IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

DONNA CURLING, ET AL.,)
)
Plaintiffs,)
) CIVIL ACTION
VS.)
) FILE NO. 1:17-cv-2989-AT
BRAD RAFFENSPERGER,)
ET AL.,)
)
Defendants.)

COALITION PLAINTIFFS' NOTICE OF FILING EVIDENCE

PART ONE

Coalition Plaintiffs give Notice of the Filing of Evidence in support of their Motion for Preliminary Injunction. The Coalition Plaintiffs will be filing said Motion, with supporting Brief, Proposed Order and additional evidence, on or before June 21, 2019. Because of e-filing size limitations, this evidence is filed in two parts. Part One contains Pages 1 through 287 of Exhibit A, the Consolidated Voters' Declarations; Part Two contains pages 288 and following of Exhibit A, and Exhibits B through I.

Exhibit A:	Consolidated Voters' Declarations
Exhibit B:	Declaration of Jeanne Dufort
Exhibit C:	Declaration of Rhonda Martin

1

Exhibit D:	Supplemental Declaration of Amber McReynolds
Exhibit E:	Declaration of Candice Hoke
Exhibit F:	Declaration of Virginia Martin
Exhibit G:	Declaration of Garland Favorito
Exhibit H:	Declaration of Megan Missett
Exhibit I:	Declaration of Pride Forney

Respectfully submitted this 19th day of June, 2019.

/s/ Bruce P. Brown

Bruce P. Brown Georgia Bar No. 064460 BRUCE P. BROWN LAW LLC 1123 Zonolite Rd. NE Suite 6 Atlanta, Georgia 30306 (404) 881-0700

/s/ Robert A. McGuire, III

Robert A. McGuire, III Admitted Pro Hac Vice (ECF No. 125) ROBERT MCGUIRE LAW FIRM 113 Cherry St. #86685 Seattle, Washington 98104-2205 (253) 267-8530

Counsel for Coalition for Good Governance

<u>/s/ Cary Ichter</u> Cary Ichter

Georgia Bar No. 382515 ICHTER DAVIS LLC 3340 Peachtree Road NE Suite 1530 Atlanta, Georgia 30326 (404) 869-7600

Counsel for William Digges III, Laura Digges, Ricardo Davis and Megan Missett

CERTIFICATE OF COMPLIANCE

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has

been prepared in accordance with the font type and margin requirements of

LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ Bruce P. Brown Bruce P. Brown

CERTIFICATE OF SERVICE

This is to certify that I have this day caused the foregoing to be served upon all other parties in this action by via electronic delivery using the PACER-ECF system.

This 19th day of June, 2019.

/s/ Bruce P. Brown Bruce P. Brown Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 5 of 301

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

DONNA CURLING, ET AL.,)
)
Plaintiffs,)
) CIVIL ACTION
VS.)
) FILE NO. 1:17-cv-2989-AT
BRAD RAFFENSPERGER,)
ET AL.,)
)
Defendants.)

INDEX TO CONSOLIDATED VOTERS' DECLARATIONS

Tab A (Bates No. 1)	Problems with Lt. Governor's Race
Tab B (Bates No. 011):	Problems with candidate affiliation or district
Tab C (Bates No. 026):	"Self-casting" ballots
Tab D (Bates No. 034):	Vote Flipping
Tab E (Bates No. 075):	DRE machines crashing
Tab F (Bates No. 079):	DRE machines not operational
Tab G (Bates No. 091):	Voters not given provisional ballots
Tab H (Bates No. 108):	Epollbook Problems
Tab I (Bates No. 324):	Long lines
Tab J (Bates No. 388):	Absentee ballots not received or returned

Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 7 of 301

Д

IN THE SUPERIOR COURT OF FULTON COUNTY STATE OF GEORGIA

COALITION FOR GOOD GOVERNANCE, RHONDA J. MARTIN, SMYTHE DUVAL, AND JEANNE DUFORT,

Plaintiffs,

CIVIL ACTION FILE NO. 2018CV31348

ROBYN A. CRITTENDEN, Secretary of State of Georgia, et al.,

v.

Defendants.

AFFIDAVIT OF CHRIS RAMIREZ

Appeared before me, the undersigned officer duly authorized to administered oaths, CHRIS RAMIREZ ("Affiant") who, after being sworn, states as follows:

- I am of lawful age and give this affidavit based on my personal knowledge.
- 2. I am a registered voter in Paulding County, Georgia.

3. I voted in the November 6, 2018 election at approximately 5pm on Election Day at Hiram High School.

4. I voted on an electronic touchscreen voting machine. I voted with standard settings on the screen and did not attempt to adjust the screen for enlarging the font or any other reason.

5. The screen presented choices for voting for one of three candidates or a write-in candidate for Governor. But that screen also presented only the name of Geoff Duncan as a candidate for for Lientenant Governor. I was dismayed and confused because I wanted to cast my vote for Sarah Riggs Amico.

6. I chose not to vote for Geoff Duncan who appeared to be the only choice for Lieutenant Governor, and scrolled to the next page to continue voting.

7. On the next electronic ballot page Sara Riggs Amico's name was listed but without the title of the race to put her name in context. I knew that I wanted to vote for Amico and pressed the area beside her name to cast my vote for her. I hope that my vote was counted for Amico.

8. I am concerned that other voters who may have been presented with only Duncan's name on the Lt. Governor's race on their electronic ballot page may have either voted for him assuming that the race was uncontested, or failed to vote in the race at all.

9. I feel fortunate to have found Amico's name and voted for her, although I only noticed it because I was very aware of the race, and was making an effort to cast my vote for her.

Further affiant sayeth not.

Chris Ramirez amilez 1/8/19

Sworn to and subscribed before me: On this day of knuary, 2019 Notary Public, State of A

My Commission Expires: <u>11/20/2021</u> SEAL

Page 1

IN THE SUPERIOR COURT OF FULTON COUNTY STATE OF GEORGIA

COALITION FOR GOOD GOVERNANCE, RHONDA J. MARTIN, SMYTHE DUVAL, AND JEANNE DUFORT,

Plaintiffs,

v.

ROBYN A. CRITTENDEN, Secretary of State of Georgia, et al.,

Defendants.

CIVIL ACTION FILE NO. 2018CV31348

AFFIDAVIT OF KATHY L. POLATTIE

Appeared before me, the undersigned officer duly authorized to administered oaths,

KATHY L. POLATTIE ("Affiant") who, after being sworn, states as follows:

1. I am of lawful age and give this affidavit based on my personal knowledge.

2. I am a registered voter in Columbus-Muscogee County, Georgia. I voted in the

November 6, 2018 election.

3. I voted at approximately 11 a.m. on October 19, 2018 in early voting at Citizen's Center in Columbus. I voted on an electronic touchscreen voting machine.

4. Part way through casting votes on my electronic ballot, I realized that I had not seen the Lieutenant Governor's race on my ballot, although it was a race I specifically wanted to be certain to vote. I was unsure what to do, and whether I should try to cancel my ballot and obtain a new electronic ballot from the pollworkers.

5. I remembered that in the past there was a review screen at the end of the ballot screens. I kept voting through the electronic ballot nervously hoping that the review screen would present me with the opportunity to vote in the Lieutenant Governor's race, although it was not on the original electronic ballot in the proper location following the Governor's race.

6. When the review screen appeared, I saw that the Lt. Governor's race was not voted, so I marked my choice electronically and proceeded to cast my ballot.

7. I am concerned that some voters may have failed to vote in the race as they may not have recognized that the Lt. Governor's race was missing from their original electronic ballot, and did not scrutinize the review screen before casting their ballot without voting in the Lt. Governor's race. They may not have seen that the review screen was offering a choice to vote in the race that was not previously offered at the right place on the ballot. Further affiant sayeth not.

Kathy Polattie

Sworn to and subscribed before me: On this <u>Bth</u> day of <u>January</u>, 2019 Knilling Hollowing Notary Public, State of <u>Georgia</u> My Commission Expires: <u>July 18,2022</u> ARNETRIS HOLLOWAY Notary Public - State of Georgia Muscogee County Vy Commission Expires Jul 18, 2022

SEAL

IN THE SUPERIOR COURT OF FULTON COUNTY STATE OF GEORGIA

COALITION FOR GOOD GOVERNANCE, RHONDA J. MARTIN, SMYTHE DUVAL, AND JEANNE DUFORT,

Plaintiffs,

CIVIL ACTION FILE NO. 2018CV31348

ROBYN A. CRITTENDEN, Secretary of State of Georgia, et al.,

V.

Defendants.

AFFIDAVIT OF TERRI R. THOMAS

Appeared before me, the undersigned officer duly authorized to administered oaths, TERRI R. THOMAS ("Affiant") who, after being sworn, states as follows:

- 1. I am a Georgia voter and registered at my home address of 6481 Brenda Ann Drive, Lithonia, Georgia 30058.
- 2. I voted at Lithonia High School on November 6, 2018 on a touchscreen machine.
- 3. The Lieutenant Governor's race did not appear on the first several pages of my touchscreen ballot. I had specifically intended to vote for Ms. Amico in the Lieutenant Governor's race, and was I upset that I had not been offered a vote in the race as I went through the pages of the ballot.
- 4. It was only when I got to the review screen that I saw the Lt. Governor's race, and I was able to then select Amico's name for that race. However, given that the machine was clearly malfunctioning, I have very little confidence that my vote was cast as I intended.
- 5. I am concerned that other voters, perhaps in more of a hurry to leave the polling place, may have also had the same malfunction on the machine and did not realize that the race was not present on the first touchscreen ballot page. They may not have taken the time to scrutinize the review screen as I took the extra time to do, specifically looking for Ms. Amico's name.
- 6. I was so troubled about not having the Lt. Governor race appear on my ballot that I contacted the Stacy Abrams campaign through an email to ask for an investigation of the missing race on electronic ballots.
- 7. Exhibit A attached is a true and correct copy of the email that I sent to the Abrams campaign.

Document #12 Filed 06/19/19 Page 14 of 301 Case 1:17-cv-02989-AT Further Affiant sayeth not.

Terri R. Thomas

Sworn to and subscribed before me: On this 6 day of <u>January</u>, 2019 Notary Public, State of <u>Georg</u> 9 My Commission Expires: 03/14/2019

OMISHOLA ADEYEMO Notary Public, Georgia Dekalb County on Expires

SEAL

Page 1

From: Terri Thomas <<u>mstt2u@icloud.com</u>> Date: November 7, 2018 at 10:28:46 AM EST To: <u>info@staceyabrams.com</u> Subject: FUNNY BUSINESS GOING ON AT MY VOTING LOCATION

Good Morning,

I'm reaching out to you to make you aware of a situation I encountered yesterday while voting.

After checking in and receiving my little yellow card I inserted it into the machine and began casting my votes. I'm a Ms. Abrams supporter and of course voted for her. Therefore, I wanted to make sure I voted for everyone on her ticket.

Everything was fine as I continued voting until I reached the end of the ballot and realized I'd not cast a vote for "Sarah Riggs Amico".

I saw 2 "pink squares" at the end of my ballot (1 pink square was for an amendment I knew I didn't vote on). I DID NOT cast my votes. Instead I hit the PREVIOUS PAGE button continually until I reached the beginning of the ballot (1st page) where Ms. Amico MAGICALLY appeared. I say "magically" is because her name was NOT, let me repeat that, HER NAME WAS NOT listed there when I began voting initially.

When I first began voting THERE WERE ONLY TWO names listed on page one! I remember this vividly because I remember thinking to myself, "Georgia is really making sure voters are clear on who we are voting for governor. Heck they ONLY put ONE category on this whole entire page and the rest this page is blank"???

Then as I stated earlier I continued voting and NEVER saw Ms. Amico's name. It wasn't until I saw that pink box and went all the way back did she once again, "MAGICALLY" appear!

I came home and my daughter and I were discussing our voting experiences. I told her what'd happened and that I almost missed voting for Ms. Amico. It was then that my daughter told me "Ms Amico's name was on the 1st page of HER ballot. I immediately begin to suspect some sort of funny business going on with the electronic voting system.

I voted at Lithonia High School and was the 268th person to vote yesterday morning. I know this because, I asked the worker about the turnout and that's when the worker told me that I was #268 so far.

With Mr Kemp being over this election, the voter suppression situation and the false hacking allegations, I STRONGLY/HIGHLY SUGGEST you investigate this matter to the fullest!

I DID NOT accidentally miss, skip nor bypass Ms. Amico's name. I was not rushed, I was not in a hurry, I'm retired and had the time in the world to cast my ballot properly. Her name simply wasn't there initially!!!

Aeri R. Show S Respectfully, Terri R. Thomas (678) 702-2025

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746

- My name is Shantreyonna Talley. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Fulton County in Georgia and my residence address is

College Park, Georgia

3. My individual circumstances are the following:

When I was early voting, the machine would not accept some of my answers. I would choose a candidate, and it would not show up. I was not able to vote for three candidates including the Lieutenant Governor.

- I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
- 5. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- 6. I declare under penalty of perjury that the foregoing is true and correct. Further affiant sayeth not, this the \underline{jQ} day of November, 2018.

Signature Mall

Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 18 of 301

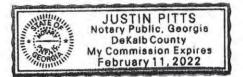
DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

- 1. My name is Joy Mary Belle Gronewald. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Cobb County, Georgia.
- I reside in Georgia's 11th Congressional District. I voted early at South Cobb Recreation Center in Austell, Georgia on Nov. 2, 2018. My ballot was for Georgia's 7th Congressional District.
- **4.** I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
- 5. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- 6. I declare under penalty of perjury that the foregoing is true and correct. Further affiant sayeth not, this the 475 day of November, 2018.

Joy Mary Belle Gronewald

Sworn to and subscribed before me This the 14-th day of November, 2018.

Notary Public



DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

- My name is Robin Joy Shahar. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of DeKalb County in Georgia and my residence address is

Avondale Estates, Georgia

- 3. On November 6, 2018 I served as a poll watcher during the statewide general election from 1:00 pm to 7:30 pm at Allgood Elementary School ("Allgood") located at 659 Allgood Road, Stone Mountain, Georgia 30083, in DeKalb County.
- 4. At all times that I was at Allgood serving as a poll watcher I wore a badge that identified me by name (specifically, "Robin Shahar"), as a poll watcher (specifically, "POLL WATCHER") with the name of the polling place (specifically, "ALLGOOD ELEM PRECINCT"), and the date of the election (specifically, "11/6/18 GENERAL ELECTION").
- 5. The Allgood voting area was in the school cafeteria.
- When I arrived at Allgood to begin my poll watching responsibilities, I immediately introduced myself to the poll manager and the poll workers.

- 7. The poll manager showed me where to sit, placing a chair near the entrance of the voting area. Each person who entered the voting area could see me and my poll watcher badge.
- 8. From my seat near the entrance, I could clearly see the table where voters completed their voting certificate, and could see and hear the poll worker who reviewed the voting certificates to ensure completion. After passing this poll worker, voters brought their certificates to poll workers who checked the certificates and voter identification. I could see these poll workers but could not hear them. I could also see the electronic voting machines, and the poll worker who distributed "I voted" stickers.
- 9. At Allgood, there was a separate table for voters who needed to complete a provisional ballot. The only part of the Allgood voting process that I could not clearly observe was the provisional ballot voting table. The table was across the room from where I sat, and I could not hear anything that occurred there. When a voter spoke to a poll worker at the provisional ballot voting table, I could see the voter's back, which blocked my view of the poll worker to whom she or he was speaking. This table was often staffed by the poll manager and one additional poll worker.

Voter 1:

- 10. At approximately 1:30 pm, while sitting at the location designated by the poll manager, a man ("Voter 1") approached and asked if he could speak with me. We left the cafeteria and spoke in the hallway.
- 11.Voter 1 told me that earlier in the day, he tried to vote at Allgood and was not permitted to cast a ballot or provisional ballot.
- 12. Voter 1 explained to me that he and his wife recently moved to a new home within DeKalb County and no longer lived in the Allgood precinct. He stated that he had changed his address in the system, and his wife had not. I did not ask him which system he was referring to.
- 13. Voter 1 explained that when he arrived at Allgood to vote earlier in the day, the poll worker who checked his identification stated that he would need to use a provisional ballot to vote.
- 14. Voter 1 told the poll worker he did want to vote a provisional ballot and he was directed to the provisional ballot voting table.
- 15. Voter 1 stated that the person at the provisional ballot voting table informed him that he was not permitted to cast a provisional ballot at Allgood and would need to vote at his new precinct.
- 16. Without my asking, Voter 1 identified the person who had not allowed him to cast the provisional ballot. He walked to a position where he could see

inside the cafeteria, and told me that the person who would not allow him to vote was wearing large hoop earrings. I walked over and saw that he was referring to the poll manager. I pointed to her and asked if that's who he was referring to, and he affirmed.

- 17.Voter 1 explained that he had returned to Allgood to accompany his wife who was now inside the Allgood cafeteria voting. He asked if I would help him exercise his right to cast a provisional ballot at Allgood. I asked Voter 1 if he had cast his ballot at his new precinct or elsewhere. Voter 1 told me that he had not.
- 18. I spoke to the Poll manager on behalf of Voter 1. I explained his recent change of address within DeKalb County and his experience at Allgood earlier that day. I told the poll manager that Voter 1 desired to cast a provisional ballot at Allgood.
- I told the poll manager that Voter 1 was legally permitted to cast a provisional ballot at Allgood.
- 20. The poll manager then allowed Voter 1 to cast a provisional ballot.
- 21. After casting his provisional ballot, Voter 1 thanked me and left the voting area with his wife.

Poll Manager Instruction Not to Speak with Voters:

- 22. At about 2:00 pm I asked the poll manager for the total vote tally, explaining that I had been asked to report those tallies every two hours. She gave me the vote tally.
- 23. The poll manager informed me that she had spoken with her supervisor, and that I was not permitted to speak to voters.

Voter 2:

- 24. At about 2:45 pm, while sitting at the location designated by the poll manager, I was approached by a woman (Voter 2) who asked to speak to me. We walked into the hallway, and eventually walked outside of the school.
- 25.Voter 2 told me she voted at Allgood at approximately 7:30 am that day. Voter 2 said that her ballot included a race which listed Karen Handel as the candidate and under her name showed her as a democrat. Voter 2 further explained there were two additional boxes for that race, both of which said "write in." No person was listed for that race as a republican candidate.
- 26. Voter 2 stated that she was concerned at the time she cast her ballot because she didn't think that Karen Handel's race should be on the Allgood ballot, and because she knew that Karen Handel is a republican. She felt like she should have said something to the poll staff at the time she voted, but didn't.

She said that the ballot issue had been bothering her all day, so she came back to the precinct to discuss what she saw.

- 27.I had been assigned an emergency contact person should I need assistance while serving as a poll watcher. Voter 2 and I called my emergency contact person so that Voter 2 could give him a report of what she had seen.
- 28.After Voter 2 left, I returned to the Allgood cafeteria and informed the poll manager of the information provided by Voter 2. I asked if she had received any similar complaints and she said she had not. I also asked her to let me know if any similar complaints arose. I thanked her and went back to the chair at the location designated by the poll manager.

Chairman Samuel Tillman:

- 29. While performing my poll watching duties Samuel Tillman, Chair of the DeKalb County Voter Elections Board aggressively approached me and chastised me about speaking to his staff and voters, and admonished me about not speaking to staff or voters again.
- 30. At approximately 4:00 pm I temporarily moved from the location designated by the poll manager to a chair at a cafeteria table that was set up adjacent to the back-side of the voting machines, as I needed a table to lean on to better support my back. I sat in a chair that was immediately behind the poll worker handing out "I voted" stickers. I could still observe the

entire voting area other than the provisional ballot table. I was not easily visible to people entering the cafeteria to vote, but there were few voters at that time.

- 31.Shortly after moving to this location, I saw that the poll worker handing out stickers appeared to have dropped something, and was looking around to find it. I approached her and asked if I could help her. She stated that she had lost her poll worker badge, but that she would get a temporary one from the poll manager if she couldn't find it.
- 32. As I was speaking to the poll worker, Mr. Tillman approached and chastised me sternly for talking to his staff. When I explained that I was attempting to assist the poll worker find her lost badge, Mr. Tillman said that I knew very well that I was not allowed to talk to his staff for any reason, or with voters.
- 33. I said that I had done nothing wrong. I asked him a few times what specifically he thought I had done that was not allowed. Each time he stated that I knew what I had done.
- 34.Mr. Tillman pointed to his gold nameplate and told me that he was the Chair of the DeKalb County Board of Voter Elections. He said he had been contacted by the Allgood staff about me, and that's why he had come to the Allgood precinct. I asked which staff person had contacted him, and he

responded "who do you think." I asked if the poll manager was the person who called him, and he did not respond.

- 35. I told him that I had spoken with the poll manager about a serious ballot issue (referring to the complaint of Voter 2), and that I believed it was appropriate to inform her of complaints arising at her precinct. He asked why I thought I had the right to inform her of the information. I responded by asking if he was curious to hear about the issue complained of, which I believed was serious. He said fine, and I explained the complaint of Voter 2. Mr. Tillman again asked why I thought I had the right to inform the poll manager of the complaint. I responded that I thought it was respectful to inform her.
- 36.Mr. Tillman responded by saying that I was not permitted to speak to any of his staff for any reason, and was not permitted to talk to voters.
- 37. I informed Mr. Tillman that I had done nothing wrong. I told him that I was a lawyer and knew my legal rights. I said that I would continue to perform my poll watcher duties, which I was legally allowed to do. I also told him that, as a poll watcher, I would periodically, and at the closing of the polls, ask the poll manager for vote totals.
- 38. Mr. Tillman agreed that I had the right to request the vote total information, but reiterated that I was not permitted to talk with his staff or voters.

- 39. I walked away from Mr. Tillman and sat at the location designated by the poll manager, to continue my poll watching duties. After I walked away from him, Mr. Tillman stood and watched me for approximately forty-five minutes. During a twenty (20) minute portion of this time, Mr. Tillman was joined by a DeKalb County sheriff.
- 40. At one point after the sheriff left, I went outside to call my emergency contact and inform him about Mr. Tillman's hostility, the temporary presence of the DeKalb County Sheriff, and Mr. Tillman's directive not to speak with voters. I asked if I could get assistance at Allgood because I was not comfortable being there alone, but also stated that I felt able to return to the cafeteria and continue my poll watching duties if no assistance was available. My emergency contact stated that he would inquire about getting a second poll watcher to assist me. He called me later to say that there was not another poll watcher available.
- 41.After the call with my emergency contact, I reentered the Allgood school building. I entered the building at the same time that a voter was entering. The voter was wearing a Philadelphia Eagles football jersey. I told him I was from Philadelphia. The voter proceeded to tell me about his brother who lives in Philadelphia and his brother's accomplishments. I listened to the voter, and at no time engaged in any conversation related to Georgia or the

election. Mr. Tillman approached the voter and me (we were inside the building, but standing near the school's entrance) and angrily said to me "you're doing it again." I explained that the voter and I were just chatting about Philadelphia and the voter's family. The voter confirmed this and Mr. Tillman said he didn't care what I was talking about, and that I was not permitted to speak to voters.

42.I thanked the voter for coming out to vote, waited for the voter to walk into the cafeteria, and then went back to the location designated by the poll manager to continue my poll watching duties. Thereafter, I did not see Mr. Tillman again.

Voter 3:

- 43. At approximately 5:00 pm I observed Voter 3 walk to the provisional ballot voting table and then leave quickly, which caused me to believe that she had not cast a provisional ballot. I followed Voter 3 and spoke with her outside of the school building.
- 44. I asked Voter 3 if she had voted. She told me she lived nearby, but was told by a poll worker that she was in the wrong precinct and could not cast a provisional ballot.
- 45. I asked Voter 3 if she intended to go to the correct precinct. She said no, she just wanted to go home. She was visibly upset. I told Voter 3 she had the

right to cast a provisional ballot and offered to assist her. Voter 3 insisted she just wanted to go home.

- 46. At this point a poll worker ran out the door and asked Voter 3 what had happened. Voter 3 explained what happened. The poll worker and I encouraged Voter 3 to return to the voting area and cast a provisional ballot. Voter 3 agreed and went back into the cafeteria with the poll worker. I remained outside.
- 47. Shortly thereafter, while I was still outside, Voter 3 walked out the door and was again visibly upset. She explained to me that she had gone back to the provisional ballot voting table. She stated that at the provisional ballot voting table, she was told that I had no right to speak to her, and that she was not allowed to cast a provisional ballot. She said that she wanted to file a complaint.
- 48. While Voter 3 was explaining to me what had happened, the poll manager came outside to talk with Voter 3; I had the impression that the poll manager wanted to find out why Voter 3 was angry, but am not certain. Voter 3 angrily told the poll manager that she (the poll manager) wrongly denied Voter 3's right to vote. The poll manager denied this and said to Voter 3 that she never said that. Voter 3 also complained that the poll manager had told her that I had no right to talk with Voter 3. The Poll manager and Voter 3

argued for a while about what the poll manager had actually said. I eventually interrupted and asked the poll manager if she would allow Voter 3 to go inside now and cast her provisional ballot. The poll manager said "yes." I suggested to Voter 3 that she go inside and vote.

49. Voter 3 returned to the cafeteria and cast a provisional ballot. I returned to the area designated by the poll manager to resume my poll watching duties.

Poll Closure:

- 50. I left the polling place at the close of the polls, after receiving the final vote tallies from the poll manager.
- 51.As I was preparing to leave the cafeteria, the poll worker who had been handing out the "I voted" stickers approached me. She thanked me for offering to help her find her poll worker badge, and apologized for what happened with Mr. Tillman. I told her that it was fine, and that there was no need for her to apologize. She said she felt sorry about how Mr. Tillman had responded to me.

Voter 4:

52. On November 8, 2018, I took a car sharing service from work to home. During the ride, I talked with a relative on the phone about many things, including the experience of Voter 2 at the Allgood polling location. The car driver could hear my side of the phone conversation.

- 53. I finished my phone conversation just as the driver pulled up to my house. As I was about to get out of the car, the driver said to me, "that happened to me too." I was not sure what she was talking about and asked.
- 54. The driver (Voter 4) explained that she had voted at Marbut Elementary School in DeKalb County at approximately 10:00-10:30 on November 6th. She said that for one of the races on the ballot, there was a republican candidate listed as a democrat, and no candidate listed as a republican. She said that while she was at the voting booth, she called over a female poll worker to show her the ballot problem. Voter 4 said that the female poll worker responded in a hostile manner. Voter 4 said that eventually a man came over and told Voter 4 that if she did not agree with what was on the ballot, she should skip that race. Voter 4 was not certain whether the man was a poll worker. Voter 4 did as instructed, skipped that race and cast her ballot.

Affirmation:

- 55.I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
- 56. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in any way as anything other than a witness in this litigation. Though I am a

lawyer, I am giving this Declaration as a Georgia citizen, and not in my attorney capacity.

57. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 13th day of November, 2018.

Robin Joy Shahar

Sworn to and subscribed before me This the 1316 day of November, 2018.

E NOTA91 STOR

Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 34 of 301

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746

- My name is Vernon Jones. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Chatham County in Georgia and my residence address is Savannah, GA,
- My polling location is Liberty City Community Center, 1401 Mills B Lane Blvd., Savannah, GA, 31405.
- 4. My individual circumstances are the following:
 - a. On Election Day I went to cast my ballot at the Liberty City Community Center. I walked up to the machine and made selections for both candidates and ballot initiatives. After my selections were made, I pressed next to see the review page. I am a longtime voter and have always been able to review my votes, prior to permanently casting my ballot.
 - b. However, instead of allowing me to review my votes, the machine automatically cast them. I explained what happened to the poll workers and asked if there was anyway to review my votes in order to ensure that there were no issues. I was told it would be impossible to check and that there was no problem with the machine.

026

- c. As I continued to debate this with the poll workers, the voter behind me also experienced issues with the same voting machine. He inserted his voting card but the machine failed to bring up any information.
 Multiple poll workers also tried but the card would not work.
- **d.** At this point, both the poll workers and voters were frustrated because it did not seem like there was anything that could be done about the voting card issue. The supervisor of the polling location decided to shut this same machine down. I was never able to validate my vote.
- I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
- 6. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 16 day of December, 2018.

Vernon Jones

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

- My name is Durga Shah. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of DeKalb County in Georgia and my residence address is

Decatur, GA

- I have reviewed the list below and I believe that my situation most closely fits into the category that I have checked:
 - a. ____ I requested an absentee ballot but I never received it.
 - b. _____ I received an absentee ballot and returned it but my ballot was rejected.
 - c. _____ I received an absentee ballot and returned it but my ballot was not accepted.
 - d. _____ I was not permitted to vote using a voting machine (a DRE) (circumstances below) and was not offered a provisional ballot even though I reside in the county in which the precinct was located where I tried to vote.
 - e. ____ I was not permitted to vote using a voting machine (a DRE) (circumstances below) because I was told I was not a resident of the

county in which I was attempting to vote despite the fact that I had changed my address in a timely manner.

- f. _____ I was not permitted to vote using a voting machine (a DRE) (circumstances below). I asked for a provisional ballot but was told that it was too early in the day for provisional ballots or that there were not enough provisional ballots or that no provisional ballots remained.
- g. ____ I moved counties but did not change my registration address.
 When I attempted to vote in my new county, the poll workers told me to return to my old county in order to vote.
- h. _____ There were long lines at my polling location and I saw people leaving without voting.
- i. _____ There were long lines at my polling location and I had to leave without being able to cast my vote.
- j. ____X_ There were problems with the voting machines at the precinct at which I voted or attempted to vote.
- k. ____ Other please explain _____
- 4. My individual circumstances are the following:

I went with my husband and daughter to vote at the First Christian Church in DeKalb County on November 2,2018. I inserted the yellow card into the voting machine as instructed. At one point I wanted to go back a screen to review my selections so I hit the "Previous" button and then the machine flashed the message "Vote Recorded" and spit out the yellow card. I was never shown a Summary page to review my selections. On November 6, 2018, I was concerned about my vote and whether or not it was counted and contacted 866OurVote for guidance. I was told that if the yellow card was spit out it meant my vote was counted. When I started to hear about all of the voting problems that people were experiencing I decided to go to My Voter Page. My Registration status was listed as "Active" and then changed to a "Registration Not Found".

I emailed the Dekalb County Board of Electors and was told that they had two registrations under my name (one had my name misspelled). Mary Francis Weeks at the Board of Electors informed me that my records were merged into one and that my vote was now counted.

I am very concerned that I wasn't given a chance to review my ballot before it was counted and about the process I had to go through to ensure my vote was counted. Given the two records listed for me I am also concerned that my vote didn't actually get counted until I resolved the issue on Friday.

- I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
- 6. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- 7. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 14^{-14} day of November, 2018.

ga Shah

Durga Shah Signature

Sworn to and subscribed before me

This the 1414 day of November, 2018.



DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

- My name is Grace Ann Young. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of DeKalb County and my address is

Decatur, GA,

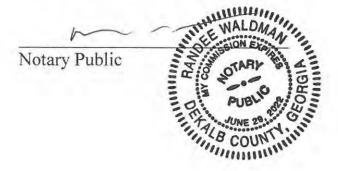
- 3. My individual circumstances are the following:
 - a. I voted on October 15th, the first day of Early Voting. I voted with the machine and chose the straight Democratic ticket. Something popped up on the screen as if it were going to let me review my vote, but then the screen suddenly said that I had voted. I did not click "cast my ballot" or do anything else.
 - b. I had just read the day before about machines switching your vote when you vote straight down the ballot. I wondered if this happened to me because I had voted straight down the ballot. The poll worker checked my card and said that I had cast my ballot.
 - c. I asked the poll worker if my vote said I had voted Democratic but the poll worker could not tell. I think that my vote was cast but I was worried that had been changed or flipped. I absolutely did not push

the button to cast my ballot and I know I didn't get a chance to look over my vote.

- **4.** I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
- 5. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- 6. I declare under penalty of perjury that the foregoing is true and correct. Further affiant sayeth not, this the $\frac{12^{14}}{12^{14}}$ day of November, 2018.

Grace Ann Young

Sworn to and subscribed before me This the \underline{l}^{μ} day of November, 2018.



Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 43 of 301

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

- I am Teri Coley Adams. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I reside at Cochran Georgia,
- I voted early in the November 6, 2018, federal election in Georgia. I voted on or about October 17, 2018.
- 4. I voted for Stacey Abrams for governor.
- As I was near completion of my voting, the synopsis page change my vote from Abrams to Kemp.
- When this happened, I restarted the process and again, my vote for Abrams was again changed to Kemp before my very eyes.
- 7. On the third time my Abrams vote was properly cast.
- After hearing news reports that others were having problems, I reported what happened to me to the poll workers at the Bleckley County Courthouse, where I had voted. I let them know it was machine no. 2.
- 9. Their only response was "did it take your vote?"
- I give this Declaration freely, without coercion and without expectation of reward.

- 11. I understand that in giving this Declaration, I am not represented by a lawyer, nor has any lawyer asked me to be their client or to serve in anyway other than as a witness in this litigation.
- 12. I declare under penalty of perjury that the foregoing is true and correct.

FURTHER AFFIANT SAYETH NOT.

This 13 day of November, 2018.

dans oley Adams

Sworn to and subscribed before me This the 13 day of November, 2018.



Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 46 of 301

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR <u>SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW</u>

- My name is Tiffany Alridge. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Henry County in Georgia and my residence address is

Stockbridge, Georgia

3. My individual circumstances are the following:

On two occasions when I was early voting, I picked a Democratic candidate and the Republican candidate would be highlighted. This happened when I voted for Stacey Abrams and one other candidate. I told a poll worker who told me to go in and push it again. I reviewed my ballot at the end, and it showed that I had voted for Kemp. I went back and chose Stacey Abrams. I did not review my ballot again.

- **4.** I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
- 5. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- I declare under penalty of perjury that the foregoing is true and correct.
 Further affiant sayeth not, this the <u>15t</u> day of November, 2018.

Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 47 of 301

Aludge Main Signature

Sworn to and subscribed before me This the 1549 day of November, 2018.

Notary Publ



Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 48 of 301

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

- My name is Rita Awan. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Dekalb County in Georgia and my residence address is

Atlanta, GA

- 3. For the 2018 Georgia General Election, I voted early and experienced a ME He of the offer that selected candidates different than those I selected to vote for.
 - a. I early voted at Memorial Drive in Dekalb County. This was the first or second day that voting opened up at that location. It was probably a Thursday, sometime in the afternoon.
 - b. When voting, I took my time reading through the candidates and amendments. Whenever I vote, I carefully re-read through my responses.
 - c. When reviewing all my responses on the end screen, I noticed that a candidate that I did not select was showing. I know for a fact that I did not choose this candidate.

LA

- d. I don't remember who the candidate was, or if it was for a local or statewide election, but it showed a Republican candidate chosen, when I definitely voted for the Democratic candidate.
- e. I did not notify a poll worker, but I made the correction myself by going back and changing it, before casting my ballot.
- 4. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
- 5. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- 6. I declare under penalty of perjury that the foregoing is true and correct. Further affiant sayeth not, this the μ_{μ} day of November, 2018.

a Quan

Sworn to and subscribed before me This the $\underline{10}$ day of November, 2018.

W Camt Allha

Glen Paul Freedman NOTARY PUBLIC Fulton County, GEORGIA My Commission Expires 11/5/19

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

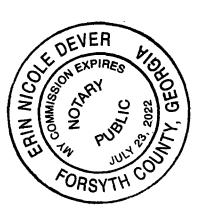
- My name is Allison Bish. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Gwinnett County in Georgia, and my residence address is Dacula, Georgia Dacula. I currently work as a paralegal at
- 3. I voted early for the November 6, 2018, General Election, at the Dacula Park Activity Building in Gwinnett County. Specifically, I arrived at the Dacula Park Activity Building on October 20, 2018, at around 10:30 a.m., maybe 11:00 a.m.
- 4. I checked in and went to a voting machine booth. I pressed the screen to select Stacey Abrams for governor, but the machine changed my selection to Brian Kemp. I noticed immediately and changed my selection back to Stacey Abrams. I made the rest of my selections and did not experience any issues with the rest of them.
- 5. When I did a final review of all of my selections, however, I saw that the machine was showing Brian Kemp again. So I went back and again selected Stacey Abrams.
- 6. But again—which was now the third time—the machine changed my selection to Brian Kemp. And so for the third time, I corrected my selection back to Stacey Abrams. After my third correction, the voting machine finally showed Stacey Abrams as my selection, and I was able to cast a correct ballot.

040

- 7. If I hadn't in fact experienced this same issue previously at my prior precinct (I just moved to Dacula in 2017), then I'm not sure I would have noticed on the final selections screen that the voting machine had changed my vote to Brian Kemp. But luckily, I was aware of the possibility that the machines could switch votes, and I was on the lookout for it when I voted on October 20, 2018.
- 8. For other voters who had no idea that the machines could switch votes, however, they could have very easily cast their ballot without ever realizing that the machine had changed their vote to the wrong candidate.
- 9. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
- 10. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- 11. I declare under penalty of perjury that the foregoing is true and correct. Further affiant sayeth not, this the $\frac{14}{2}$ day of November, 2018.

Sworn to and subscribed before me This the $\underline{|4|^{4}}$ day of November, 2018.

de Derrea



Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 52 of 301

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

- My name is Sheena Brinson. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of DeKalb County in Georgia. My residence address

Lithonia, GA

- **3.** I have reviewed the list below and I believe that my situation most closely fits into the category that I have checked:
 - a. _____ I requested an absentee ballot but I never received it.
 - b. _____ I received an absentee ballot and returned it but my ballot was rejected.
 - c. ____ I received an absentee ballot and returned it but my ballot was not accepted.
 - d. _____ I was not permitted to vote using a voting machine (a DRE) (circumstances below) and was not offered a provisional ballot even though I reside in the county in which the precinct was located where I tried to vote.
 - e. ____ I was not permitted to vote using a voting machine (a DRE) (circumstances below) because I was told I was not a resident of the

042

county in which I was attempting to vote despite the fact that I had changed my address in a timely manner.

- f. _____ I was not permitted to vote using a voting machine (a DRE) (circumstances below). I asked for a provisional ballot but was told that it was too early in the day for provisional ballots or that there were not enough provisional ballots or that no provisional ballots remained.
- g. ____ I moved counties but did not change my registration address.
 When I attempted to vote in my new county, the poll workers told me to return to my old county in order to vote.
- h. _____ There were long lines at my polling location and I saw people leaving without voting.
- i. _____ There were long lines at my polling location and I had to leave without being able to cast my vote.
- j. <u>x</u> There were problems with the voting machines at the precinct at which I voted or attempted to vote.
- k. ____ Other please explain -_____
- 4. My individual circumstances are the following:

I voted in person on election day at Fairington Elementary School in DeKalb County. I did not have any issues waiting in line; everything seemed fine. I received my yellow voting card and put it in the machine. When it got to the page where I could begin selecting the candidates that I wanted to vote for, I very carefully and deliberately selected Stacey Abram's name. There is no question in my mind that I selected Ms. Abrams, as I was very confident that I wanted to vote for her. However, when I selected her name, the screen blinked quickly and then showed that I had selected Brian Kemp for governor. This made my heart flutter to see this happen in front of me.

I immediately backed away from the machine and called a poll worker for assistance. I explained to her what had happened, pointing at who I had selected but showing her that the machine said that I was voting for the other candidate. She backed all the way out so that I had to start from the beginning.

After that, I was able to select Ms. Abrams' name. At the end, when I was given a summary of my selections, I made sure that each of them accurately reflected what I had chosen. I believe that my vote was cast successfully. However, I am worried about other people who may not have noticed if the same thing happened to them. For example, people who are elderly might not have realized that their votes were changed. I am worried

that people left without realizing that their votes had been recorded incorrectly.

- I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
- 6. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- I declare under penalty of perjury that the foregoing is true and correct.
 Further affiant sayeth not, this the _____ day of December, 2018.

Ar.

heen Brinson

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746

- My name is Amari Fennoy. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Fulton County in Georgia and my residence address is

Atlanta, GA

- 3. My individual circumstances are the following:
 - **a.** I am a Senior at Spelman College.
 - b. On Election Day, I voted at Lindsey Street Baptist Church. When it was my turn to vote, I went to voting booth one. I clicked Stacey Abrams to vote for her for Governor but as I was about to click the next button I saw that the machine switched my vote to Brian Kemp's name. I then had to click Stacey Abrams's name three times to make my vote switch over to her.
 - c. I did not notify the poll workers, I didn't believe it would make much of a difference. The poll workers appeared busy dealing with other issues at the time. However, immediately afterwards I called the NAACP and the DPG (Democratic Party of Georgia) voting hotline because I believed both were staffed by attorneys and that they would be more able to help me.

- d. It troubles me greatly that my vote kept switching away from Stacey
 Abrams. I hope someone fixes these voting machines.
- **4.** I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
- 5. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- 6. I declare under penalty of perjury that the foregoing is true and correct. Further affiant sayeth not, this the $\underline{14}$ day of february, 2019.

1. P.C. M.

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746

- My name is Shirley Francois. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of DeKalb County in Georgia and my residence address is

Dunwoody, GA

- 3. My polling location is Peachtree Junior High School in Dunwoody.
- For the 2018 Georgia General Election, my voting machine seemed to malfunction when I tried to vote for my preferred candidates.
 - a. When I voted on my voting machine on Election Day, for the first question, I pressed the button for the Democratic Candidate, and noticed that it immediately jumped to the Republican. This happened at least twice.
 - b. I couldn't get it to work, so became curious and wanted to see what happened when I pressed Republican. And it stayed there! So then I changed it back to Democrat.
 - c. I then went through all the other pages, and when I got to the end to the summary, I saw that the screen was showing all Republican candidates, whom I had not chosen.
 - d. I went back and changed all my votes. I had to press the button for my candidate two or more times to get it to stay on my answer.

048

- e. Eventually I was able to cast my ballot with my selections, but I am concerned that it took so much effort.
- 5. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
- 6. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- I declare under penalty of perjury that the foregoing is true and correct.
 Further affiant sayeth not, this the _____ day of December, 2018.

Many chom

Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 60 of 301

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

- My name is Jacqueline Holt. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Meriweather County in Georgia and my residence address

is Grantville, GA

- 3. My individual circumstances are the following:
 - a. I voted early the week before the election. I think the 30th or 31st of October. My polling location was quiet and not busy when I arrived a little before 9 a.m., around 8:45 a.m.
 - b. When I voted, I used my nail-finger to choose the Democratic candidate for the second question (the first question went fine, voting for Stacey Abrams for Governor). For the second question the machine selected a Republican.
 - c. I told the poll worker who said I should use a pencil eraser instead of my finger to vote. The poll worker told me to press Republican again, then the option for both Democratic and Republican candidates came back up for the second question.

- d. At the end screen, I reviewed to see that all the votes were correct,
 which they were, but the computer change in the second question to
 Republican made me suspicious.
- 4. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
- 5. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- I declare under penalty of perjury that the foregoing is true and correct.
 Further affiant sayeth not, this the <u>15</u> day of November, 2018.

Jacqueline Holt

Sworn to and subscribed before me This the 15 day of November, 2018.

hr VVacaseo Notar

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746

- My name is Claudine Kelsey. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Cobb County in Georgia and my residence address is

Marietta, GA.

- My polling location is BIRNEY ELEMENTARY SCHOOL-BR01, 775
 SMYRNA POWDER SPRINGS RD, MARIETTA, GA 30060.
- For the 2018 Georgia General Election, as I voted, my voting machine repeatedly changed my choice to candidates I did not choose.
 - a. My husband and I vote in Cobb County. We have been in Cobb County for the last six years.
 - b. On Election Day, November 6, 2018, my husband and I went to the Main Office on Whitmore Ave for Early Voting on October 19th.
 - c. When I pressed my choice for Governor, the selection automatically changed to the person I didn't choose.
 - d. I tried to hit it again and it reflected the same person again -- not the person I selected.
 - e. On the third time it worked and selected the person I wanted to vote for.

- f. After making all my selections, I double checked to make sure my vote was actually my vote as intended. I do not know if it worked in the end. The same thing happened when I voted in the Presidential election in 2016.
- g. But this year, it alarmingly took three whole tries to get my vote right.
- **5.** I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
- 6. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- I declare under penalty of perjury that the foregoing is true and correct.
 Further affiant sayeth not, this the <u>IqH</u> day of November, 2018.

Claudine Kelsey

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746

- My name is Pamela Lee. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Wheeler County in Georgia and my residence address is

Alamo, GA,

- For the 2018 Georgia General Election, I voted early. I experienced a malfunctioning voting machine and my vote has not been accounted for.
 - a. I have been registered to vote since 1976 and have voted at the Community Center in Wheeler County for years.
 - b. On November 1, 2018 I went to the Community Center with my 18 year old granddaughter to vote early.
 - c. At the machine, when I selected Janice Laws on my ballot, the selection changed/jumped to a different candidate above Janice Laws.
 - d. I asked the poll worker what I should do and was told to back out of that selection and try again. On the second try I was able to cast my ballot.
 - e. As of 11/15/2018, the Secretary of State's "My Voter" page does not show that my early vote was cast. My grandaughter, Te'nailynn Lashaun Wilcox, who voted early on November 1, 2018 for the first

054

time, also does see her vote appear on the Secretary of State's "My Voter" page.

- **4.** I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
- **5.** I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- 6. In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the $\underline{/9}$ day of November, 2018.

<u>Famela Lee</u>

Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 66 of 301

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

- My name is Joycelyn Lester. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Early County in Georgia, and my residence address

Blakely, Georgia

- I voted early for the November 6, 2018, General Election, at the Registrar's Office in Blakely, Georgia.
- 4. I voted using the voting machine, and I pressed the button that said "Stacey Abrams." But my selection showed up as "Brian Kemp." I kept pressing "Stacey" to correct the selection, and by the fourth time I pressed her name, the machine finally corrected. I did not have a problem with any of the other candidates.
- 5. If I weren't paying more attention, or were less persistent, it would have been easy for the machine to incorrectly cast my vote for Brian Kemp. And I can see how a less persistent or attentive person could have the machine incorrectly cast their vote for Brian Kemp when they were meaning to vote for Stacey Abrams.
- 6. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.

- 7. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- 8. I declare under penalty of perjury that the foregoing is true and correct. Further affiant sayeth not, this the |4| day of November, 2018.

Juply Listo gnapure

Sworn to and subscribed before me This the <u>14</u> day of November, 2018. My Commission Expires March 2, 2021 Notary Public

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746

- My name is Betty Millett. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of WARREN County in Georgia and my residence address is Warrenton, GA.
- 3. My individual circumstances are the following: I have been registered to vote in Warren County for over twenty (20) years. My polling station is the Community Services Building in Warrenton, GA. This year I participated in early voting. I went to cast my vote on November 1, 2018.
- 4. Before I went to my polling station, I was warned by my niece, who had also voted early and voted before me, that she had experienced issues with the voting machine. She told me that when she went to cast her vote for governor for Stacey Abrams, that the machine checked Brian Kemp's name.
- 5. When I went to vote, I experienced the same thing. I pressed on Stacey Abrams, but the machine checked Brian Kemp. I could not figure out why the machine did this or how to fix it, so I called one of the poll workers over to help me. The poll worker immediately told me how to fix this, as if she had known about the problem before hand. She told me to press Kemp's name and that this would clear the machine and then I could vote for

Abrams and this time it should count properly. I did as I was instructed, and it seemed to work.

- 6. I have been voting in Warren for twenty years and I have never encountered a problem like this. I also thought it was very suspicious that these problems only happened with my vote for Governor.
- 7. When I went to my polling station, I was aware that there may be issues with the machines because I was warned ahead of time. Because I was warned, I was paying attention and caught the error that the machine made which would have cast my vote in error. I can only imagine how many people, who were not warned ahead of time, ended up casting a vote for Kemp when they intended to vote for Abrams.
- 8. When I returned to the Senior Center, I had a discussion with someone else who encountered the same problem with the voting machines at our polling station.
- 9. There used to be a time in my life when I did not vote because I believed that my vote did not matter. But then I realized that if I want to have a say, if I want to have a voice, I have to vote. I have voted in every election since coming to this realization, going back almost twenty years. I believe that it is very important for us to vote because it is how our voices are heard. I was extremely disturbed by what happened to me at my polling station. It

happened to me and at least two other people that I am aware of, so I even called the news, WJBF, to tell them that this was going on. I hoped that they would report on this so that others would be prevented from potentially casting their votes in error. I am not sure if they did.

- 10.I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
- 11.I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- **12.** I declare under penalty of perjury that the foregoing is true and correct. Further affiant sayeth not, this the $\frac{30}{40}$ day of November, 2018.

Betty Millell

Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 71 of 301

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746

- My name is Jesse James Morris, Jr., I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I reside at Conyers, GA
- I am a student at Georgia State University and I am a resident of Chatham County in Georgia.
- I voted with my wife on election day. We voted at the Port Wentworth precinct, (Lake Shore subdivision) at approximately 3:30 p.m.
- 5. There were problems with the voting machines at the precinct at which I voted. I attempted to vote for the Democratic candidates for Governor and Lt. Governor. After I finished voting, I was reviewed the votes I had cast. My vote for Lt. Governor had flipped to the Republican candidate. I switched it back to the Democratic candidate. Then I saw that my vote for Governor had switched to the Republican candidate.
- 6. I notified the election officials at the precinct.
- I then tried to correct my vote, but the card would not stay in the voting machine. I
 had to force it to stay in and hold it in. I am not sure my vote was counted correctly.
- I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.

- 9. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- **10.**In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 19th day of November, 2018.

1 anis Signature

Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 73 of 301

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

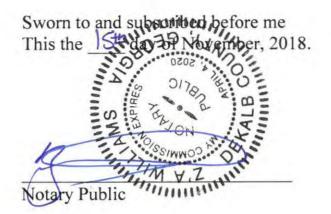
- My name is Marcus Napper. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Dekalb County in Georgia and my residence address is

Lithonia, GA . I am registered to vote at this address.

- I vote at the polling location associated with my residence address: LITHONIA HIGH SCHOOL, 2440 PHILLIPS ROAD, LITHONIA, GA 30058.
- **4.** For the 2018 Georgia General Election, I received poor help from the poll workers at my polling location and could not complete the process of voting.
 - a. On Election Day, November 6, 2018, I showed up to vote at Lithonia High School. After checking in with a poll worker, I went to a voting machine.
 - b. When I voted at the voting machine I received a notification, "ballot did not register" indicating that my vote did not count. At that time I called over the elections official to flag the issue. She took my voter card and put it into two other machines to verify my voting card was working.

- c. After seeing that the voting card was functioning she was satisfied that my ballot was submitted. However, I never was able to select my candidates and receive a confirmation that my ballot was received. Once she verified my card was working I was not permitted to return to the voting machine to select my candidate and attempt to vote again.
- d. Additionally, when my daughter, Brianna voted, the machine switched from Abrams to Kemp.
- e. I was disallowed from choosing candidates on my electronic ballot card at Lithonia High School, due to a poll worker who would not let me choose candidates after verifying my electronic ballot.
- 5. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
- 6. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- 7. I declare under penalty of perjury that the foregoing is true and correct. Further affiant sayeth not, this the 15 day of November, 2018.

Marcus Napper



- My name is Laurie Nicholas. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Gwinnett County in Georgia and my residence address is

, Loganville, Georgia

- 3. My individual circumstances are the following: While early voting, I clicked Stacey Abrams and the X popped up in the Kemp box. I pressed Stacey Abrams again. I also pressed the Kemp box to see if that would take the X out. It took three clicks to get my vote right. I reviewed my ballot at the end, and it showed that I had voted for Stacey Abrams.
- I give this Declaration freely, without coercion, and without any expectation
 of compensation or other reward.
- 5. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 19 day of November, 2018.

hicholas

- My name is Stephanie Sudden. I am over eighteen years of age and competent to testify to the matters contained herein.
- I am a resident of DeKalb County in Georgia and my residence address is
 Stone Mountain, GA
- I vote on October 27, 2018 at 11:00 a.m. The location as crowded with little seating and the workers were clearly overwhelmed.
- 4. When I arrived, I was told to complete a lengthy, multipage document prior to voting. I have participated in early voting before but I have never had to complete this form before. The document appeared to be a provisional voting form but I am not certain what it was. After completing the document, I took it to the window and, after waiting for several minutes while someone reviewed the document, I was given a yellow card to vote.
- I went to the voting machine but, when I selected a candidate for each position, I often had to click my selection more than once.
- 6. When I got to the end of the ballot, the summary page reflected only some of my choices and I had to go back and re-select candidates again.
- When I got to the "Cast Ballot" page again, I clicked "Cast Ballot" and the machine clicked off. I brought this to the attention of a poll worker who said

they had been having problems with the machine that day. The problem seemed to be simply accepted by the poll worker and no other attention was given to it.

- I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
- **9.** I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- 10.In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 19 day of November, 2018.

udd

Signature

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

- My name is Donna Traylor. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Cobb County in Georgia and my residence address is

Austell, Georgia

3. My individual circumstances are the following:

I participated in early voting at the South Cobb Recreation Center. When I voted for Stacey Abrams, it defaulted to Brian Kemp. This happened three times. I kept hitting the back button. Finally, instead of checking the box, I put my finger on it. I reviewed my ballot before I cast my vote, and it showed that I voted for Stacey Abrams.

- I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
- 5. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- I declare under penalty of perjury that the foregoing is true and correct.
 Further affiant sayeth not, this the 15 day of November, 2018.

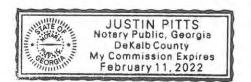
Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 80 of 301

m

Signature

Sworn to and subscribed before me This the <u>15</u> day of November, 2018.

Notary Public



- My name is Wanda Williams. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Gwinnett County in Georgia and my residence address is

Snellville, GA

3. My individual circumstances are the following:

I voted on election day. At the registration desk, my drivers' license would not scan, so the poll worker manually entered my information. When I was voting, I clicked on Stacey Abrams and the machine defaulted to Kemp. I called for help and two poll workers came over. One poll worker said that I clicked on Kemp by mistake. I said that I certainly did not and asked him to try it. He clicked on Stacey Abrams and it defaulted to Kemp again. He said let's back out and you can start over. I asked him to wait and see if it worked. That time the machine did not change my vote. I completed my ballot and reviewed it at the end. Stacey Abrams' name was still there, and I cast my ballot.

4. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.

- 5. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- 6. In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Further affiant sayeth not, this the 18^{th} day of November, 2018.

Signature

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

- My name is Cherry Worthy. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Fulton County in Georgia and my residence address is

East Point, Georgia

3. My individual circumstances are the following:

I cast my vote for Stacey Abrams and it automatically jumped to showing that I voted for Kemp. I tried again and it did the same thing. The same thing happened when I voted for other Democrats. It would switch from Democrat to Republican. I called a poll worker over and showed him what the machine was doing. He told me that they had already had to shut down two voting machines that were acting up. He told me to click and try again. I had to go back 2-3 times for every candidate that I was voting for to change my vote. I checked my ballot at the end and it was correct. As I was leaving, I told people in line to notice what they were doing as they voted.

4. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.

- 5. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- 6. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the <u></u>day of November, 2018.

Signature

Sworn to and subscribed before me This the 1^{5} day of November, 2018.



Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 85 of 301

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

- My name is Courtnie Danielle Fore. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Cobb County in Georgia and my residence address is

Marietta, Georgia . I am registered to vote at my residence address.

- My polling location is NEW SALEM BAPTIST CHURCH-MR4C, 836
 NEW SALEM RD NW, KENNESAW, GA, 30152.
- I made no changes to my voter registration prior to the 2018 Georgia General Election.
- 5. For the 2018 Georgia General Election, I was forced to cast a provisional ballot instead of a regular ballot or an emergency ballot at the polling place for my residence address, where I am registered.
 - a. On Election Day, November 6, 2018, my brother, my father, and I showed up to vote at New Salem Baptist Church around 7 AM. The three of us checked in with a poll worker after waiting 30-40 minutes.
 - b. As I advanced to the next stage of the check-in, the poll worker that was handling my ID card returned my card, and then handed me a yellow electronic voting card after shuffling it around.

075

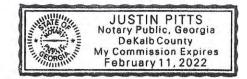
- c. I waited in another line for the voting machines, with my yellow electronic voting card in hand, for around 5 minutes until I was able to obtain a spot at a voting machine.
- d. After I inserted the yellow card into the machine, the machine displayed an error message. I brought this error message up to the attention of one of the poll workers, who suggested I try another machine. I did so, and the other machine also displayed an error message.
- e. The poll worker then took my electronic voting card and did not give me another card as I had expected. Instead, a few poll workers ended up discussing the situation, and none of them seemed to know what to do. I even heard one of the poll workers say "it seems she has already voted."
- f. Following this, I was given a provisional ballot, not an emergency ballot, and given extremely confusing, contradictory instructions on how to fill out the ballot. This ordeal also involved my name being misspelled multiple times by a poll-worker, and marks being made by poll workers on my ballot that could not be deciphered.

- **g.** In the meantime, during this experience, my brother and father, who are registered at the same address where I am registered, were able to cast regular ballots.
- h. After turning in my provisional ballot, I attempted to follow up with the Cobb County Board of Elections to make sure that it was counted. I received confusing information from the Cobb Board of Elections, and also was told that "emergency" and "provisional" ballots are the same, which I do not believe to be true.
- I expected and believe I was entitled to cast a regular ballot at New Salem Baptist Church. Instead, I was forced to cast a provisional ballot and endure poll workers who did not seem properly informed.
- **6.** I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
- 7. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- I declare under penalty of perjury that the foregoing is true and correct.
 Further affiant sayeth not, this the 17th day of November, 2018.

Courtnie Danielle Fore

Sworn to and subscribed before me This the 13 day of November, 2018.

Notary Public



Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 90 of 301

F

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

- 1. My name is Anna L. Hawkins. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Fulton County in Georgia and my residence address is Atlanta, Georgia
- 3. My individual circumstances are the following: On Election Day, my voting machine malfunctioned. The voting machine would not accept my vote and proceed to the next page when I pressed NEXT. When I told the poll volunteer about the malfunctioning machine, she pressed buttons to eject my voting card. The poll volunteer told me to vote on a different machine. I hope my vote counted.
- 4. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
- 5. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- I declare under penalty of perjury that the foregoing is true and correct.
 Further affiant sayeth not, this the <u>19</u> day of November, 2018.

bina. Ambe

Anna L. Hawkins

- My name is Mandi Herndon. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Dekalb County in Georgia and my residence address is

Decatur, GA.

- 3. I have reviewed the list below and I believe that my situation most closely fits into the category that I have checked:
 - a. ____ I requested an absentee ballot but I never received it.
 - b. _____ I received an absentee ballot and returned it but my ballot was rejected.
 - c. _____ I received an absentee ballot and returned it but my ballot was not accepted.
 - d. _____ I was not permitted to vote using a voting machine (a DRE)
 (circumstances below) and was not offered a provisional ballot even
 though I reside in the county in which the precinct was located where
 I tried to vote.
 - e. ____ I was not permitted to vote using a voting machine (a DRE)
 (circumstances below) because I was told I was not a resident of the county in which I was attempting to vote despite the fact that I had changed my address in a timely manner.

- f. _____ I was not permitted to vote using a voting machine (a DRE) (circumstances below). I asked for a provisional ballot but was told that it was too early in the day for provisional ballots or that there were not enough provisional ballots or that no provisional ballots remained.
- g. ____ I moved counties but did not change my registration address.
 When I attempted to vote in my new county, the poll workers told me to return to my old county in order to vote.
- h. _____ There were long lines at my polling location and I saw people leaving without voting.
- i. _____ There were long lines at my polling location and I had to leave without being able to cast my vote.
- **j.** _____ There were problems with the voting machines at the precinct at which I voted or attempted to vote.
- k. ____ Other please explain _____
- 4. My individual circumstances are the following: I went to vote. I was found in system and given a voter card. I inserted the card and it popped out, and the screen on the machine read "invalid card." I tried the card a second time and the same thing occurred. I brought the card to the poll worker who

looked me up again λ the system. I was told that it was recorded as if I had already voted, although I never got the chance to cast any vote. So, I received and cast a PB. I have looked on line at the MVP but did not learn if my PB counted. I have called several times, but never reached anyone and never received a call back.

- 5. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
- 6. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- 7. In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 30° day of November, 2018.

Mandi Hendo

Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 96 of 301

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

- My name is Nathaniel Lack. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Fulton County in Georgia and my residence address is

Alpharetta, GA

3. There were problems with the voting machines at the precinct at which I

voted or attempted to vote.

4. My individual circumstance is as follows:

I always vote at the AP07A Precinct at the St. James United Methodist Church in Alpharetta, Georgia. I am a regular voter and the November mid-term election was the first time I could recall in more than 23 years where I had to wait in line at this precinct to vote. I believed this was a good thing.

When I approached the voting machine I used, I noticed a handwritten "Out of Order" sign sitting next to it. It had apparently been taken down. After attempting to vote by following the instructions and touching the check boxes, I noticed that my votes were not being registered unless I continued to tap on the touch screen further and further away from the check boxes until the vote was registered on the screen.

I notified a poll worker who then told me that they were aware that this particular machine was "broken" and that you had to click in odd places along the candidate's name for the vote to be registered. They said they put the Out of Order sign on it when they knew it was not working properly but took the sign down when the lines began to form and allowed voters to use it anyway.

I presumed that my votes on this machine would be counted since they were allowing the machine to be used. However, I am not so confident because the touchscreen was obviously failing to operate as it should, failing to register votes using the check boxes for most candidates I attempted to select yet working on check boxes for most of the other election measures – suggesting to me a software problem and not merely a hardware problem. I did receive the confirmation screen which showed all of the selections I made. As a computer expert specializing in troubleshooting problems, I was very concerned but able to eventually register my vote selections. However, I assume many others using this same voting machine might have given up in frustration and merely skipped various election lines rather than continue to follow the voting instructions in vain.

This is a highly Republican voting precinct and I myself have voted more often than not in Republican primaries. In my opinion, the failure of this machine puts every vote cast on it and all other "glitchy" machines in question."

5. I give this Declaration and/or Affidavit freely, without coercion, and without

any expectation of compensation or other reward.

6. I understand that in giving this Declaration and/or Affidavit, that I am not

represented by a lawyer. Nor has any lawyer asked me to be their client or to

serve in anyway as anything other than a witness in this litigation.

7. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the $\underline{/5}$ day of November, 2018.

Signature

Sworn to and subscribed before me This the 13^{-10} day of November, 2018.

Notary Public

ł

CHRISTOPHER HARLEY NOTARY PUBLIC Fulton County State of Georgia My Comm. Expires Sept. 23, 2022

Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 98 of 301

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

- My name is David M. Maddox. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of DeKalb County in Georgia and my residence address is

Decatur, GA

- 3. I voted in-person on November 6, 2018.
- 4. When I was voting, I selected my choice for governor and saw an "X" in the box next to the candidate's name. When I finished voting and reached the "Cast Ballot" screen, I saw that no candidate appeared in my voting summary.
- 5. I called a poll worker over and she assisted me in going back and reselecting my candidate for governor. After that, the candidate for governor appeared in my summary before I hit "Cast Ballot."
- 6. I thought it was odd that, even though I saw an "X" next to the name of the candidate on the first screen, no name appeared on the summary screen until I went back and re-selected a candidate. I wonder how often this happened to other voters who may not have noticed.
- I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.

- 8. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- I declare under penalty of perjury that the foregoing is true and correct.
 Further affiant sayeth not, this the /4/^{+h} day of November, 2018.

and Michael Madda

Sworn to and subscribed before me This the $\frac{1442}{1442}$ day of November, 2018.

- My name is Sharita Mitchell. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Thomas County in Georgia and my residence address is

Thomasville, GA,

- My polling location is JERGER ELEMENTARY SCHOOL, 1006 S BROAD ST, THOMASVILLE, GA 31792.
- 4. For the 2018 Georgia General Election, I voted on a machine that was full of glitches, which made me deeply uncomfortable. The poll worker was not helpful and I am not confident that my vote was cast as I intended.
 - a. On Election Day, November 6, 2018, I showed up to vote at Jerger Elementary.
 - b. After checking in with a pollworker, I was given a ballot card and went to vote at a voting machine.
 - c. I had a lot of trouble voting on the machine.
 - d. Every time I selected a candidate and pressed the button to continue to the next screen, instead of just going to the next screen, the whole screen would glitch.

- e. It looked like the display was about to go out -- it flickered and a green and black line appeared, and then it stopped. I'm a technical person and know what a glitch looks like.
- f. It took a while to go to the next screen. Twice, when I looked back at the candidate I had selected, the screen was blank and it looked like I hadn't selected anyone. At the end of the experience, it brought up everyone who I voted for.
- **g.** Everything looked legitimate so I hit the button to cast my ballot, but then again, the screen glitched.
- h. The screen said my vote was cast but I didn't know what was going on. I let the poll worker know that every single time I tried to press continue, the screen glitched.
- i. He said that if the screen shows that your vote was cast at the end, then it worked. The poll worker asked me if I verified my candidates etc. He did not express any concern about the machine.
- j. He only wanted to make sure that everyone I voted for was on the screen before I pressed the cast ballot button, and then he moved onto the next person.
- k. I felt deeply uncomfortable about the experience.

- **5.** I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
- 6. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- 7. I declare under penalty of perjury that the foregoing is true and correct. Further affiant sayeth not, this the 22 day of December, 2018.

Shart Match 00

Sharita Mitchell

Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 103 of 301

- My name is Amy Hoover. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Fulton County, Georgia.
- 3. On November 6, 2018, I voted at The Defoor Centre, 1710 Defoor Ave., Atlanta, GA. I placed the card into the voting machine and the screen stated "error - please re-insert card." I tried re-inserting the card several times but received the same error message. I went back to the table where I received the card to request another card. The poll worker scanned my driver's license and the system showed my status as "voted." No poll workers knew how to resolve this matter. While they were trying to help me, four more voters had the same problem on the same electronic voting machine. They asked us to wait around or return in a few hours. When I returned a few hours later, the system still showed my status as "voted." The poll workers then tried what they referred to as a master controller instead of the computer tablets poll workers were using to sign in voters, and they were able to over-ride my voting status using the master controller. At that time, the poll workers said none of the other four voters had returned yet. While I was there, I observed at least five voters unsuccessfully attempt to vote after

stating they had requested but not cast absentee ballots. These voters were not allowed to vote because the precinct did not have affidavits available for the voters to sign confirming they didn't return the absentee ballots. These

Provent without casting a ballot.

- I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
- 5. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- 6. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the ______ day of November, 2018.

Amy Hooper

- 1. My name is Jeffrey Marion.
- 2. I am over eighteen years of age and competent to testify to the matters contained herein.
- 3. I reside at _____, Snellville, GA _____ and I vote in Gwinnett County.
- 4. I voted on election day. I arrived at 6:30 am at the Annistown Elementary School. The polling place was supposed to open at 7 am, but the machines were down until about 11am. So no votes were cast before 11am.
- 5. At first we were told that the license verifcation machine was broken. We waited about an hour and half. Then someone brought new power cords for the machine, but it still would not work.
- The next thing we knew, at about 10:45 or 10:50, they brought new voting cards to put in the voting machines. Voting began shortly after that.
- 7. The line to vote was wrapped around the school by the time I got to vote.
- 8. I did not vote until about 11:15 am.
- I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
- 10.I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.

Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 107 of 301

11.In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the $\underline{24}$ day of December, 2018.

Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 108 of 301

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746

- My name is Derrick Oatis. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Gwinnett County in Georgia and my residence address is

, Suwanee, GA

- **3.** I have reviewed the list below and I believe that my situation most closely fits into the category that I have checked:
 - a. _____ I requested an absentee ballot but I never received it.
 - b. _____ I received an absentee ballot and returned it but my ballot was rejected.
 - c. _____ I received an absentee ballot and returned it but my ballot was not accepted.
 - d. _____ I was not permitted to vote using a voting machine (a DRE) (circumstances below) and was not offered a provisional ballot even though I reside in the county in which the precinct was located where I tried to vote.
 - e. ____ I was not permitted to vote using a voting machine (a DRE) (circumstances below) because I was told I was not a resident of the county in which I was attempting to vote despite the fact that I had changed my address in a timely manner.

- f. _____ I was not permitted to vote using a voting machine (a DRE) (circumstances below). I asked for a provisional ballot but was told that it was too early in the day for provisional ballots or that there were not enough provisional ballots or that no provisional ballots remained.
- g. ____ I moved counties but did not change my registration address.
 When I attempted to vote in my new county, the poll workers told me to return to my old county in order to vote.
- h. _x ____ There were long lines at my polling location and I saw people leaving without voting.
- i. _____ There were long lines at my polling location and I had to leave without being able to cast my vote.
- j. ____x ___ There were problems with the voting machines at the precinct at which I voted or attempted to vote.
- k. ____ Other please explain _____
- 4. My individual circumstances are the following:

In 2016, I voted at Shadowbrook Church. I went online and discovered that my polling place had changed. I do not recall receiving any notice that my polling place had changed. I got to my polling place at 361 Main Street (Suwanee Public Library). I got there at 5 minutes to 7am. There were maybe 30-50 people already in line. About 10 minutes later, one of the poll workers came out and apologized for the delay but said that there was an issue that they were trying to correct relative to the machines. She gave no further information but that she would let us know when we could vote.

Thirty minutes later (about 7:45am) she came out and apologized and stated that none of the machines were working. The line had grown. She offered the choice of provisional ballots or for people to stay in line until the issue was resolved. She told some of the people that their provisional ballots would not be counted until the following Tuesday, not all of the people who took provisional ballots heard this announcement. I did not witness anyone who got a provisional ballot being given any type of receipt and I was not previously aware that one was required. I witnessed less than five people who accepted one.

The poll worker offered to create a list for those who decided to stay. She said that none of the machines were reading the voter cards. They sent another poll worker to Lawrenceville to get new cards in hopes that it would rectify the situation. A few people asked how long it would take. She didn't know but guessed 1.5-2.0 hours depending upon traffic. Within a matter of five minutes, of the 70+ people who were in line, about 90% of the people just left. This was so disheartening to me because I knew that many of them would not come back.

Fortunately, I had the flexibility to remain until I could cast my vote on a machine.

I also witnessed a few people who came to this polling place after being sent from another polling place where they were told that they were at the wrong place. I believe they were offered provisional ballots but I'm not certain if they took them. Both were African-American. The male was adamant that he was at the correct polling place. I'm not sure what happened for him. Eventually, I asked if there was protocol for testing the machines. The poll workers said that they test the machines but don't test the cards that go into the machines. What sense does that make? The gentleman who went to get the cards came back at 9:40am. They DID test those cards and they worked fine. I was able to vote and be in and out in less than ten minutes. The delay of 2.5 hours left several people without the chance to vote - how many, I don't know. Voting should not be this difficult under any circumstances. Eligible voters should be able to vote under the simplest terms possible.

- **5.** I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
- 6. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.

7. In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 20 day of December, 2018.

Dunil D. Oatis Signature

Case 1:17-cv-02989-AT Document 412 Filed 06/19/19 Page 113 of 301

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

- My name is Kimberly Williams. I am over eighteen years of age and competent to testify to the matters contained herein.
- 2. I am a resident of Fulton County in Georgia. My residence address is

, Atlanta, GA

- I have reviewed the list below and I believe that my situation most closely fits into the category that I have checked:
 - a. ____ I requested an absentee ballot but I never received it.
 - b. _____ I received an absentee ballot and returned it but my ballot was rejected.
 - c. _____ I received an absentee ballot and returned it but my ballot was not accepted.
 - d. _____ I was not permitted to vote using a voting machine (a DRE)
 (circumstances below) and was not offered a provisional ballot even
 though I reside in the county in which the precinct was located where
 I tried to vote.
 - e. ____ I was not permitted to vote using a voting machine (a DRE) (circumstances below) because I was told I was not a resident of the

county in which I was attempting to vote despite the fact that I had changed my address in a timely manner.

- f. _____ I was not permitted to vote using a voting machine (a DRE) (circumstances below). I asked for a provisional ballot but was told that it was too early in the day for provisional ballots or that there were not enough provisional ballots or that no provisional ballots remained.
- g. ____ I moved counties but did not change my registration address.
 When I attempted to vote in my new county, the poll workers told me to return to my old county in order to vote.
- h. _____ There were long lines at my polling location and I saw people leaving without voting.
- There were long lines at my polling location and I had to leave without being able to cast my vote.
- **x** There were problems with the voting machines at the precinct at which I voted or attempted to vote.
- k. ____ Other please explain -_____

4. My individual circumstances are the following:

It was important for me to vote in this election. I have been voting for years, and I have never previously had a problem. I took my friend, Bernard Demod Leverette, to vote on election day. This was his first time voting. Mr. Leverette is visually impaired, so I was there to help him vote and to vote for myself. We went to vote at South Atlanta High School.

I first helped Mr. Leverette before voting for myself. I read him all of the questions and entered in the responses that he told me. When we were done, the machine ejected the yellow voting card really quickly, but at the bottom of the screen, it said that the vote had not been recorded. I was confused by this because there was no apparent reason for the vote not to be recorded.

I decided to try my own voter card. I made all of my selections and when I got to the end, the same thing happened: the machine ejected the yellow card really quickly but stated that my vote had not been recorded.

I went back to the front and told the people at the polling place what had happened. They gave me two new voting cards. We went through the same process, and this time, it did not say that the votes had not been recorded.

While there was no obvious sign that our votes had not been recorded, I am still worried that our votes were not counted because of what happened with the first voter cards. I am also worried that other people may not have noticed that the screen said that the vote had not been recorded, especially

102

because it ejected the yellow card so quickly. I am worried that people left without realizing that their votes had not been recorded.

- 5. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
- 6. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- 7. I declare under penalty of perjury that the foregoing is true and correct. Further affiant sayeth not, this the 5 day of November, 2018.

Kinberly Williams



Notary Public

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746 AND/OR SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW

1. My name is Jeffery Young. I am over eighteen years of age and competent

to testify to the matters contained herein.

2. I am a resident of Gwinnett County in Georgia and my residence address is

Snellville, Georgia,

- 3. My individual circumstances are the following:
 - a. On election day my polling place, Annistown Elementary, had six voting machines. I arrived at 8:45 am to vote and there were about 125 people or more in line.
 - b. While in line I heard that the machines were down, and that no one had voted yet. At that time, they were bringing in two more machines but those ended up not working either.
 - c. Later we were told that the issue wasn't with the machines, but was instead with the cards. A representative from the board of elections was there and said they sent someone to get new cards.
 - d. The representative at the polling location made an announcement that people could fill out provisional paper ballots. About 60 people chose to fill out provisional ballots.
 - e. I was able to vote at 12:49 pm.
- **4.** I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.

- 5. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
- 6. I declare under penalty of perjury that the foregoing is true and correct. Further affiant sayeth not, this the 13^{44} day of November, 2018.

Sworn to and subscribed before me This the _____ day of November, 2018.

Notary Public

DECLARATION UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746

- 1. My name is Uranius Young.
- I am over eighteen years of age and competent to testify to the matters contained herein.
- 3. I reside at Douglasville, GA
- 4. I voted in early voting at the Boundary Waters center in Douglasville, GA.
- 5. When I tried to vote, the card that they gave me was not accepted at the machine. The people working at the polling place tried the card about 6 times and on various machines. Finally, the card worked and I was able to vote.
- 6. I did witness others having issues being able to vote. A lady kept being told that they couldn't find her and she kept saying how she had been voting for many years at that exact location. I never did she her get to cast her ballot.
- I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
- 8. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.

9. In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 13 day of December, 2018.

ignature