

# EXHIBIT F

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

DONNA CURLING, ET AL.,

Plaintiff,

vs.

BRAD RAFFENSPERGER, ET  
AL.,

Defendant.

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: Civil Action No.: 1:17-cv-2989-AT  
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**DECLARATION OF CHATHAM COUNTY ELECTIONS SUPERVISOR,  
RUSSELL BRIDGES**

I, Russell Bridges, declare as follows:

1. I am over the age of majority, of sound mind, and otherwise qualified to make this Declaration based upon my own personal knowledge. This Declaration is offered pursuant to 28 U.S.C. § 1746 in support of State Defendants' Response in Opposition to Plaintiffs' Motion for Preliminary Injunction (Defendant's "Motion").

2. I am the Elections Supervisor for Chatham County, Georgia. I have held this role since May 10, 2004. Prior to becoming Supervisor of Elections, I was an IT (Information Technology) professional for 36 years. My experience included operations, program development, systems design, systems configuration and

installation, communications, networking, security and support in the public sector, and in the private sector in manufacturing, banking and with a major computer manufacturer.

3. The Chatham County Board of Elections (the “Chatham Board”) conducts elections for all eight municipalities located within Chatham County. The following cities located in Chatham County will conduct scheduled elections on November 5, 2019: Garden City, Pooler, Port Wentworth, Savannah, Tybee Island, and Vernonburg. The remaining two municipalities, Bloomingdale and Thunderbolt, do not have elections scheduled for 2019.

4. The Chatham Board will also be conducting a SPLOST referendum for Chatham County on November 5, 2019. Additional elections may still be added to November 5, 2019 in accordance with Georgia law.

5. Chatham County has 207,000 active registered voters in the county. For the November 5, 2019 elections, the Chatham Board intends to utilize 90 voting precincts throughout the county. The Chatham Board is also exploring the feasibility of utilizing two additional precincts.

6. The Chatham County Board of Registrars conducts the absentee functions in the county, including both absentee by mail and in-person advanced-voting. The Chatham Board prepares and provides all equipment and ballots

utilized during these functions and provides support to the Registrar. The Registrar historically has five advanced voting locations and intends to open a new sixth location for the November 2019 election.

7. In advance of any election, myself and staff at the Chatham Board spend weeks preparing equipment for the election. This includes determining distribution and securely transporting election equipment, proofing ballots, and other time-consuming responsibilities. Additionally, the Chatham Board plans to deploy approximately 600 poll workers throughout the county for this election, most of whom have previously been trained in our current elections process.

8. For the November 5, 2019 elections, the Chatham Board will deploy and voters will utilize Direct Record Electronic Voting Machines (“DREs”) for early in-person absentee and election-day voting, in accordance with Georgia law. The Chatham Board will also utilize the Global Election Management System (“GEMS”) Database for the November 5, 2019 elections.

9. The current voting system has been in place since 2003 and has been utilized for 52 elections in Chatham County, of which 50 have occurred during my tenure. During my time supervising DRE elections in Chatham County, there has not been one time where a vote on a DRE was lost or the integrity of results of an election in Chatham County were called into question. The only vote variance that

has occurred during my time as Elections Supervisor occurred in a recount where there was a one-vote difference between the hand-marked paper absentee ballots that were scanned during the recount and the election-day vote total. In that instance, the number of hand-marked paper absentee ballots scanned remained equal for both the election and the recount but the vote total for one race changed by one.

10. If the cities located in Chatham County and/or the County itself are subject to a Court Order to institute either: (A) an entirely new paper ballot voting system using optical scanners for tabulation along with Ballot Marking Devices (“BMDs”) and a replacement for the GEMS Database; or (B) a paper ballot voting system using the GEMS database and AccuVote Optical Scanners as well as electronic machines for disabled voters; such a transition would be costly, difficult to implement prior to November, and could cause greater confusion than any issues currently presented by the DRE voting system.

11. The Chatham Board currently owns eight (8) AccuVote Optical Scanners. The Chatham Board also owns two (2) Ballot on Demand printers. This equipment is used to print and count absentee and provisional ballots. Because we can potentially have 146 different ballots in a given election, a minimum of five scanners is required to handle these variations for tabulating absentee and

provisional ballots. When tabulating provisional and absentee ballots, the ballots are segregated into five groups based on precinct with each group using a single scanner.

12. If either proposed system is imposed upon Chatham County or its cities, the Chatham Board would likely be left with a choice to either void its agreement with the city due to the intervening effect of an order requiring the county utilize an expensive process it is unfamiliar with, or seek additional funding for a new system. If the former, the Cities of Garden City, Pooler, Port Wentworth, Savannah, Tybee Island, and Vernonburg would presumably be left to not only fund their own election, but also conduct it, which they do not have experience with. If the latter, the Chatham Board would need to request funding from the County Commission which may have other priorities and needs for limited monetary resources.

13. If we were required to institute an entirely new paper ballot voting system using different optical scanners for tabulation along with Ballot Marking Devices (“BMDs”) for disabled voters and a replacement for the GEMS Database, significant time, money, and training would be required. First, we would need to determine the number of new optical scan units required for this election and

comply with any local or state procurement laws, fund the purchase of those units with county funds, and train poll workers on the use of this new process.

14. Assuming the hypothetical new optical scan system operates with similar efficiency and speed as the AccuVote Optical Scanners currently in use, I estimate we would need approximately 130-140 scanners to account for the anticipated turnout and necessary back-up devices to facilitate precinct and early vote center scanning, without causing inordinately long lines on election day. Similarly, under this proposed scenario, the Chatham Board would need at least one BMD in each precinct of the County's 90–92 precincts and six early voting locations in addition to several back-up devices. The Brennan Center for Justice recently estimated the cost of these machines at approximately \$5,000 per item.<sup>1</sup> Assuming the Chatham Board could obtain a similar price point without having the scale of an entire state, I roughly estimate that the County's cost for only required election equipment could exceed \$950,000 to comply with this system for one election. I further estimate that the Chatham Board would need to prepare approximately 125–135,000 ballots for these elections. Based on the current cost of printing on our Ballot on Demand printers, at approximately fifty (50) cents per ballot, I estimate the cost of printing alone could easily exceed \$60,000. This

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<sup>1</sup>Available at [https://www.brennancenter.org/sites/default/files/analysis/New\\_Machines\\_Cost\\_Across\\_Paperless\\_Jurisdictions%20%282%29.pdf](https://www.brennancenter.org/sites/default/files/analysis/New_Machines_Cost_Across_Paperless_Jurisdictions%20%282%29.pdf).

estimate could increase as the Chatham Board would likely need to obtain additional Ballot on Demand printers in order to print such a large number of ballots on time while also preparing a sufficient number of absentee ballots or would otherwise need to contract with a ballot printing firm to provide the bulk ballots. I lack sufficient knowledge as to the cost and appropriate replacement of the GEMS database.

15. If we were required to institute a paper ballot voting system using the GEMS database and AccuVote Optical Scanners as well as electronic machines for disabled voters similar additional resources would be required. As previously mentioned, I estimate we would need to procure 130–140 additional AccuVote Optical Scanners. We would also need to procure 600 privacy stations for voters to use when marking their ballots. Additionally, paper ballots using optical scan machines take significantly longer to count and tabulate than the current system, particularly if central scanning is utilized. I estimate, based on the information contained in this declaration, that the cost of the election equipment needed under this scenario could exceed \$500,000.

16. Under either scenario, if imposed upon the Board, additional funding would be required in order to effectively implement the change. The Chatham County Board of Commissioners just adopted the new budget for Fiscal Year 2020,



which went into effect July 1, 2019 and no funds were included for a new or replacement system. The entire budget for the Chatham County Board of Elections in the FY 2020 budget is approximately \$1,073,000, including personnel expenses. Finding an additional \$500,000–950,000 for these anticipated one-time expenses would require a request to the Board of Commissioners for additional county funds.

17. Under either scenario, if imposed upon the Board, a significant amount of additional training would be required for myself, full-time staff at the Chatham Board, and the 600 poll workers needed to conduct elections in November 2019. This additional training would also have to be conducted within a compressed timeframe and possibly by utilizing only the Chatham Board's resources. Unlike with the current system, where training and certification sessions are provided by the Georgia Association of Election Officials, the Voter Registrars Association of Georgia, and the Secretary of State, it is unclear whether those entities would be prepared to provide sufficient training before the November 5, 2019 municipal elections and advanced in-person and absentee-by-mail voting beginning October 15, 2019. Absent significant help in training and implementation from the state, and likely even with that help, the Chatham Board

would have difficulty implementing a new system on such a compressed timeframe.

18. Absentee voting functions begin October 15 and the Board's preparations for both mail-in absentee and in-person early absentee voting must be completed early enough to ensure availability of adequate ballots and machine preparation. The changes contemplated under either scenario, occurring after July 26, 2019 would provide about 40 working days to acquire new equipment, learn how to utilize and deploy it, develop training material, train over 600 workers, and provide adequate public outreach to alert the public of the new voting process. It would also be difficult to hire additional poll workers, poll workers are already difficult to recruit and hiring inexperienced workers simply to have more workers on hand will not effectively ameliorate these concerns. In sum, setting fiscal concerns aside, a change of this magnitude in the timeframe contemplated would be practically difficult and nearly impossible to achieve without significant staffing, training, and outreach complications.

19. I also anticipate that the State will purchase new voting machines soon and will require implementation pursuant to House Bill 316. It is my personal knowledge that the State has been evaluating and preparing to implement a new voting system for nearly two years now. This implementation will take time and

resources from my staff and could be substantially impeded by the introduction of a new system and required training on that system for only the November 2019 elections. Similarly, implementing an interim system in a short period of time as described would, based on my personal knowledge and experience, likely cause significant voter confusion particularly in light of the new system planned for implementation in 2020.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 9th day of July, 2019.

A handwritten signature in cursive script, reading "Russell Bridges", written over a horizontal line.

RUSSELL BRIDGES

*Elections Supervisor,*

*Chatham County Board of Elections*