%	20.7%
Final Opinion Poll	39.0%	36.7%	18.5%

But the result of the early votes was different as above, and the results are shown below. (The percentages are rounded up to the first decimal place.)

UFP Min Kyung-wook (Plaintiff)	DPK Chung Il-yung	Justice Party Lee Jungmee
15,795	21,982	7,369
34.9%	48.5%	16.2%

The age group that most actively participated in early voting of ages 50s and 60s were the ones who most actively support the plaintiff. From the last day of early voting until the day before Election Day, the United Future Party (UFP) had a problem of removing a candidate from the party due to the candidate's statement, which put the UFP candidates, including the plaintiff, at a disadvantage for election day votes.

Yet, against the expectation that the Election Day votes was going to be lower than the early voting, they received conflicting results of receiving more votes from the Election Day than early voting.

In addition, candidate Chung received 13.6% more votes than the plaintiff through early voting, but really on Election Day there were no unfavorable factors for the Democratic Party yet received a 10.6% reduction to his early voting results.

This shows a discrepancy with the results of the same district in the 20th general election. As shown in the table below, during the 20th general election, each candidate's difference between the Election Day votes and the early votes was at most at 4.06% and the difference among the prominent candidates' early votes was at about 1.5%.

Candidate Name	Saenuri Party Min Kyung-wook (Plaintiff)	DPK Yoon Jong-gi	The People's Party Han Kwang-won
Election day votes	26,706	21,509	11,133
Election day votes Rate	45%	36.24%	18.76%
Early Votes	6,256	6,031	2,677
Early Votes Rate	41.8%	40.3%	17.88%

(Excerpt from Exhibit No. 2 The results from the 20th general election in the Yeonsu-gu district)

11. Not only in the Yeonsu-gu district but also in Seoul, Gyeonggi, Incheon regions, there is a serious discrepancy between the early votes percentage and the election day votes percentage.

Not only is there the aforementioned problem of Inside Jurisdiction vs. Outside Jurisdiction early vote rates but in regions of Seoul, Gyeonggi and Incheon, which includes the plaintiff's district of Yeonsu-gu), which are known as fierce battlegrounds, the early voting rates between the Democratic Party of Korea and United Future Party were fixed to 63:36, causing a huge controversy.

Incheon region							
Party	Early In Votes	Early Out Votes	Early Votes	Rate	Election Day Votes	Rate	Difference
DPK	262,629	86,238	348,867	63.22	447,157	54.06	-9.16
UFP	156,158	46,799	202,957	36.78	380,000	45.94	9.16
㉞	418,787	133,037	551,824	26.44	827,157	8.12	

Kyung-gi region							
Party	Early In Votes	Early Out Votes	Early Votes	Rate	Election Day Votes	Rate	Difference
DPK	1,142,185	405,772	1,547,957	63.14	2,249,417	52.66	-10.48
UFP	676,204	227,375	903,579	36.86	2,021,965	47.34	10.48
㉞	1,818,389	633,147	2,451,536	26.28	4,271,402	5.32	

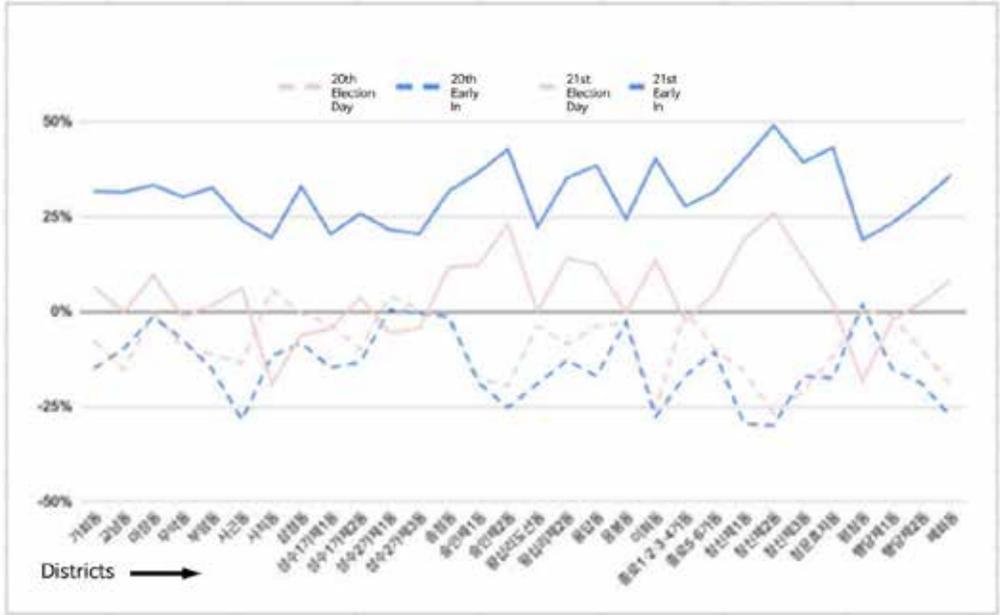
Seoul region							
Party	Early In Votes	Early Out Votes	Early Votes	Rate	Election Day Votes	Rate	Difference
DPK	1,036,106	203,368	1,239,474	63.64	1,627,796	50.72	-12.92
UFP	693,664	113,945	807,609	36.36	1,581,821	49.28	12.92
㉞	1,629,790	317,313	1,947,103	27.28	3,209,617	1.43	

Such unexpected results between the Democratic Party of Korea and United Future Party was as if they were fixed in advance. (In the Yeonsu-gu district, the ratio of the Democratic Party of Korea + the Justice Party vs. the United Future Party is about the same, i.e., 64.7 to 34.9.)

As for such election results, the National Election Commission clearly confirmed in a press release that, "The average early votes ratio between the Democratic Party of Korea and the United Future Party candidates in the Seoul, Incheon and Gyeonggi regions are Seoul 63.95 : 36.05, Incheon 63.43 : 36.57 and Gyeonggi 63.58 : 36.42."

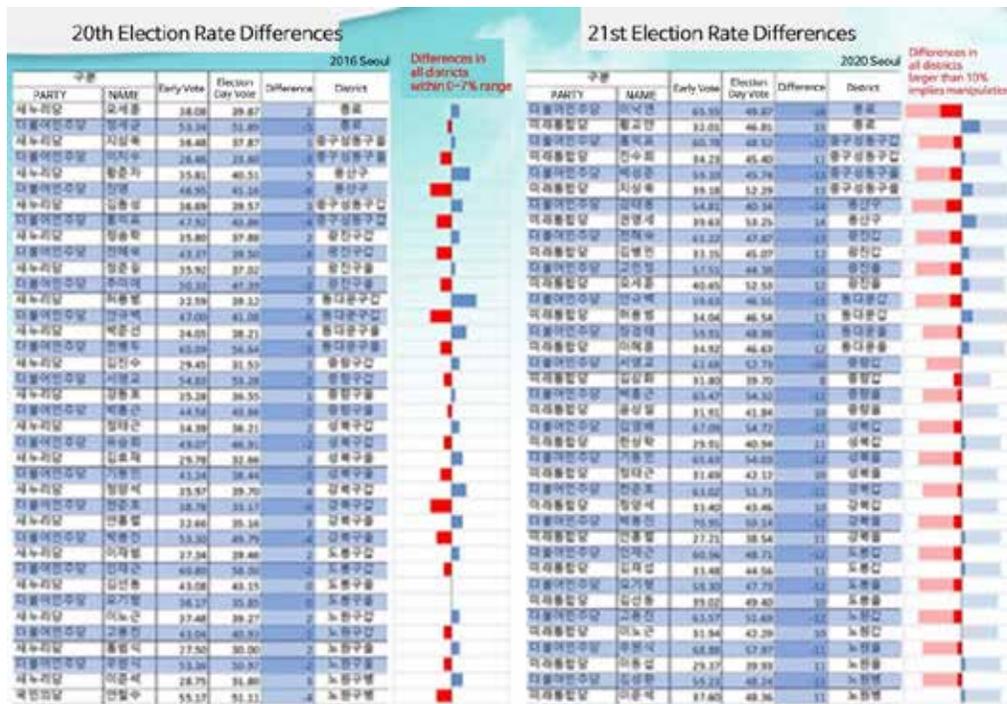
In the 21st legislative election, such an occurrence emerged overall in the capital and regions like Daejeon where the competition between the United Future Party (UFP) and Democratic Party of Korea (DPK) candidates were fierce.

In the case of the Jongno-gu district, candidate Lee, Nak-yeon of DPK, who received 65.55% of the early votes, received 49.87% of the election day votes. On the other hand, candidate Hwang, Kyo-an received 32.01% of early votes and 46.81% of the election day votes. In the Kwangjin district, candidate Oh, Sehoon received 40.65% of early votes and 52.53% of the election day votes; and candidate Koh, Minjung received 57.51% of early votes and 44.38% of the election day votes. In Seong-dong of the Junggu district, candidate Ji, Sang-wook received 39.18% of early votes and 52.29% of the election day votes.



(Excerpt from Exhibit No. 4 The results of Jongno-gu votes of 21st general election and from Exhibit No. 5 The results of Jongno-gu votes of 20th general election)

As confirmed in the graph above, the early vote percentage and the election day vote percentage were similar or there was not much difference in the 20th general election. However, in the 21st general election, the early vote percentage and the election day vote percentage were not similar from any polling station.



The table above shows the difference between the early votes rate and the election day votes rate for each candidate for the 20th and the 21 legislative elections in each district of Seoul.

The difference in the 20th general election ranges between 0 to 7%, while in the 21st general election, the difference is almost always more than 10%, an occurrence that defies common sense. In almost all other districts where the United Future Party competed with Democratic Party of Korea, similar patterns emerged.

As mentioned before, the United Future Party candidates had an issue of removing a candidate from the party in the media the day before the election, which was a disadvantage for their election day votes. On the other hand, the Democratic Party of Korea candidates had no unfavorable factors to make their election day votes much more advantageous. Yet, when this kind of result happened, it is clearly against the rule of experience.

12. The top statistics professor in Korea confirmed that such a result cannot happen statistically.

Park, Sung-hyeon, a former president of the Korean Statistical Society and former president of the Korean Academy of Science and Technology, and now professor emeritus of Seoul National University's Department of Statistics, who established the foundation of statistics in Korea, stated in an interview with a newspaper that such a discrepancy between the early votes and the election day votes cannot be explained without an artificial intervention.

-- This is a very sensitive matter. You could lose the authority and reputation you have accumulated so far as a statistician.

"I cannot say they are definitely evidence of manipulation, but **from a statistician's perspective, it is very strange.** One may argue it happened by chance, but statistically such a coincidence is very difficult to happen. Let me put it this way: **'Unless God really was determined to make it so in advance, this cannot happen.'**"

-- Even though it is not statistically understandable, it can happen in reality. Reality does not always follow the statistical theory. Doesn't the results of this election in fact tell us so?

"Statistics is the reflection of reality. **For example, Seoul has the regional characteristics between the north and south of the Han River, and each candidate's competitiveness is different, so it's normal that the support they receive is varied. Yet, in 49 polling stations in Seoul, the early voting rate of the Democratic Party of Korea was higher than the election day voting rate by an average of 12%. Also, the standard deviation among the 49 districts is 2.4%, which shows a similar pattern.**"

(Excerpt from Exhibit No. 6 May 4, 2020 Chosun Ilbo news article "Early voting result not understood statistically ... NEC has responsibility to clear suspicions")

13. Professor Walter Mebane, an international authority in fraudulent election research, said that the 21st general election is a "fraud" and the fraud lies heavily in the area of the early votes.

Professor Walter Mebane, one of the top authorities internationally in fraudulent election research, published a paper titled "Frauds in the Korea 2020 Parliamentary Election" on April 29, 2020 (U.S. time) about the results of the 21st general election. In the paper, he confirmed that fraud was committed overall in the 21st general election and the fraud happened heavily in the early votes.

Figure 4 uses plots by subset of Democratic party focused observations to illustrate which observations are fraudulent according to the eforensics model with the Democratic party focused specification. Nonfraudulent observations are plotted in blue and fraudulent observations appear in red. The frequencies of fraudulent and not fraudulent units appear in the note at the bottom of the figure. Visually and by the numbers, frauds occur most frequently for pre-vote units (43.1% are fraudulent), next most frequently for for district-level, election-day, not abroad units (3.14% fraudulent) then next most frequently postal election day units (.925% are fraudulent). None of the abroad units are fraudulent.

Figure 5 uses plots by subset of constituency-leader focused observations to illustrate which observations are fraudulent according to the `eforensics` model with the constituency-leader focused specification. Nonfraudulent observations are plotted in blue and fraudulent observations appear in red. The frequencies of fraudulent and not fraudulent units appear in the note at the bottom of the figure. Visually and by the numbers, frauds occur most frequently for pre-vote units (22.6% are fraudulent), next most frequently for postal election day units (2.09% are fraudulent) then next most frequently for district-level, election-day, not abroad units (.920% fraudulent). None of the abroad units are fraudulent.

party. Both posterior means and 95% and 99.5% credible intervals are reported. The results show that for the Democratic Party focused specification over all about 1,491,548 votes are fraudulent, and of the fraudulent votes about 1,122,169 are manufactured (the remaining 369,379 are stolen—counted for the leading party when they should have been counted for a different party). Overall, according to the `eforensics` model, about 10.43% of the votes for the Democratic Party candidates are fraudulent. The results show that for the constituency-leading focused specification over all about 1,171,734 votes are fraudulent, and of the fraudulent votes about 910,444 are manufactured (the remaining 261,290 are stolen—counted for the leading party when they should have been counted for a different party). Overall, according to the `eforensics` model, about 7.26% of the votes for the constituency-leading candidates are fraudulent.

(Excerpts from Exhibit No. 7-1 "Frauds in the Korea 2020 Legislative election" by Walter Mebane, and Exhibit No. 7-2 The Korean translation of "Frauds in the Korea 2020 Legislative election" by Walter Mebane)

14. Subconclusion

As a result, even though the plaintiff gained more election day votes than early votes in the 21st

general election, due to the totally opposite pattern of the early voting results, which even the academic world calls the early votes either impossible without some external intervention or "fraud", the plaintiff's fortune changed. It was the same result for other United Future Party candidates.

As was mentioned before, the deviation **is significantly beyond the margin of error and by the fact that the differences in the early votes and election day votes between the leading candidates was at least by 23.4% means it could have a profound effect on the election results.**

In relation to this, we will make additional verification through recounts of the votes and such, but this is a very extraordinary situation where everything related to the early voting process should be closely examined and analyzed, like the QR code, early voting ballot program, from the verification of the related computer system to the manual counting of the ballots.

15. In the 21st general election, there were illegality and fraud in not just the election procedure, but also in the counting process, so the results cannot be reliable.

16. The overall procedure of the 21st general election, including problems in moving of the early voting ballot boxes and inadequate management of the early voting ballots, cannot be trusted and this aspect has affected the election results.

The inadequate management of the early voting ballot boxes has been criticized for a long time, yet all levels of elections commission including the NEC did not correct the problem. As a result, owing to the development of social media such as YouTube, the inadequate management of the early voting ballots in the 21st general election was clearly revealed. Especially, the Outside Jurisdiction early voting ballots were placed into a yellow plastic bin and transferred without any monitoring of security personnel. (See picture below.)





Especially in case of the Outside Jurisdiction early voting ballot boxes, there were management blind spots from transferring to storage. **The fact that Outside Jurisdiction ballots were recently found to be stored in fitness clubs without any security measures** makes the results totally untrustworthy.



(Shows Outside Jurisdiction ballots stored in a fitness club and being taken away for counting)

17. Also, the concerns for invasion of privacy due to the use of QR code was already raised by both the U.S. and members of the Security Council, and election fraud using QR code has been already committed in Congo.

The former U.S. ambassador to the United Nations, Nikki Haley, had forewarned that the election results could be tainted by using the QR code in the electronic voting machine that was manufactured by Korea-based Miru Systems, whose electronic voting machine was used in the Congo's presidential election.

The plan to use an electronic voting machine manufactured by a Korean company in the Democratic Republic of Congo's year-end presidential election has raised controversy in the UN Security Council. The U.S. has even demanded the cancellation of use.

U.S. and members of the Security Council expresses concerns: "Can be manipulated, as privacy is not guaranteed"

(Excerpt from Exhibit No. 8 March 4, 2018 Joongang Sunday article "Electronic voting machine exported from Korea may pose great danger to Democratic Republic of Congo")

Besides former U.S. ambassador Nikki Hayley, Joseph Lorenzo Hall, an election technology expert, also stated that since QR codes can hold a variety of information, the Congo election using this should not be proceeded with using this.

A report issued in May by the Consortium for Elections and Political Process Strengthening stated that Congolese voters would insert a paper ballot in an electronic voting machine, choose a candidate on a touch screen, and the machine would then print the paper ballot to be inserted in a ballot box. However, Hall said the ballots that Congo intends to use feature unique QR codes that could jeopardize ballot secrecy. He identified other potential vulnerabilities in the machines such as wireless connectivity, unprotected USB ports and an outdated operating system.

(Excerpt from Exhibit No. 9 September 10, 2018 The Washington Post article The Cybersecurity 202: The U.S. is warning Congo that using electronic voting machines could backfire)

The Congolese citizens protested against the use of the electronic voting machine, but the Congolese government decided to use the machine made by Miru Systems as planned, and the election results became tainted.

As will be described later about QR codes, it violates the current law and despite the fact that the possibility of manipulation cannot be ruled out, it enforced violating the current law by the use of QR codes in early voting. As it was mentioned above, a statistically impossible early voting result came out, there would be also a significantly tainted result in the ballot counts.

18. Misclassification of votes due to the use of electronic ballot counting machines and the possibility of manipulation cannot be excluded, misclassification of votes due to the use of electronic ballot counting machines has already happened repeatedly.

Misclassification of votes means a vote for a candidate being counted as a vote for another candidate, which can be simply called as "vote mixing."

The National Election Commission provided ballot sorters to assist in democratic elections in developing countries, and thus in regard to the electronic ballot counting machines, there were misclassified votes up to 12 times as normal on both camps in Iraq's general election that caused the cancellation of ballot counting. And an obvious misclassification of votes happened during this April 15th general election.

The issue of misclassified votes is not just controversial to the 21st general election, but in the past, the Democratic Party of Korea and its supporters strongly argued for the abolishment of electronic ballot counting machines and for the possibility of manipulation, and there were actual data that verified misclassification of votes through an examination. Thus, the 21st general election in the Yeonsu-gu district was conducted without resolving the long-standing issue of misclassified votes, which also cannot escape the same problems, the same suspicion.

Misclassified Ballots Status Table

- ◆ Election District:
- ◆ Total No. of Ballots:

No.	District	Misclassification	Misclassification location
1	상동 제5선거구	간짜 무효권 2권 / 1권만	10 무효권 3번째
2	부계동 4선거구	야당 무효권 1권 / 1권만	32 무효권 1번째 (명목 순서대로)
3	상동 제5선거구	간짜 무효권 2권 / 1권만	10 무효권 5번째
4	상동 제5선거구	1 No Moo-hyun ballot in Lee Hoi-chang ballot bundle	In the 2nd bundle out of 100 bundles
5	상동 제5선거구	1 No Moo-hyun ballot in Lee Hoi-chang ballot bundle	In the 68th bundle out of 100 bundles
6	"	야당 무효권 1권 / 1권만	" 69번째
7	"	야당 무효권 1권 / 1권만	" 60번째
8	상동 제5선거구	야당 무효권 1권 / 1권만	100 무효권 65번째

(Excerpt from Exhibit No. 10 Misclassified votes of the 16th presidential election, where candidate Lee, Hoi-chang of the Grand National Party demanded recount of the ballots that resulted in a table that summarized the occurrences of misclassified votes)

The National Election Commission as well as all levels of the commission are arguing that the ballot sorter is not an electronic voting machine but simply an aid to ballot counts and its accuracy has been already proved through a verification led by the Supreme Court from past election suits. Yet, there has never been a proof that resolves the issue of misclassified votes.



(Captured from May 3, 2020 JTBC News where an election official is not checking the ballots individually but cursorily in a rush)

19. In foreign countries with a long history of elections, when there is a procedural violation the election results are voided, and there is a ruling that use of an electronic device in the

ballot counts is in violation of the constitution.

20. Austria

In the case of Austria, in the 1st round of the presidential election held on April 24, 2016, candidate Hofer placed 1st with 36% of the votes and candidate Van der Bellen placed 2nd with votes at around 20%.

In the run-off held at around May 22, 2016, **candidate Hofer who was in the lead in the beginning lost to candidate Van der Bellen as the early votes (mail-in votes) of almost 700,000 ballots were counted,** where the difference was **30,863 votes.**

However, when it was found out that the early votes were opened without observers, Austria's Ministry of Home Affairs investigated the matter and reported that **as much as 23,000 votes could have been affected** by the premature opening of the early votes and that 2,000 votes made by youths under the legal age of voting, a serious violation, was excluded from the count.

In response, **Gerhart Holzinger, the chief justice of the Austrian Constitutional Court** ruled that "the illegitimacy of more than 700,000 votes constitutes a reasonable cause for a recall," to vacate the elected candidate, **seeing that the illegitimacy was not only in the 23,000 prematurely opened early votes but fraud was committed in the entire early voting process.** (Exhibit No. 11 July 1, 2016 Yonhap News article "Austria holding presidential election again...Constitutional court vacates election results for foul play in absentee votes")

The chief justice of the Austrian Constitutional Court announced that influenced by the Ministry of Home Affairs' release on violation of premature opening of the early votes, **annulled the presidential election results based on the fairness issue of the overall early votes, when candidate Hofer would not win even if all 23,000 votes went to him.**

21. Germany

The 2009 precedent by Germany's Federal Constitutional Court addresses all parts of an election that can be manipulated through hacking by using computers (electronic machine).

In accordance **Germany banned even the use of counting machines that counts the ballots and ruled that voting machines can be used only when general citizens can clearly confirm, even without any special technological knowledge, their use involves no defect or possibility of manipulation.**

In March 2009, Germany's Federal Constitutional Court ruled that the electronic votes of the 16th German Federal Legislative Election of 2005 were unconstitutional. The bases of the ruling were that electronic votes are against public nature of elections and that **it would be difficult for a general constituent to know of the software's defect or an intentional manipulation using it.**

At the time the Constitutional Court emphasized the point that general

constituents should be able to verify how their votes would be processed. This is an argument that electronic voting shall be allowed only when even a constituent without special expert knowledge can verify how their vote is processed. Also, the Constitutional Court pointed out the fact that specific procedures and method of publicly checking whether there was manipulation of electronic votes is not yet legislated and that electronic voting has to be complete and flawless, as it is vulnerable of errors and risk of manipulation.

(Excerpted from Exhibit No. 12 October 8, 2019 Sky Daily news article "Only Election commission knows the essential info of controversial and problem-fraught early votes.")

22. The results of the 21st general election has reached a point where they cannot be trusted due to the aforementioned use of QR code which can change the election results at will, misclassified votes due to electronic ballot counting machines, and violation of the secret ballots. Now is the time to correct them.

The principle of the secret ballot is one of the very fundamental election principles and aligns with the freedom of conscience secured by the constitution.

Article 278, Clause 2 of the Public Official Election Act clearly stipulates that the secret ballot principle should be maintained in voting and ballot counting done by a computer network.

In addition, the Public Official Election Act also stipulates in the same article's clauses 2 and 3 that to ensure the accuracy of the vote, the ballot count per candidate should be accurate and the election results should be verifiable.

Article 278 of the Public Official Election Act (voting and counting done by a computer network)

② The computerization of the vote management should ensure the secrecy of the voting, voting made easy for constituents, ensure the observation of the parties or candidates, and should make correction of errors, exclusion of invalid votes and accuracy of other votes be made possible.

③ The computerization of the ballot count management should accurately tabulate the votes by party or candidate, the ballot count should be verifiable, and ensure the observation of the parties or candidates.

In regard to the early voting ballot issuing system currently our country adopted, there is an argument that it has a higher possibility of secret ballot fraud than the electronic voting machine that was proven in the past to have a high possibility of manipulation. It especially pointed out as a problem that the National Election Commission obtained a perfunctory certification through a self-formed committee rather than a certification from a professional agency for the related software's source code in the process of introducing the early voting ballot issuing system and applying it to the election process.

According to a NEC press release in May 2014, they made the ballot sorter's source code public to the security advisory committee established by the NEC and had its software officially certified by the Korean Information Technology Association, but not verified by independent experts. However, **as for the early voting ballot issuing system, its source code was not made public and its software was not officially certified by the Korean Information Technology Association.**

Some are voicing suspicion regarding intentionality, but the NEC is not providing a convincing explanation. In May 2018, through a press release, the NEC emphasized that with the local elections soon approaching, that they are establishing integrity and security of its devices and system. However, there was no mention of the early voting ballot issuing system's source code being certified even by its own security advisory committee.

(Excerpt from Exhibit No. 12 October 8, 2019 Sky Daily news article "Only Election commission knows the essential info of controversial and problem-fraught early votes.")

However, in the 21st general election, despite numerous criticism like stated above, the NEC and the different levels of the election commission have deliberately violated the secret ballot principle, the principle to verify voting results, etc. by for instance, not making public the early vote procedures even to its own security advisory committee. This kind of deliberate election intervention should not be repeated.

Thus, except for the election day votes of each candidates, the rest including early votes and the proportional representation voting should be ruled invalid as they cannot be verified.

23. Sub-conclusion

For the reasons as stated above, **there needs to be recount of ballots and electronic verification of the mechanical devices and related system of the electronic ballot counters used in the 21st general election in the Yeonsu-gu district. If a comprehensive verification does not happen, all kinds of suspicions related to the introduction of the electronic ballot counting machine will linger.**

As the NEC mentioned in 2012 that "although some say that errors made by electronic ballot counting cannot be undone, our election law states that it has a device that can correct errors," and also said, "Our election law has an election litigation procedure that, if one has an objection about the election results, one can contest the result of the election even after the election. Especially, **as the ballots themselves and the image files of the ballots are sealed and preserved, verification of ballots are always possible,**" if there is an objection regarding the electronic ballot counting machine, we can say that the NEC's position also actively approves of ballot recounts through election lawsuits.

[7] Although some claims that if mistakes are made with the count it's irreversible, our election law has a device that can correct errors.

o Our election law has an election litigation procedure that, if one has an objection about the election results, one can contest the result of the election even after the election.

o Especially, **as the ballots themselves and the image files of the ballots are sealed and preserved, verification of ballots are always possible.**

(Excerpt from Exhibit No. 13 "About the Ballot Classifier," p. 10 from the National Election Commission publication)

Accordingly, **we highly request that all the votes including the early votes and the election day votes of the Yeonsu-gu district be manually recounted, and there be an examination as to whether there was external intervention involved in the electronic ballot counting machine and related system.** If this kind of examination is not conducted, the result of the 21st general election should be deemed invalid.

24. Use of QR code, not a bar code, on the early voting ballots is against the law.

25. The use of QR code is a clear violation of the Public Official Election Act.

In August 2018, the National Assembly's Public Administration and Safety Committee stated in its report on 'The Approval of CEC's 2017 Fiscal Year Balance of Accounts and Reserve Fund Disbursement' that "the NEC has printed QR codes and not bar codes on the early voting ballots to enclose information such as the name of the election," and interpreted that **"This is an aspect that is contradictory to the definition of bar code that the Public Official Election Act stipulates."**

The above-mentioned opinion of the 2018 Public Administration and Safety Committee is the first official concession that the legislative branch, the National Assembly, has made regarding the so-far controversial "QR code use on the early vote ballots" that has been pointed out as the epicenter of violation of secret ballot principle and the current law. Yet, all level of election commissions including the NEC has used the QR code on the early voting ballots in the 21st general election.

The NEC used QR codes on the early voting ballots instead of bar codes in the upcoming general election. However, Article 151, clause 6 of the election law stipulates that "The serial number printed on the ballots should be in the form of a bar code (a pattern in the form of bars that a computer can recognize), and the bar code can contain the names of the election, election district and the Election commission in

charge." In the background of the controversy regarding the use of the QR codes is the fact that **someone pointed out that a person's political inclination information as to which candidate and party the voter voted for could be leaked through the QR code.**

Even the 2018 National Assembly raised an objection saying "It does not agree with the current law."

Prior to this, even the Congress raised an issue as to the problem related to QR code. "The preliminary review on CEC's 2017 Fiscal Year Balance of Accounts" published by the Public Administration and Security Council of the 2018 National Assembly criticized that "Even though Article 151 of the current Public Official Election Act stipulates that ballots' serial numbers should be expressed as a bar-formed symbol, the NEC printed QR codes." The same report also pointed out that "This has an aspect that is contradictory to the current law."

(Excerpt from Exhibit No. 14 April 13, 2020 New Daily article "Election commission insists on QR code when election law stipulated bar code should be on ballots")

This issue along with the electronic ballot counting machine is directly connected to electronic problem that is introduced in the election procedure, and in the context that this violates the plaintiff's right to hold public office (Article 25 of the Constitution), the people's right to vote (Article 24 of the Constitution), and also the secret ballot principle (Article 41 of the Constitution) if the QR code contains individuals' vote results while one cannot tell how much voter identification information is included in the code and there is no way to verify the information.

26. Although the information that can be contained in the QR code is broad, according to the election document, it's been revealed that the National Election Commission obtained information beyond what was regulated, thus this constitutes a clear violation of the law.

According to Article 151, Clause 6 of the Public Official Election Act, 'the serial number printed on the early voting ballot should be in the form of a bar code (in the form of bars that can be read by a computer), and in the **bar code can contain the name of the election, name of the electoral district, and the related election commission**' which **limits the information contained in the barcode and if the QR code contains information other than 'the name of the election, name of the electoral district, and the related election commission', this clearly violates the aforementioned Article 151, Clause 6 of the Public Official Election Act.**

In the picture below, according to the QR code printed on the early voting ballots of the 2017 presidential election and the finding, at the end of the serial number instead of numbers, alphabets were included which is irregular and "the alphabets could possibly be 'encrypted' and must have some nefarious purpose if they are persistent on using the QR code" which citizen groups continue to raise issues with.



(Excerpt from Exhibit No. 15 September 5, 2018 Sky Daily article "National Assembly officially concedes on QR code on ballots violates current law")

However, the National Election Commission explained that, "The serial numbers have simply been expressed in alphanumeric form and these are not encryptions," and as stated before, they have never attempted to make any verifications. Also, according to the "2020 Election Information System's Integrated Consigned Management Project Request for Proposal," the operating systems that are directly linked to the early voting ballots, 'such as the election management system and the integrated registration system,' have massively amassed personal information (refer to the table below) but the citizens does not know what information was included in the QR code since it did not go through a special technological verification process, thus makes this a violation of Article 151, Clause 6 of the Public Official Election Act.

System Name	Personal Information File Contents	Reason for Implementation
Election Management System	<ul style="list-style-type: none"> ◦ Collected Information: name, resident registration number, address, phone number, email address, record of divorce, prior conviction, military service status, education, tax payment, teaching experience, assets ◦ Estimated Number of Personal Information: approximately 5 million people 	<ul style="list-style-type: none"> ◦ Processed more than 1 million personal information ◦ Processed more than 50,000 unique identifying information
Integrated Registration System	<ul style="list-style-type: none"> ◦ Collected Information: name, birth date, gender, last 3 digits of resident registration number, personal stamp or signature, address ◦ Estimated Number of Personal Information: approximately 420 million people (nation-wide) 	<ul style="list-style-type: none"> ◦ Processed more than 1 million personal information ◦ Processed more than 50,000 unique identifying information

System Name	Personal Information File Contents	Reason for Implementation
Overseas Voters Management System (including Permanent Registration System)	<ul style="list-style-type: none"> ◦ Collected Information: name, resident registration number, passport number, phone number, email address, record of divorce, last-known address, overseas address, reason for vote ineligibility ◦ Estimated Number of Personal Information: approximately 500,000 people 	<ul style="list-style-type: none"> ◦ Processed more than 50,000 unique identifying information
Overseas Voters Internet Report/Request System (including Overseas List access service)	<ul style="list-style-type: none"> ◦ Collected Information: name, resident registration number, passport number, phone number, email address, record of divorce, last-known address, overseas address, reason for vote ineligibility ◦ Estimated Number of Personal Information: approximately 500,000 people 	<ul style="list-style-type: none"> ◦ Processed more than 50,000 unique identifying information
Online Voting System	<ul style="list-style-type: none"> ◦ Collected Information: administrator name, department, contact number, email address, position, voter name, department, email address, birth date, mobile phone number, etc. 	<ul style="list-style-type: none"> ◦ Preparing for the expansion of accumulated personal information processing in the future

(Excerpt from Exhibit No. 16 "2020 Election Information System's Integrated Consigned Management Project Request for Proposal", p.9)

27. Sub-conclusion

The early voting results that changed the 21st general election's results in the Yeonsu-gu district and other districts across the nation are statistically untrustworthy as explained above.

In addition, like stated above QR codes were imbedded in early voting, and despite being criticized by the National Assembly that QR codes are violating the current laws, the NEC and all levels of the commission are enforcing the use of QR codes and the NEC should be handling a fair election, but they have destroyed the fairness of an election as well as the principle of secret ballots, so these violations are significant which should invalidate not just the 21st general election results from the Yeonsu-gu district but from all districts nationwide.

28. The early voting ballots used ballot papers and QR codes that differs from what is regulated from the Public Official Election Act

The defendant which includes the NEC has used QR codes. The Public Official Election Act specifies that bar codes are to be used, but this general election committed an illegal act by using QR codes, not bar codes, on the early voting ballots.

Public Official Election Act

Article 146, Clause 3: When it comes to voting, there should be no identifying markers that will assume the identity of the voter.

Article 151, Clause 6: ‘Despite Clauses 1 and 5, Election Commissions of the region, city and county, ballots issued at early voting stations should be prepared by early voting officials using the ballot issuing machine. In this case, the serial number being printed on the ballot should be in the form of a bar code (marking in the shape of a rod which can be read by a computer), and in the bar code, the name of the election, name of the electoral district and the managing election commission can be included.’

Article 179, Clause 1, Point 1: ‘failure to use regular ballot papers’

In the early voting of this general election, the Public Official Election Act was violated as described above by using QR codes on the ballots, **which is a cause to invalidate the election because they failed to use regular ballot papers.**



(Left: bar code, right: QR code)

Also, as clarified above, in the QR code printed on the early voting ballots of this election, there were information that would not be contained in a bar code—a serial number that can contain personal information, such as prior conviction, army service, tax payment, email address, educational background information, asset information, which is not only a violation of Public Official Election Act Article 146, Clause 3 but also a violation of the secret ballot principle, which is a serious violation of the constitution.

29. Conclusion

Reasons as stated such above, the results of the 21st general election was tainted by the

negligence or intentional acts of the defendant. The election procedure cannot be trusted either, as the QR code was used in early voting, electronic ballot counting machines, electronic counting machines, etc., which constitutes violations of the Public Official Election Act. Such aspects were pointed out by a statistician, the world's foremost authority in fraudulent election and such use of the QR codes was a violation of the principle of the secret ballot, which is one of the 4 principles. In consideration of all these, there is sufficient reasons to invalidate the results of the 21st general election.

The fact that the results of the 21st general election were compromised by external intervention would be proven if verified by a recount, but it must be emphasized once more that the recount should proceed only with the premises that the integrity of the electronic forensic should be established first and the ballots to be the same as the original ballots through QR code comparison.

Regarding the results of the 21st general election, there has been endless complaints about multiple statistically incomprehensible occurrences, expert opinions that it was a fraudulent election, and endless discontent expressed by the people. Although it's not been proven accurate, these issues must be addressed and improved through this lawsuit as there are those who have willfully approached the election process with the intent of manipulation. These mistakes and bad practices that should not be allowed must be judged and pulled out from its root by the Supreme Court in order to obtain its root of establishment of the democratic electoral system for the future.

Methods of Proof

1. Exhibit No. 1 The 21st general election results from Yeonsu-gu district in Incheon
2. Exhibit No. 2 The 20th general election results from Yeonsu-gu district in Incheon
3. Exhibit No. 3 The list of candidates' Inside and Outside Jurisdiction rates are 99% or more identical in the 21st general election
4. Exhibit No. 4 The results of Jongno-gu votes of 21st general election
5. Exhibit No. 5 The results of Jongno-gu votes of 20th general election
6. Exhibit No. 6 May 4, 2020 Chosun Ilbo news article "Early voting result not understood statistically ... NEC has responsibility to clear suspicions"
7. Exhibit No. 7-1 "Frauds in the Korea 2020 Legislative election" by Walter Mebane
8. Exhibit No. 7-2 The Korean translation of "Frauds in the Korea 2020 Legislative election" by Walter Mebane
9. Exhibit No. 8 March 4, 2018 Joongang Sunday article "Electronic voting machine exported from Korea may pose great danger to Democratic Republic of Congo"
10. Exhibit No. 9 September 10, 2018 The Cybersecurity 202: The U.S. is warning Congo that using electronic voting machines could backfire
11. Exhibit No. 10 Misclassified votes of the 16th presidential election, where candidate Lee, Hoi-chang of the Grand National Party demanded recount of the ballots that resulted in a table that summarized the occurrences of misclassified votes
12. Exhibit No. 11 July 1, 2016 Yonhap News article "Austria holding presidential election again...Constitutional court vacates election results for foul play in absentee votes"
13. Exhibit No. 12 October 8, 2019 Sky Daily news article "Only Election commission knows the essential info of controversial and problem-fraught early votes."
14. Exhibit No. 13 National Election Commission newsletter "About the Ballot Sorter"
15. Exhibit No. 14 April 13, 2020 New Daily article "Election commission insists on QR code when election law stipulated bar code should be on ballots"
16. Exhibit No. 15 September 5, 2018 Sky Daily article "National Assembly officially concedes on QR code on ballots violates current law"
17. Exhibit No. 16 "2020 Election Information System's Integrated Consigned Management Project Request for Proposal"

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