



February 10, 2020

Chair Troy Price  
Iowa Democratic Party  
5661 Fleur Drive  
Des Moines, IA 50321

Dear Chair Price,

As a declared candidate for the Democratic nomination for President who has complied with Sections III.B.1 and IX.E.2 of the Iowa Democratic Party Delegate Selection Plan (the "Plan"), and Pursuant to Sections I.A.8 and I.A.9 of the Plan, I write to request a limited precinct-level review and recanvass of the results of Iowa's precinct caucuses held on February 3, 2020.

Mathematical errors and inconsistencies in the tabulations for 25 precincts and three satellite caucuses led to at least 3.2312 too many state delegate equivalents (SDEs) to be assigned to Mayor Pete Buttigieg, and at least 2.3942 too few to my campaign.

These errors and inconsistencies are ripe for review because their correction would change the national delegate allocation by moving, at a minimum, one PLEO delegate from Mayor Buttigieg to my campaign. Specifically, there are currently four viable candidates statewide: Mayor Buttigieg, with 564.302 SDEs, myself, with 561.528 SDEs, Senator Elizabeth Warren, with 388.48 SDEs, and Vice President Joe Biden, with 339.678 SDEs. Because there are five PLEO delegates at stake, each viable candidate is awarded one PLEO delegate, and the fifth is awarded to the candidate with the most SDEs: currently, Mayor Buttigieg. After corrections, however, Mayor Buttigieg would fall at least to 561.071 SDEs,

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while my total would grow to at least 563.922 SDEs, and the fifth and final PLEO delegate would shift hands.

Attached to this letter as Exhibit A is a full list of the precincts for which we request a limited review and recanvass of the results, along with a brief explanation of the issue for each of them. Our request for a review and recanvass does not extend beyond these precincts.

If you have any questions about our request, or need additional information, please don't hesitate to contact my authorized representative:

Matt Berg

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Thank you for your time and attention to this urgent matter.

Sincerely,



Bernie Sanders

**Exhibit A: 25 Precincts and Three Satellite Caucuses  
with Mathematical Errors and Inconsistencies**

**1. Storm Lake 1 - Sanders down 1 delegate (.0785 SDE)**

In this 7-delegate precinct, according to IDP data, the raw delegate totals were 2.3333 for Sanders, 1.9744 for Buttigieg, and 1.2564 each for Warren and for Yang. Buttigieg's total was correctly rounded up to 2. However, Warren's 1.2564, which was tied with Yang, was incorrectly rounded up to 2, despite Sanders's 2.3333 being closer to 3. After rounding, the correct final allocation is 3 delegates for Sanders, 2 for Buttigieg, and 1 each for Warren and Yang.

**2. Norwalk Precinct 1 - Sanders down 1 delegate, Buttigieg over 1 delegate (0.2333 SDE)**

In this 8-delegate precinct, the raw delegate totals were: Buttigieg 1.9592; Biden 1.9184; Sanders 1.3469; Warren 1.2653; Klobuchar 1.2245. Initially, Buttigieg was awarded 2 delegates, Biden 2 delegates, Sanders 1 delegate, Warren 1 delegate, and Klobuchar 1 delegate. The final delegate was then awarded to Buttigieg. This is incorrect. After rounding, the correct final allocation is 2 delegates each for Buttigieg, Biden and Sanders, and 1 delegate each for Warren and Klobuchar.

**3. Ocheyedan (Osceola Co.) - Sanders down 1 delegate, Buttigieg over 1 delegate (.1 SDE)**

Each of the 3 candidates who reached viability in this 3-delegate precinct should have received 1 delegate. Before rounding, the raw delegate totals were Sanders and Klobuchar 0.6 each, and Buttigieg 1.8. However, Sanders was not awarded his only delegate, and Buttigieg's raw count was rounded up to 2. According to IDP rules, all viable candidates must be awarded a delegate, making the correct delegate allocation Sanders 1, Klobuchar 1, and Buttigieg 1.

**4. Bellair/Lincoln (Appanoose Co.) - Sanders down 1 delegate (.08 SDE)**

Each of the 4 candidates who reached viability in this 4-delegate precinct should have received 1 delegate. Before rounding, raw delegate totals were: Biden 1.8462; Buttigieg 0.9231; Sanders, Klobuchar 0.6154. However, Sanders was not awarded his only delegate, and Biden's raw count was rounded up to 2. According to IDP rules, all viable candidates must be awarded a delegate, making the correct delegate allocation Sanders 1, Klobuchar 1, Biden 1, Buttigieg 1.

**5. Guthrie Gold - Sanders down 1 delegate (.0857 SDE)**

In this 14-delegate precinct, according to IDP data, the raw delegate totals were: Biden, Klobuchar, and Buttigieg 2.9355; Sanders 2.4839; Warren 2.2581. Buttigieg was awarded 4 delegates. This is incorrect. After rounding, the correct final delegate allocation is: Biden, Klobuchar, Buttigieg, Sanders 3; Warren 2.

**6. Adair 04 SE - Sanders down 1 delegate (.0784 SDE)**

In this 10-delegate precinct, according to IDP data, the raw delegate totals were: Warren 2.5; Klobuchar 2.2222; Biden 1.9444; Sanders, Buttigieg 1.6667. In order to award all 10 delegates, the candidates with the largest remainder in their raw delegate count should have that count rounded up to the next whole number. Biden had the largest remainder (0.9444), followed by Sanders and Buttigieg (0.6667). According to information released by the IDP, Warren was allocated 3 delegates, while Buttigieg and Sanders used a coin flip to assign a remaining delegate, yielding 3 for Buttigieg and 1 for Sanders. After rounding, the correct final allocation is 2 delegates for each candidate.

**7. Des Moines 14 - Sanders down 1 county delegate (.2798 SDE)**

In this 6-delegate precinct, the raw delegate totals were: Buttigieg 1.9379; Sanders 1.8634; Warren 1.1553; and Biden 0.9317. Under IDP rules, the largest remainders should be rounded up to the next whole number first. However, according to the information listed by the IDP, Warren was awarded 2 delegates while Sanders was awarded 1. After rounding, the correct final delegate allocation is: Buttigieg 2; Biden 1; Sanders 2; Warren 1.

**8. North Liberty 6 - Sanders down 1 delegate (.405 SDE)**

In this 11-delegate precinct, the raw delegate totals were: Buttigieg 3.8709; Sanders 2.9797; and Warren 2.9241. Despite their different raw delegate totals, the caucus chair inexplicably decided to call Sanders and Warren a tie and held a coin flip, which landed in Warren's favor. In IDP rules, a tie is only when candidates have the same exact remainder in their raw delegate counts. Per those rules, this result was not a tie and the delegate should have been awarded to Sanders, who had a larger remainder in his raw delegate count. After rounding, the correct final delegate allocation is: Buttigieg 4; Sanders 4; Warren 3.



**9. Des Moines 80 - Sanders down 1 delegate, Buttigieg over 1 delegate (.2798 SDE)**

In this 10-delegate precinct, the raw delegate totals were: Sanders 4.6877; Buttigieg 3.0698; and Biden 2.2326. Under IDP rules, the largest remainders should be rounded up to the next whole number first. However, Buttigieg was rounded up to 4 delegates, and Sanders down to 4 delegates. This is incorrect. After rounding, the correct final delegate allocation is: Sanders 5, Buttigieg 3, Biden 2.

**10. Adams 2 - Buttigieg over 1 delegate (.0857 SDE)**

In this 7-delegate precinct, attendance was 21 caucus-goers, which makes the candidate viability cutoff 4 ( $21 \times .15 = 3.15$ , which rounds up to 4). Only 3 people caucused for Buttigieg, which means that he should not have received a delegate. Rather, that delegate should have gone to a coin flip winner between Biden and Sanders, each of whom had a raw delegate count of 1.3333 before rounding.

**11. Dickinson 5 - Buttigieg over 1 delegate (.125 SDE)**

In this 7-delegate precinct, the raw delegate totals were: Buttigieg 3.2034; Warren 2.3729; and Biden 1.3051. Under IDP rules, the largest remainders should be rounded up to the next whole number first. Here, the final distribution is currently listed: Warren 2; Buttigieg 4; Biden 1. This is incorrect. After rounding, the correct final delegate allocation is: Warren 4; Buttigieg 3; Biden 1.

**12. Dubuque 36 - Buttigieg over 1 delegate (.2667 SDE)**

In this 7-delegate precinct, the raw delegate totals were: Buttigieg 2.2207; Sanders 2.1724; Biden 1.4483; and Klobuchar 1.1103. Under IDP rules, the largest remainders should be rounded up to the next whole number first. Here, the final distribution is currently listed: Klobuchar 1; Sanders 2; Biden 1; Buttigieg 3. This is incorrect. After rounding, the correct final delegate allocation is: Klobuchar 1; Sanders 2; Biden 2; Buttigieg 2.

**13. Newton 4-2 - Buttigieg over 1 delegate (.115 SDE)**

In this 9-delegate precinct, the raw delegate totals for the candidates are: Buttigieg 2.7973; Sanders 2.5541; Warren 1.4595; and Yang 1.4595. Under IDP rules, the largest remainders should be rounded up to the next whole number first. Here, the final distribution is currently listed as Buttigieg 4 delegates, Sanders 3 delegates, Warren 1 delegate, Yang 1 delegate. This is incorrect. After rounding, the correct final delegate allocation is: Buttigieg 3, Sanders 3, Warren

1, Yang 1, with the final delegate determined by a coin toss between Warren and Yang, since those two candidates have raw delegate count remainders closest to .5.

**14. Richland/Coffins Grove (Delaware Co) - Buttigieg over 1 delegate (.15 SDE)**

In this 9-delegate precinct, the attendance was 36 caucus-goers, which makes the viability threshold 6, rounded up from 5.4. The final counts are: Klobuchar 9; Warren 9; Biden 12; Buttigieg 5. The IDP lists final delegate counts as: Klobuchar 2.25; Warren 2.25; Biden 3; Buttigieg 1. This is incorrect. Klobuchar and Warren should have each received one more delegate, yielding this final distribution: Klobuchar 3, Warren 3, Biden 3.

**15. Marion 8 - Buttigieg over 1 delegate (.4395 SDE)**

In this 6-delegate precinct, attendance was 164 caucus-goers, which makes the candidate viability cutoff 25, rounded up from 24.6. The final counts are: Biden 29; Buttigieg 24; Klobuchar 24; Sanders 47; Warren 40. Since Buttigieg and Klobuchar do not meet the viability threshold, these counts yield a final delegate distribution of: Sanders 2; Warren 2; Biden 2. The IDP lists a final delegate distribution of: Biden 1; Buttigieg 1; Klobuchar 1; Sanders 2; Warren 1. We ask that the IDP correct the delegate distribution in adherence to the candidate viability rules in the Delegate Selection Plan.

**16. Waterloo 2-4 - Buttigieg over 1 delegate (.202 SDE)**

In this 14-delegate precinct, 17 delegates were awarded, which is incorrect. The raw delegate totals were: Sanders 3.3871; Buttigieg 3.2742; Biden 2.8226; Klobuchar 2.2581; and Warren 2.1452. Under IDP rules, the largest remainders should be rounded up to the next whole number first. After rounding, the correct final delegate allocation is: Sanders 4, Buttigieg 3, Biden 3, Klobuchar 2, and Warren 2.

**17. Washington-Roselle (Carroll Co) - Buttigieg over 1 delegate (.11 SDE)**

In this 4-delegate precinct, raw delegate totals were: Buttigieg 2.3158 and Klobuchar 1.6842. Under IDP rules, the largest remainders should be rounded up to the next whole number first. Here, the final distribution is currently listed: Buttigieg 3 and Klobuchar 1. After rounding, the correct final delegate allocation is: Buttigieg 2 and Klobuchar 2.

**18. Dubuque 31 - Buttigieg over 1 delegate (.2667 SDE)**

In this 11-delegate precinct, 12 delegates were awarded, which is incorrect. The raw delegate totals for the candidates are: Buttigieg 3.3733; Biden 3.08; Warren 2.3956; and Klobuchar 1.8578. Under IDP rules, the largest remainders should be rounded up to the next whole number first. After rounding, the correct final delegate allocation is: Biden 3; Buttigieg 3; Warren 3; and Klobuchar 2.

**19. West Des Moines 212 - Sanders under 1 delegate, Buttigieg over 1 delegate (.2798 SDE)**

In this 11-delegate precinct, raw delegate totals were: Sanders 3.1657; Warren 2.1105; Buttigieg 1.8547; and Klobuchar 1.822. Rounding takes the delegates to Sanders 3, Warren 2, Buttigieg 2, and Klobuchar 2, leaving two delegates to allocate. IDP data lists the final distribution as Sanders 3; Warren 3; Buttigieg 3; Klobuchar 2. This is incorrect. Instead of Warren and Buttigieg receiving the extra delegate, Sanders and Warren should each receive another delegate because their decimals are closest to .5. That leads to the correct final delegate allocation: Sanders 4, Warren 3, Buttigieg 2, and Klobuchar 2.

**20. Newton Forest (Winnebago Co) - Buttigieg over 1 delegate (.15 SDE)**

Each of the 3 candidates who reached viability in this 3-delegate precinct should have received 1 delegate. Before rounding, raw delegate totals were: Buttigieg 1.5; Sanders 0.75; and Klobuchar 0.75. However, Klobuchar was not awarded her only delegate, and Buttigieg's raw count was rounded up to 2. According to IDP rules, all viable candidates must be awarded a delegate, making the correct delegate allocation Buttigieg 1, Sanders 1, and Klobuchar 1.

**21. Iowa Falls 2 - Buttigieg over 1 delegate (.072 SDE)**

In this 22-delegate precinct with 110 attendees, The final counts were Klobuchar 27, Sanders 21, Warren 22, and Buttigieg 39. The raw delegate totals for the candidates are Klobuchar 5.4000, Sanders 4.2000, Warren 4.4000, and Buttigieg 7.8000. Initially, Klobuchar was awarded 5 delegates, Sanders 4 delegates, Warren 4 delegates, and Buttigieg 8 delegates. The final delegate was then awarded to Buttigieg. This is incorrect. After rounding, the correct allocation of the final delegate should have been determined by a coin flip between Klobuchar and Warren as Buttigieg, having a remainder of .8000 was already rounded up from the raw delegate total.

**22. Hoover Elementary School (CD1 satellite caucus) – reduced SDE allocation to a satellite caucus**

Official IDP data apportions 1.5 SDE to this satellite caucus, based on total attendance of 112. This is incorrect. The total attendance was instead 121. Some caucusgoers spoiled their Preference Cards during realignment but that should not have impacted the total attendance. Correcting this error leads to an increased SDE apportionment of .08 to this satellite caucus.

**23. Mayflower Retirement Community (CD1 satellite caucus) – increased SDE weight to a satellite caucus**

According to IDP data, the sum of all first counts is 69 and the sum of all final counts is 71. This cannot be correct, since only 65 people pre-registered for this satellite caucus. This satellite caucus currently receives .9508 SDE's based on the incorrect size of 71. This apportionment should change to reflect the number of Presidential Preference Cards that were distributed to caucusgoers who appeared on the pre-registration list.

**24. Ottumwa 8 - Buttigieg over 1 delegate (.09 SDE)**

In this 13-delegate precinct, the raw delegate totals were Sanders 4.8750, Warren 4.0625, and Buttigieg 2.84375. This rounds to Sanders 5 delegates, Warren 4 delegates and Buttigieg 3 delegates. The final delegate was then awarded to Buttigieg, for a delegate allocation of Sanders 5, Warren 4, Buttigieg 4. This is incorrect. The delegate should instead have gone to Warren, since her decimal is closest to .5, leading to the correct final delegate allocation of Sanders 5, Warren 5, Buttigieg 3.

**25. George Mason University - Sanders down 1 delegate (.0126 SDE)**

According to IDP data, attendance at this satellite caucus was 15 people, making the viability threshold 3, rounded up from 2.25. IDP data has final counts of Klobuchar 2, Sanders 5, Warren 8, and delegate totals of Klobuchar 1 delegate, Sanders 1 delegate, and Warren 2 delegates. This is incorrect. Since Klobuchar was not viable, she should not receive a delegate. Removing Klobuchar, the raw delegate totals are Sanders 1.3333, Warren 2.1333. Sanders rounds to 1 delegate, Warren to 2, but that leaves 1 delegate remaining to allocate. Since Sanders' decimal is closest to .5, that delegate should be allocated to him, leading to the correct final delegate allocation of Sanders 2 delegates, Warren 2 delegates.

**26. Des Moines 71 - Sanders down 1 delegate (.2798 SDE)**

In this 10-delegate precinct, attendance was 187, making the viability threshold 29, rounded up from 28.05. In IDP data, the final counts were Biden 42, Buttigieg 47, Sanders 62, Warren 28, with delegate counts of Biden 2, Buttigieg 3, Sanders 3, Warren 2. This is incorrect. Since Warren was not viable, she should not have received any delegates. Removing Warren, the raw delegate totals were Sanders 3.3155, Biden 2.2460, and Buttigieg 2.5133, rounding to Sanders 3 delegates, Biden 2 delegates, and Buttigieg 3 delegates. That leaves 2 delegates left to allocate, which should have gone to Sanders and Biden since their decimals are closest to .5, leading to the correct final delegate allocation of Sanders 4 delegates, Biden 3 delegates, Buttigieg 3 delegates.

**27. Bloomfield Ward 3 - Buttigieg over 2 delegates (.06 SDE)**

In this 12-delegate precinct, according to IDP data, the final counts were Biden 5, Buttigieg 3 Klobuchar 5, Sanders 6, Warren 1, and Yang 1, which adds up to 21 caucus-goers. With attendance of 21, the viability threshold is 4, rounded up from 3.15. IDP delegate totals are Biden 3 delegates, Klobuchar 3 delegates, Sanders 4 delegates, and Buttigieg 2 delegates. This is incorrect. Buttigieg should not have received any delegates because he was not viable. Removing Buttigieg, raw delegate totals were Klobuchar 2.8571, Sanders 3.4286, and Biden 2.8571. Klobuchar would round to 3 delegates, Sanders to 3 delegates, and Biden to 3 delegates, but that leaves 3 delegates left to allocate. Klobuchar, Sanders, and Biden should all be rounded up again to 4 delegates each.

**28. West Union Ward 2 (Fayette Co)- Buttigieg over 1 delegate (.12 SDE)**

In this 3-delegate precinct, official IDP results put attendance at 19, making the viability threshold 4, rounded up from 3.1667. According to IDP data, the final counts were: Buttigieg 10, Sanders 5, Biden 4, with delegate counts of Buttigieg 2, Sanders 1, Biden 0. This is incorrect. Since IDP rules state that a viable candidate must receive at least one delegate, the final correct delegate distribution is: Buttigieg 1, Sanders 1, Biden 1.