

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

<b>DONNA CURLING, ET AL.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	<b>CIVIL ACTION</b>
<b>vs.</b>	)	
	)	<b>FILE NO. 1:17-cv-2989-AT</b>
<b>BRAD RAFFENSPERGER, ET AL.,</b>	)	
	)	
<b>Defendants.</b>	)	

**COALITION PLAINTIFFS’ NOTICE OF FILING EVIDENCE**

**PART TWO**

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

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 19<sup>th</sup> 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*

/s/ Cary Ichter

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 19<sup>th</sup> day of June, 2019.

/s/ Bruce P. Brown  
Bruce P. Brown

E  
X  
H  
I  
B  
I  
T  
  
A

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

<b>DONNA CURLING, ET AL.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	<b>CIVIL ACTION</b>
<b>vs.</b>	)	
	)	<b>FILE NO. 1:17-cv-2989-AT</b>
<b>BRAD RAFFENSPERGER, ET AL.,</b>	)	
	)	
<b>Defendants.</b>	)	

**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

**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 Carolyn E. Stephens. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I served as a Poll Watcher for the Democratic Party of Georgia on November 6, 2018.
3. The following are issues I observed when I was at the Cedar Shoals High School Polling Location:
  - a. Voter One moved to Athens in 2017. He went to the Division of Motor Vehicles tag office on Lexington, Road and changed his voter registration on around March of 2017, so he could vote in Athens. On November 5, 2018 the night before the general election, he checked the Athens-Clarke Board of Elections website. It confirmed that he was registered to vote at Cedar Shoals High School polling station. On November 6, 2018 at the polling station, he was told that he could not vote at Cedar Shoals. When the poll manager called the Board of Elections, she told him that he would have to go to Lawrenceville (a one-hour drive), where he used to live, in order to vote. Because he had been given time off from work to vote, he had to return immediately to work without voting. He took a registration form and

said he would have to come back to complete a provisional ballot. I do not know if he returned to vote.

- b. Voter Two registered to vote before the registration deadline and more than a month before Election Day. He received no notice of any problem with his registration. When he arrived to vote, he found that he was not listed on any voter rolls. He was unable to vote because the poll manager could not get advice from a Board of Elections person because no one answered her phone call. The poll manager asked Voter Two to return at 2:00 p.m., by which time she thought she would have been able to reach her supervisor who could tell her how to advise him. He said he would return.
- c. Voter Three mailed in her voter registration with her current and correct address in Athens in September of 2018. She said she mailed it directly from a U.S. Post Office to make sure it was correctly posted. She knew registration closed in October. When she was at the Cedar Shoals High School voting station on November 6, she was told that she was registered to vote only in Milledgeville (her former home two hours from Athens). She was not offered a provisional ballot. At first, she indicated that she would drive to Milledgeville, but before she left, she said that she was unlikely to be able to drive the 4 hours it



said he would have to come back to complete a provisional ballot. I do not know if he returned to vote.

- b. Voter Two registered to vote before the registration deadline and more than a month before Election Day. He received no notice of any problem with his registration. When he arrived to vote, he found that he was not listed on any voter rolls. He was unable to vote because the poll manager could not get advice from a Board of Elections person because no one answered her phone call. The poll manager asked Voter Two to return at 2:00 p.m., by which time she thought she would have been able to reach her supervisor who could tell her how to advise him. He said he would return.
- c. Voter Three mailed in her voter registration with her current and correct address in Athens in September of 2018. She said she mailed it directly from a U.S. Post Office to make sure it was correctly posted. She knew registration closed in October. When she was at the Cedar Shoals High School voting station on November 6, she was told that she was registered to vote only in Milledgeville (her former home two hours from Athens). She was not offered a provisional ballot. At first, she indicated that she would drive to Milledgeville, but before she left, she said that she was unlikely to be able to drive the 4 hours it

would require to vote. She did not vote. Her brother, who lives at her same address, is listed as Voter Four below. He was initially prevented from voting on Election Day.

- d. Voter Four (the brother of Voter Three) had changed his voter registration to reflect his Athens address. When he attempted to vote at Cedar Shoals High School on Election Day, he was initially unable to do so. The poll manager called the Board of Elections who also talked with Voter Four. They told him that someone had entered his name into the system incorrectly (I think originally someone told him it didn't match his social security number). He was able to correct this mistake on the phone and he voted at Cedar Shoals after the phone conversation.
- e. Voter Five said she was purged from the voter roll because she missed at least one electoral cycle. The voter had to leave to get to a doctor's appointment on time. The poll manager asked her to return at 2:00 p.m. when she could complete a provisional ballot. I do not think she returned.
- f. Voter Six arrived at the Cedar Shoals High School polling location at 7:13 p.m. He told the poll manager that a person (name was stated) from the Board of Elections told him to get to Cedar Shoals High

School by 7:30 and complete a provisional ballot. When I spoke with him, I learned that Voter Six had registered to vote two to three days before the registration deadline ended. A man offered to register him at the Athens Neighborhood Health Center near where Voter Six works as a security guard. On election day, he was surprised to find that he was not registered. He said he was frustrated and angry and raised his voice when speaking with someone at the Board of Elections. He insisted on being allowed to vote. The person told him to complete a provisional ballot at Cedar Shoals High School. He said he called the emergency voter number, among others, in order to vote. He completed a provisional ballot.

- g. Voter Seven moved to Athens, GA and voted at a Clarke County voting station in 2016. At 6:45 p.m. she was told at the Cedar Shoals High School polling location that she was supposed to be in Crawford, Georgia to vote. She said she had not lived in Crawford for the past two years. The poll manager asked her to talk with someone from the Board of Elections. Voter Seven told the Board of elections representative that she had voted in Athens in 2016 and did not understand the reason she could not vote there on election day. The person acknowledged to Voter Seven that they had the record in their

system of her voting in Athens in 2016. They told her that when she went to the DMV on December 28, 2017, Oglethorpe County had “pulled you back in”. Voter Seven told the poll workers that she had registered at the DMV on November 28, 2017 not December 28.

Voter Seven told me she was concerned not only with the fact that they had an incorrect address in her registration but that they had the incorrect date on which she registered. She was not told that she could complete a provisional ballot. It was 6:45 and polls were closing at 7:00. I suggested she complete a provisional ballot even if it did not count after someone had a chance to review her dispute about registration. Voter Seven completed a provisional ballot at 6:55 p.m. on election day.

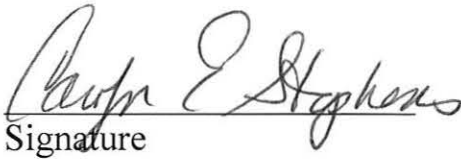
- h. I observed multiple people leave without voting throughout the day because of varied problems. Six of the seven voters that thought they were correctly registered to vote were African-Americans. The person who was not African-American voted after 7:00 p.m. Most of the voters with issues were not offered provisional ballots. I did not understand why people who claimed they had correctly registered as citizens of Athens-Clarke County were not advised to record their

votes on provisional ballots in case the registration errors were later assessed as County rather than voter mistakes.

- i. Voters with whom I spoke to told me that they were being directed to drive 30 minutes, one hour, or two hours to another county to vote. As far as I could determine, provisional ballots were not being offered as alternatives to driving long distances when they believed they had registered correctly to vote where they live.
  - j. On the morning of the election, I reported that people were registering to vote when they were getting their driver's licenses from the Athens-Clarke County DMV. I realized during the day that they were describing the DMV county tag office on Lexington Road as the place where they registered to vote, not the driver's license office as I had originally reported. Multiple voters told me that their voter registrations were filed from the DMV office. A long-time poll worker told me that registering people to vote from the DMV office had resulted in voters with previous, rather than current addresses for voter registration. According to this poll-worker, this had been an on-going problem that they had been unable to stop.
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 day of November, 2018.

  
Signature

Sworn to and subscribed before me  
This the 13<sup>th</sup> day of November, 2018.

  
\_\_\_\_\_  
Notary Public

**Carla Braswell**  
Notary Public, State of Georgia  
Clarke County  
My Commission Expires 02/11/2022

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

My name is Ayesha Terry. I am over eighteen years of age and competent to testify to the matters contained herein.

1. I am a resident of Henry County in Georgia and my residence address is \_\_\_\_\_ **██████████** Stockbridge Ga. **██████████** \_\_\_\_\_.
2. 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.   **x**   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 - \_\_\_\_\_  
\_\_\_\_\_

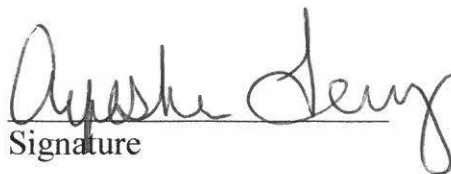
3. My individual circumstances are the following:



I was unable to vote in the mid-term election. I attempted to vote a First Baptist Church in Henry County. This is where I voted for the 2016 Presidential election. When I went to the polls on election day, I was told that my name was not showing up in the system and that I hadn't voted in 8 years. They told me that I had to re-register. They pulled up an old address in Macon and I did not vote during the time I lived in Macon. They did not offer me a provisional ballot and I was unable to vote. There was a long line of people who were not able to vote. I know, for a fact, that the reason I was given for not being able to vote was untrue.

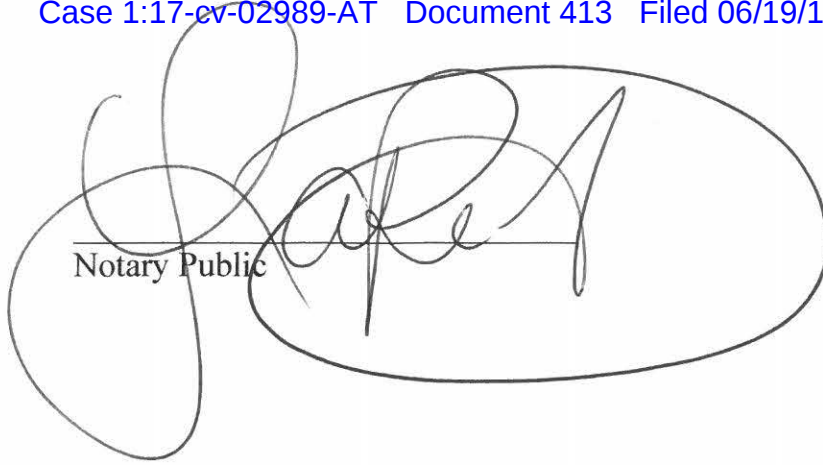
4. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
5. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway 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   12   day of November, 2018.

  
Signature

Sworn to and subscribed before me  
This the 16th day of November, 2018.



A handwritten signature in cursive script is written over a horizontal line. Below the line, the words "Notary Public" are printed. The signature and the line are enclosed within a large, hand-drawn oval.

Notary Public

W-00276932

## Certificate of Appointment of Notary Public

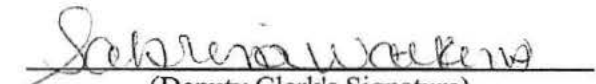
Georgia, RICHMOND County

I, **ELAINE C. JOHNSON**, Clerk of Superior Court in and for said County, hereby certify that **WAYNE FRAZIER**, whose address is [REDACTED] **HEPHZIBAH, GA**  
[REDACTED]


Age: **62**, Sex: **MALE**, was duly appointed and sworn in as a Notary Public under the provision of O.C.G.A. Title 45, Ch. 17, Art. 1 as Amended, that their term of office begins on the **15th day of March, 2016**, and expires on the **14th day of March, 2020**.



WITNESS my hand and seal of said Court this  
17th day of March, 2016

  
(Deputy Clerk's Signature)

Deputy Clerk of Superior Court  
RICHMOND County, Georgia

  
(Notary's Signature)

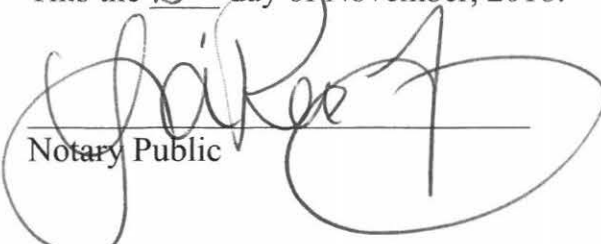
**DECLARATION UNDER PENALTY OF PERJURY  
PURSUANT TO 28 U.S.C. § 1746  
AND/OR  
SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW**

1. My name is Diondra Thurman-Jetter. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of Clayton County in Georgia and my residence address is [REDACTED] Riverdale, Georgia, [REDACTED]
3. I traveled to my precinct, but they told me I was not registered. I had registered online, and the address online matched my driver's license.
4. I was told I had to fill out a provisional ballot and I did.
5. I was not given any information or documentation on how to check whether my provisional ballot counted in the current election.
6. The woman that discussed the provisional ballot with me did not seem to understand how it would work.
7. I had voted at the same precinct with no issues since 2012.
8. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
9. 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.
10. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 15<sup>th</sup> day of November, 2018.

  
Signature

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

  
Notary Public

4826-8345-6379, v. 1



**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 Dana Van Zajac. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of Cherokee County in Georgia and my residence address is [REDACTED], Woodstock, GA, [REDACTED]
3. I served as a poll watcher on November 6, 2018 at the polling location at Liberty Elementary School in Cherokee County. This was, I believe, one of the largest Cherokee County polling locations with in excess of 2000 voters casting their ballots throughout the day.
4. One of most troubling things that I observed was spouses coming to vote together after having changed their addresses through the Department of Motor Vehicles. They had changed their residence addresses and checked the box to update their voter registration as well. When they tried to vote, at least three couples learned that one spouse's address had been correctly updated while the other spouse's address showed as the former address in the registration system. All of them had drivers' licenses that reflected their new address.

5. In each instance, the spouse with the unchanged address was directed to return to the original location to cast their ballot. I do not believe that they cast provisional ballots at the Liberty precinct.
6. There was a BOE employee (Jonathan) on site because of problems with the voting machines. One of the machines was taken off line because he could not recalibrate it. Until at least noon, almost all of the machines were operating on battery power because one of the machines kept “popping a fuse.” They had to keep resetting the machine and it kept the remaining machines from charging.
7. I spoke to “Jonathan” about the provisional ballot issues. He told me that they preferred, strongly, that voters return to their original voting site even though they were entitled to vote provisionally.
8. In fact, I observed one voter who came in requesting a provisional ballot because she did not have time to get to her assigned location. The poll workers had her get on the phone with the Board of Elections and she was questioned, extensively, about why and whether she could get back to the assigned precinct. Ultimately, after an extended period of time, she was given a provisional ballot and allowed to vote.
9. I did observe one woman, who came very close to the closing time, who I believe was properly registered in Cherokee County but not assigned to the

Liberty precinct. She was going to be allowed to vote a provisional ballot and stood in line to do so. Unfortunately, there were a number of people in line and, after waiting in line for at least 20 or 25 minutes, she had to leave without voting because she had family waiting. Her husband was able to vote at the Liberty location but her address had not appropriately updated.

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

11. 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.

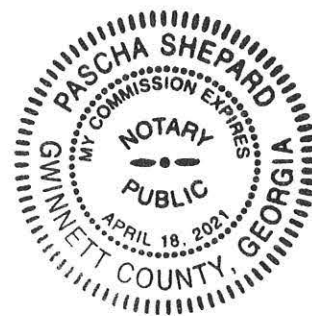
12. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 11<sup>th</sup> day of November, 2018.

  
\_\_\_\_\_  
Dana Van Zajac

Sworn to and subscribed before me  
This the 11<sup>th</sup> day of November, 2018.

  
\_\_\_\_\_  
Notary Public



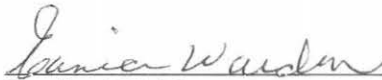


**DECLARATION UNDER PENALTY OF PERJURY  
PURSUANT TO 28 U.S.C. § 1746  
AND/OR  
SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW**


1. My name is Eunice Walden. 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  
[REDACTED] Lithonia, GA [REDACTED]
3. I have voted at the polling location associated with my residence address, Miller Grove High School, for the past three years, after I moved to my residence from Macon, GA.
4. For the 2018 Georgia General Election, I disallowed from voting at the polling place for my residence address, where I have been voting for the past three years.
  - a. On Election Day, November 6, 2018, I showed up to vote at Miller Grove High School around 4pm and someone took my ID and told me I was not on the list to vote.
  - b. I was surprised because I moved to my current address 3 years ago from Macon, GA and when I moved I switched my voter registration to DeKalb County. I also switched the registration of my daughter and my son.

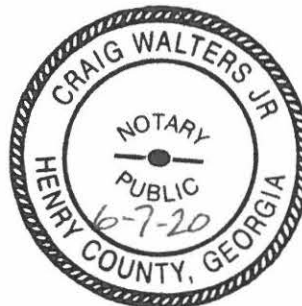
- c. When I went to vote they had my family member's name on the list and not mine. They said I could not vote because they sent notice to Macon, GA to verify who I am and they never received anything back so they said I was not active.
  - d. I asked why they sent it to Macon when I have an address in Lithonia and they did not answer. I then asked if I could use a provisional ballot and she replied that if I used a provisional ballot it would only be thrown out so I left without being able to vote at all.
  - e. I have voted in Dekalb County since living here the past 3 years. I was prevented from voting this year, and they didn't even let me cast a provisional ballot. I am upset that I was unable to vote.
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.

  
Eunice Walden

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

  
\_\_\_\_\_  
Notary Public



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

1. My name is Talisha Warren. 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:

a. In 2016 I registered to vote and my polling location was "Anderson Living." *Livsey TW* At a later point, I received a letter notification that my new

polling location was "Annistown Baptist." I then received a second

letter stating that my polling location was switched back to "Anderson ~~Anderson~~ *Ann Anderson*

Living." *Livsey TW*

b. A few days before Election Day I received a 3<sup>rd</sup> and final letter that my polling location would be at "Lenora Church." On Election Day in 2016, I ended up voting at Lenora Church. Between the presidential and this election, I did not receive a notice that the polling location changed.

c. On Election Day this year, I went to "Lenora Church" and I stood in line for 2 hours to vote. When I got to the front the elections officials

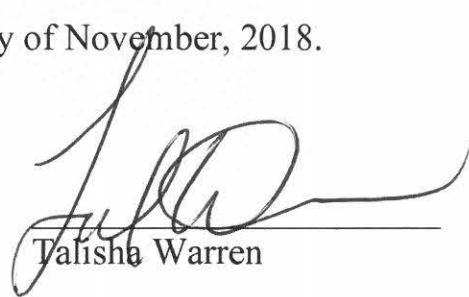
scanned my ID and I was told I needed to vote at "Anderson Living." *Livsey TW*

Elementary School." I explained that I voted at this location in 2016

and that I have a special needs daughter and I cannot go to the other polling location, especially not after waiting 2 hours.

- d.** After requesting a provisional ballot, they allowed me to vote provisionally.
- 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 day of November, 2018.



Talisha Warren

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

1. My name is Carlos White. 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  
██████████ Rex, Georgia ██████████
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.   X   Other – See below.

4. My individual circumstances are the following: I am a resident in Clayton County and have resided there for the last 3 years. Even though I have been able to vote in Clayton County in previous elections with no trouble whatsoever, this year I was told there was a problem with my registration. When I went to the polling place on election day, my county of residence

had been switched somehow to my old address in Gwinnett County. The poll worker allowed me to vote with a provisional ballot, but as of today's date, I still have not been able to confirm my registration with Clayton County and feel that my vote was most likely not counted.

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 18<sup>th</sup> day of November, 2018.



Carlos White

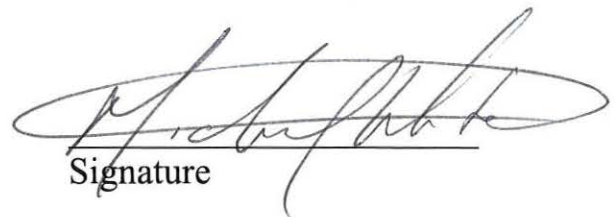


**DECLARATION UNDER PENALTY OF PERJURY  
PURSUANT TO 28 U.S.C. § 1746  
AND/OR  
SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW**

1. My name is Michael White. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of Cobb County and my address is [REDACTED] Powder Springs, GA, [REDACTED]
3. My polling location was at the George Ford Center, 4181 Atlanta St., Powder Springs, GA.
4. My individual circumstances are the following:
  - a. I voted in Cobb County in 2016. When I searched for my information on the Secretary of State's (SOS) My Voter Page (MVP) I could not find my registration in Cobb County.
  - b. I called the SOS and was transferred to the Cobb Board of Elections and they told me I was registered in Fulton County. I told them I had never lived in Fulton County. The woman on the phone found that it was a mistake on Fulton County's part because of my address-- it's in Powder Springs but the lines have it pulled for Fulton County.
  - c. The woman on the phone told me to vote with a provisional ballot and that she would have everything in her office so that it would not show that I was voting at two locations.

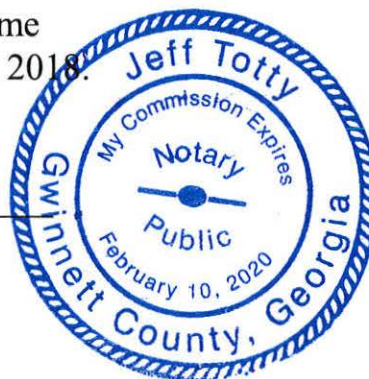
- d. I went on Tuesday to the George Ford Center and voted with a provisional ballot. I was told that I should call the Voter Protection Hotline number and the Cobb Board of Elections (BOE) to confirm my vote counted.
  - e. Cobb BOE employees said that officials had not gotten to count the paper ballots on Friday and that they wouldnt be done unitl Monday. I asked how they would do that if Monday was a holiday and they hung up on me.
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 14<sup>th</sup> day of November, 2018.

  
Signature

Sworn to and subscribed before me  
This the 14<sup>th</sup> day of November, 2018.

  
Notary Public



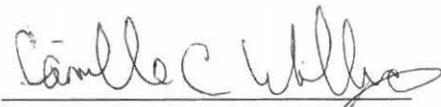
Notary Public

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

1. My name is Camille Christina Williams. 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 [REDACTED]  
[REDACTED], ATLANTA, GA, [REDACTED]
3. I was not allowed to cast a regular ballot at my registered polling place.
4. I am registered to vote in Georgia at my aforementioned residence address. My polling place, as listed on the Georgia Secretary of State's "My Voter Page," is 'Precinct VG01 VININGS LIBRARY-VG01, 4290 PACES FERRY RD, ATLANTA, GA, 30339 – 0000.'
5. I verified my polling place on the Secretary of State's "My Voter Page" before arriving at the Vinings Library on 7:15 AM on Election Day, November 6, 2018.
6. After waiting in line for a total of 150 minutes, at 9:45 AM I spoke to a poll worker who told me that according to their information, I was not registered to vote at my current address, and was instead registered to vote at my previous address in Kennesaw, GA.
7. I was told by the poll worker that I would not be allowed to cast a regular ballot at the Vinings Library precinct, and would only be allowed to cast a provisional ballot unless I traveled to my previous polling location.

8. I ended up casting a provisional ballot at the Vinings Library.
9. 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.
11. I declare under penalty of perjury that the foregoing is true and correct.

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

  
Camille Christina Williams

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

1. My name is Mariah Wolfe. 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 [REDACTED]  
[REDACTED] Atlanta, GA [REDACTED] I am a student at Spelman College.
3. For the 2018 Georgia General Election, I registered to vote well ahead of time, showed up at multiple Fulton County polling locations, and was still forced to cast a provisional ballot. I do not believe that my ballot was counted.
  - a. I am a first-year student at Spelman College, who moved to Spelman from out of state to attend.
  - b. Voting is very important to me; I was registered to vote before moving to Georgia, and I wanted to make sure I was registered in Georgia to vote in a historic election.
  - c. During the first few weeks of school of the Fall Semester, Spelman College held a voter registration drive for its students. During this drive, I registered to vote using a program called Turbo Vote.

- d.** When I registered to vote, I distinctly remember seeing a confirmation screen, which indicated that I submitted my registration information and that I was good to go.
- e.** Between registering to vote and Election Day, I received general mail from Turbo Vote, which further made me believe that I had done what I had needed to register to vote as a Spelman College student and cast my ballot come Election Day.
- f.** On Election Day, I not only had classes to attend at school, but I also was scheduled to work at my place of employment.
- g.** Still, because voting is important to me, I carved out the time to show up around 4 PM to the polling place associated with students of the AUC Consortium, Archer Hall at Morehouse College.
- h.** The situation at the polling location was chaotic. Multiple long lines were readily visible, with varying instructions given by poll workers on who should be in which line.
- i.** Eventually, I was told to look up some information on my phone regarding my voter registration. The information did not come up, and I was told that I may not be able to vote at Morehouse.
- j.** I had no idea what to do at that point. Another person at the polling location told me to call a Voter Protection Hotline to find out what

was going on. I called the Hotline and the person I spoke to told me I needed to go to a different precinct, at Booker T. Washington High School, in order to vote.

- k.** At this point, I was very frustrated, but still committed to vote. A volunteer at Morehouse was willing to drive me to Booker T. Washington High School, so I decided to go in order to cast my ballot.
- l.** After we arrived at Booker T. Washington High School, the first thing I noticed was that the lines were very long. I got in line, and once I got to the front, the poll worker told me that I was not registered to vote and that I needed to cast a provisional ballot.
- m.** The time at this point was a little too close to 6 PM, which was the time I needed to report to my workplace.
- n.** I decided to stay anyway, until 6:30 PM, and cast a provisional ballot, despite the fact that I was already late for work and had spent multiple hours attempting to vote on a busy day for me.
- o.** I received an orange slip of paper after filling out my provisional ballot with instructions on how to follow up on the ballot. But after already expending so much time in the middle of a busy schedule that included classes and work, I did not have time to follow up on my provisional ballot.



- p.** I am deeply frustrated that my vote does not seem to have been counted for the 2018 Georgia General Election. I registered to vote, I spent multiple hours trying to vote, and still was not allowed to cast a regular ballot.
- q.** Many students at my school told me that they also were not able to vote on Election Day. I hope someone fixes this broken system that is taking the right to vote away from so many people.
- 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.

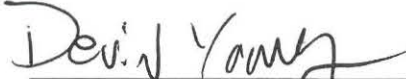
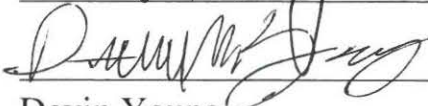
Further affiant sayeth not, this the 14 day of February, 2019.

  
Signature

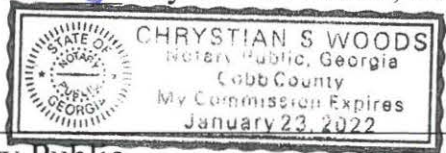


5. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
6. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 15 day of November, 2018.

  
\_\_\_\_\_  
  
\_\_\_\_\_  
Devin Young

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



\_\_\_\_\_  
Notary Public

T  
A  
B  
  
I

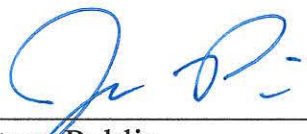


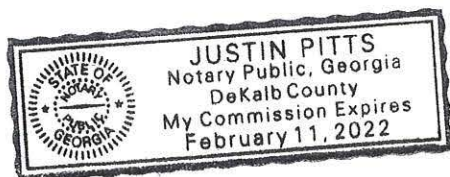
6. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
7. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway 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 13 day of November, 2018.

  
Signature

Sworn to and subscribed before me  
This the 13 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**

1. My name is Arnaud Huguet. 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 [REDACTED], Atlanta, Georgia.
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 – See below.

4. My individual circumstances are the following: My typical polling place was Gideons Elementary, which was being renovated. I was directed to vote at Pitman Park Recreation Center, which only had three operational voting



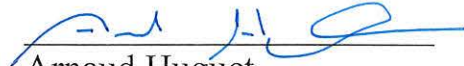
machines, even though Pitman Park had been designated as the polling place for both Gideons (which has 1200 registered voters) and Pitman Park (which has 900 registered voters). I went at noon to vote and waited 30 minutes.

Given the long lines, and given that I was told that it was going to be another hour, I had to leave and return to work. I returned to Pitman Park

Recreational Center after work at 4:00 p.m. I waited 30 minutes, but was told the wait was going to be 2-3 hours because of the limited number of machines and the size of the voter turnout. I left and returned at 6:30 p.m. to vote. At that point, I could not even find a parking space to park my car. At that time, I was told it was a 3-4 hour waiting period. Given the limited number of machines, the long wait times and the inability to find parking, I was not able to vote.

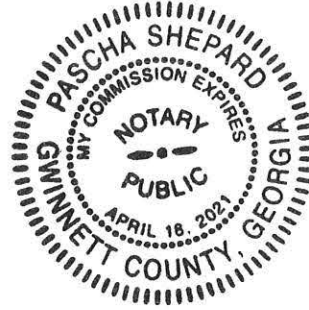
5. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
6. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway 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 11<sup>th</sup> day of November, 2018.

  
Arnaud Huguet

Sworn to and subscribed before me  
This the 11<sup>th</sup> day of November, 2018.

  
Notary Public



X-220



**STATE OF GEORGIA**

**Brian D. Kemp**

Secretary of State

Documents have been filed with this office certifying that

**ARNAUD D. HUGUET**

is

**FULTON COUNTY SURVEYOR**

**FULTON COUNTY**

Term

**JAN. 1 2017 - DEC. 31 2020**

*B. P. Kemp*  
Secretary of State

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

1. My name is Pamela Terekhova. 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 [REDACTED], Pooler, GA [REDACTED]
3. My polling location is the Rockwell Methodist Church.
4. For the 2018 Georgia General Election, I went to the polls three times, stood in long lines twice, and still was not able to cast my ballot and exercise my right to vote.
  - a. I have lived in Pooler for ten years. The Rockwell Methodist Church has always been my voting place. During the 2016, Presidential Election there was a two-hour wait. There is always a line but, this year, it was unbelievable.
  - b. I dropped my son off at school and arrived at the Church 7am. The street was extremely dark and dangerous at that hour. I drove past a long line of people waiting in the street to find a place to park. Most of the parking lot and the field were being used for the line.
  - c. After I parked, I joined the line in the street. There was no sidewalk; we were standing in the gutter. There was only enough room for one car to go by at a time; the other car would have to wait while

PJ  
11/19/19

oncoming traffic passed. There were cars trying to get by us and I thought I was going to get hit. I waited in line for about thirty minutes and the line wasn't moving at all. So I left.

- d. I came back at about 1:30pm and this time I found a place to park on the field. It was hot. The line wrapped around inside of the parking lot and the field; it did not spill out onto the street. When I got there, I saw my neighbor was there with two small children about halfway to the church, and she said that she had been in line for two hours. I thought, "Oh my god, you have a baby! This is ridiculous." There were old people there, people with babies, people sitting down on the pavement. It was hot.
- e. The Chatham County Sheriff was there, so I asked him what he could do to help. I told him it the situation was ridiculous and asked whether the old people and babies go inside. The Sheriff said, "this is my first time working at the elections; I don't know." I was appalled. He is the Sheriff of Chatham County! Finally, the elderly couple in front of me—he was 76 and his ankles were swelling—were allowed to cut the line and go inside. I counted 200 people in line at this time.
- f. I waited for two hours in the parking lot and only moved half the distance I needed to. I saw some people coming out who said they had

been there since 10:30am and it was now 2:30 in the afternoon. After hearing this, I gave up hope.

- g.** The word was that they only had 7 or 8 polling machines and because we had so many questions on the ballot, and it took 10 minutes/person to vote. My son was coming home from school, so I had to leave.
- h.** Around 6:30pm, my son and I went back. I drove for the third time to the Church and again saw people in the street and wrapped around the parking lot.
- i.** I couldn't find a parking spot and it was getting dark. It was dangerous for my son and I to stand in line on the street in the dark while cars go by. So we kept driving.
- j.** I went to the polls three times and stood in line twice, and was not able to vote.
- k.** I was glad that we didn't wait because, the next day, a woman at my church told me she was there from 6:30pm - 11:00pm. She had stood in line earlier in the day while she waited to vote and then her husband got off work and she waited with him. She estimated that there were 300-400 people in line that night.
- l.** There is another polling place on my block but it's in Savannah rather than Pooler. I saw people parking all over the place there, too. There

333  
11/17/19

were 50-60 cars in the street and 100+ cars in the parking lot. This Church let everyone in and let people sit in the pews of the church instead of making them stand in the street.

**m.** I talked to a volunteer poll worker and she told me that the precinct of Pooler has grown—it's almost doubled in the last five years or so—but the number of machines hasn't increased. There was plenty of room in the church.

**n.** They easily could have added another eight machines or so, or found another polling location entirely. They knew that they would have an issue because there were extraordinary lines in 2016; it should not have been a big surprise.

**o.** I've voted for forty years in seven other states. Longest I had to wait was one hour. Only in Georgia are people expected to stand vote to five hours outdoors.

**p.** What's going on? It was totally against my rights that I could not vote when I tried three times to do so.

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

*DO*  
*11/17/2019*

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 17<sup>th</sup> day of January, 2019.

*Pamela R. Jerrehor*

Signature

[Redacted]

*Pooler GA*



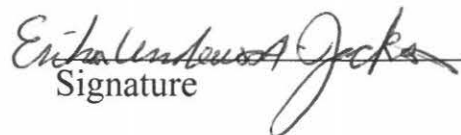
**DECLARATION UNDER PENALTY OF PERJURY  
PURSUANT TO 28 U.S.C. § 1746**

1. My name is Erika Underwood-Jackson. 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 [REDACTED]  
[REDACTED] Atlanta, GA, [REDACTED]
3. For the 2018 Georgia General Election, I was very disturbed by what I experienced and observed at my polling location, Pittman Park.
  - a. I arrived at my polling location at Pitman Park a little bit before 8 AM. When I arrived my polling place was in disarray. A line has spiraled on the way to three voting machines.
  - b. Most of the people I spoke to who were in line had been there since the polling place opened at 7 AM.
  - c. The line moved very slowly. There was no seating for the elderly and disabled so they had to stand which caused most of them to go home.
  - d. I observed around 25 elderly and disabled voters leave the line. The fact that these voters were not given any other way to vote is a travesty.
  - e. The line moved so slowly it felt as if there were technical issues with all of the voting machines and none of them were in operation.

- f.** Other voters and I asked to speak to a manager several times but a manager never came over to address us. One the poll workers told us that they should've had eight machines and that they had been calling since before they opened up to get those other machines.
- g.** While waiting in line, I called Secretary of State's office at least 12 times. Each time I was hung up on or placed on hold for an excessive amount of time.
- h.** Finally, I got on the phone with someone who told me nothing could be done and that more machines would not be coming. I also called Fulton County Board of Elections office and was hung up on several times.
- i.** In the end, I stood in line for five hours to vote.
- j.** I have never experienced such disorganization implemented to deprive people of their legal right to vote ever in my life, until that day.
- k.** Pitman Park is not my usual voting location. I typically vote at Gideon but it was closed this election cycle.
- l.** However, I found out from speaking to other voters that at least two polling locations were closed and these voters were condensed into the Pittman Park polling location, perhaps tripling the number of registered voters for this polling location.

- m.** At my previous voting location, the longest I have ever waited to vote was 45 minutes.
  - n.** I even have video that was shot showing how disorganized it was at the polling location.
  - o.** I am shocked at what I observed this election cycle. I have never seen the referee also playing in the game.
  - p.** I don't understand how a person running for an office is not made to step down from overseeing the election.
- 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 24 day of January, 2019.

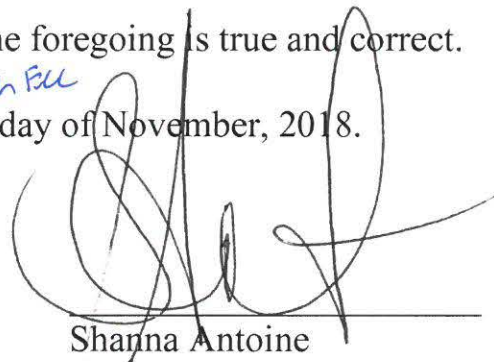
  
Signature

**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 Shanna Antoine. 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  
██████████ Duluth, GA ██████████
3. My polling location is PLEASANT HILL PRESBYTERIAN, 3700  
PLEASANT HILL RD, DULUTH, GA 30096.
4. For the 2018 Georgia General Election, I and my fellow Georgia voters at my polling location were subjected to an abnormally long wait before voting.
  - a. On Election Day, November 6, 2018, I showed up to vote at Pleasant Hill Presbyterian.
  - b. I waited there for 2 hours. Once it was time for me to go vote, they said we had to wait 15-20 minutes because there was something wrong with the system. There were only 8 machines there. Everyone was very upset to wait. We had to just stand there and wait.
  - c. They did not offer a chance to vote by paper. They then let us vote regularly. They looked to see if I was registered. They then gave me a yellow card to use in the machine to vote.

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 17<sup>th</sup> Full day of November, 2018.



Shanna Antoine

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 April Baier. 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  
[REDACTED] Fairburn GA [REDACTED]
3. For the 2018 Georgia General Election, I experienced and observed various issues voting including very long lines.
  - a. My polling location has changed every year.
  - b. This year it was at the Fairburn Baptist Church. I got to on Election Day around 5/6pm because I thought the lines would be shorter. I had to wait twenty or thirty minutes just to find a parking space. I kept driving around and around and finally someone left. There was nobody helping with parking.
  - c. There were only 10 voting booths for a few hundred people in line. The line was moving very slowly and sometimes not at all. One woman saw my kids getting irritated and antsy and she offered to let me cut, and then another woman ahead of her let me cut again.
  - d. My children are two years old and eleven years old, and my son has special needs.

- e. By the time I left, it was very dark. I had been waiting in line for at least an hour or so. If I hadn't been able to cut the line, I would have been in line for more than two hours.
  - f. People are senior citizens, people have health problems, people have neurological problems — they can't stand in line for hours. My sister wasn't even able to vote because she is pregnant and the line in her location was even longer. She couldn't stand in line for that long.
  - g. I don't know why this system is so messed up in Georgia. I'm originally from Oregon. My family said that they have never waited in line. They get their ballot a few weeks before the Election, everything is printed and easy to use.
  - h. Why can't our system be just be like others states, like Oregon? Other states don't have to wait in long lines.
  - i. The way Georgia runs election is deeply disturbing. You don't know what they're doing behind the scenes.
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 \_\_\_\_ day of December, 2018.

  
Signature



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

1. My name is Chad Carter. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of Fulton County and my address is [REDACTED]  
[REDACTED] Atlanta, GA, [REDACTED]
3. My individual circumstances are the following:
  - a. I have been voting at the same polling location since I was 18. I am now 34. At the polling location the line was out the door similar to an amusement park. There were approximately 40 people outside and more inside. I waited for an hour and a half. There were two machines available for voter verification and four voting machines open in total.
  - b. Most of the individuals in line were students, and they didn't know what was going on. I have never waited this long to vote in line. In the past I have been in line for 8 minutes max.
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 11/19/18 day of November, 2018.

A handwritten signature in black ink, appearing to read "Chad Carter", written in a cursive style.

---

Chad Carter

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

1. My name is Patricia Davis. 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 [REDACTED]  
[REDACTED] Atlanta, 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.   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 got in line at 8:30 and left at noon. My regular polling place was closed due to renovations. We only had 3 voting machines and were told by election worker there were only 39 cards. By 11:30, 5 more Voting machines were brought in by**

**Jesse Jackson. What normally took me 10 minutes took 3.5 hours. I saw my neighbor and others leave who didn't want to wait in line.**

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 14<sup>th</sup> [REDACTED] day of December, 2018.



Signature [REDACTED]

**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 Tunnizia Gilliam 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 [REDACTED]  
[REDACTED] Austell, 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.

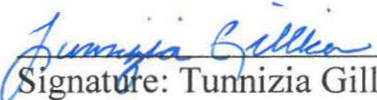
- f. \_\_\_\_\_ I was not permitted to vote using a voting machine (a DRE) (circumstances below). I asked for a provisional ballot but was told that it was too early in the day for provisional ballots or that there were not enough provisional ballots or that no provisional ballots remained.
- g. \_\_\_\_\_ 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. \_\_\_\_\_ 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 left home at 6:30 AM and went to my polling location and waited for one hour, and then I had to**

leave because of work. I returned at my lunch break at 2:20 PM and remained in line before voting until 5:30. I was allotted only one hour for lunch. As a result, I lost two hours of pay. At the polling place there were one handicap and six regular voting machines. I recall clearly that during the 2016 election there appeared to be twice as many machines.

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.

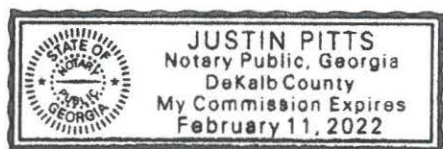
Further affiant sayeth not, this the 15 day of November, 2018.

  
Signature: Tunnizia Gilliam

Sworn to and subscribed before me  
This the 15 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**

1. My name is Velma Lambert. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of Gwinnett County, Georgia.
3. I voted at Evangel Community Church in Snellville, Georgia. There were three voting machines in use and four voting machines that were not working and turned off. I waited in line for 2 hours 45 minutes with a boot on my foot because of a broken toe. When I left, the line was longer than when I arrived. There was no place for elderly people to sit while waiting. I observed approximately 50 people leave without voting because the line was too long.
4. The machine I used to vote was glitchy and had problems going back. The poll worker stated she could not assist because she was not allowed to look at the machine while I was voting.
5. After I voted, I passed an extremely long line at Annistown Elementary School in Snellville, Georgia. I stopped to see what was going on because I thought they might be giving something away. I spoke with someone on line who said she had been waiting on line for hours to vote. While I was there, a poll worker came out and said none of the machines were working. She


apologized and said they were trying to figure out what to do. I observed a lot of people leave without voting.

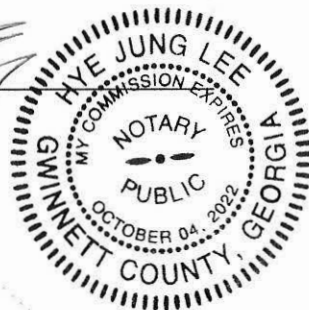
6. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
7. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway 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 13<sup>th</sup> day of November, 2018.

  
Velma Lambert

Sworn to and subscribed before me  
This the 13<sup>th</sup> day of November, 2018.

  
Notary Public



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

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 [REDACTED], Snellville, GA [REDACTED] 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 11 am. So no votes were cast before 11 am.
5. At first we were told that the license verification 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.
6. 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.
9. 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.

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 24 day of December, 2018.

  
Signature

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

1. 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 [REDACTED], Suwanee, GA [REDACTED].
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.

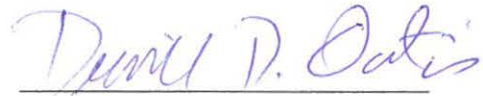
Eventually, I asked if there was protocol for testing the machines. The poll workers said that they test the machines but don't test the cards that go into the machines. What sense does that make? The gentleman who went to get the cards came back at 9:40am. They DID test those cards and they worked fine. 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.

A handwritten signature in blue ink that reads "Donald D. Oatis". The signature is written in a cursive style and is positioned above a horizontal line.

Signature

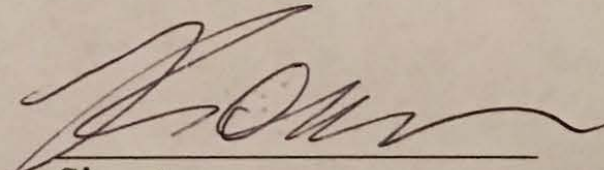
**DECLARATION UNDER PENALTY OF PERJURY  
PURSUANT TO 28 U.S.C. § 1746**

1. My name is Kevin O'Malley. 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 [REDACTED], Savannah Georgia [REDACTED].
3. My individual circumstances are the following:
  - a. On election day, I went to vote at 9:00 am at my polling location, the Jewish Education Alliance. There were seven machines that were all working, but there was still a pretty really long line. I had the day off so I told my wife to stay and vote. It took my wife an hour and 15 minutes to vote.
  - b. I went back to the same polling location at 1:00 pm and I noticed that five of the seven machines were down so only two machines were working. I saw an estimated 20 people leaving in front of me. I also counted about 128 people in front of me. I left the line because after doing the math, I realized I could not wait over 8 hours to vote.
  - c. After I left, I called the voter protection hotline and spoke to a representative who said she was going to call Chatham county and try to get more machines at the location.

d. At 4:30 pm I went back to the same polling location. They now had four machines working. I voted a regular ballot and it took me about an hour and half to vote.

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 day of November, 2018.

  
Signature

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

1. My name is Sherri Ozcomert. 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 residential address is \_\_\_\_\_; Atlanta, Georgia \_\_\_\_\_.
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 NOT changed my address.
  - 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 – PLEASE SEE SECTION 4 BELOW.
4. My individual circumstances are the following:

On Tuesday, November 6, 2018 I voted in the 2018 General Elections for the State of Georgia at my assigned precinct, Mary Lin Elementary School, where I observed several differences from my previous experiences voting at the same precinct, differences which caused substantial voter confusion, voter frustration and led to voters leaving without casting a ballot. \_\_\_\_\_

One difference I observed was the fact that there were fewer machines and fewer workers at my precinct on election day, but there were many more voters \_\_\_\_\_

Second, voters from another precinct were directed to vote at my precinct. \_\_\_\_\_

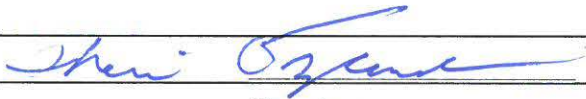
However, voters were still required to line up in one of two lines to vote.

Each line was correlated with one precinct. No poll workers actively directing voters as to which line was the correct line for the voter to line up in, according to their precinct.

Therefore, many voters waited in line to vote, only to discover upon reaching the poll worker station that the voter had lined up in the incorrect line, based on the voter's precinct, and had to line up in the back of the other line.

I observed many voters' frustration, and observed voters leaving without casting a ballot. This situation troubled me, because I worried that many citizens, through no fault of their own, had been denied their right to vote.

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 \_\_\_ day of November, 2018.



Signature

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

1. My name is Mary Price. 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 [REDACTED], Decatur, Georgia [REDACTED]

3. My individual circumstances are the following:

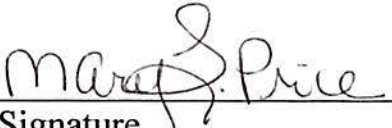
I voted early on the second day of early voting. I had voted at the same location for the primary and there was no wait. During early voting for the general election, there were only four voting booths. When I voted early for the primary, there were around eight working voting booths, so I was surprised to find only the four voting booths for early voting on this election. I heard a poll worker say that more voting booths were going to be added. It took me an hour and a half to vote.

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 26 day of November, 2018.

  
Signature

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

1. My name is Vasile Stanescu. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am registered to vote at [REDACTED], Warner Robins, GA [REDACTED]
3. My individual circumstances are the following:
  - a. I voted early in person at the Houston Health Pavilion Conference Center in Warner Robins on Friday, November 2, 2018. I waited in line for nearly two hours in order to cast my ballot. While I waited in line, the poll workers made announcements to people in line saying that voters would have an opportunity to cast their ballot, but they just had to wait and it would be a long wait.
  - b. In 2016, I voted early in person at this location, and it took me 10 minutes from start to finish.
  - c. I observed people waiting in line behind me who left the line because the wait was so long.
  - d. Additionally, I observed people who arrived later to the early voting location, asked voters in line how long we had been waiting, and left the early voting location when they learned of the wait time.
  - e. I waited precisely an hour and 48 minutes. I did cast an early vote.
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 21 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**

1. My name is Carrie Vanzant. 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 [REDACTED], Decatur, Georgia [REDACTED].
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 arrived at my polling place, Peachcrest Elementary, at approximately 8:15 am. After about an hour of waiting in line, I was near the table where you check in to get your voting card and noticed that some of the voting machines were not being used. After that, I noticed that there were no voters at any of the voting machines. I asked a poll worker about it and she said that the line was moving and to be patient. She said there were only two machines to get voting cards. I noticed that they were having trouble with the machines. One of the poll workers unplugged one of the check-in machines. Then poll workers unplugged both check-in machines. A poll worker said that both machines needed to be in sync for the count, and that

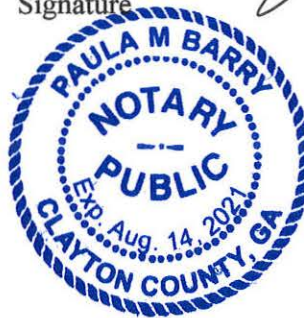
they were trying to get the machines in sync. It took 20-25 minutes to get the machines in sync and then they started checking people in again. I noticed people leaving when the machines were down. I saw several people ask whether they could take their registration form that they had already filled out with them and return later. The poll worker told them that they could not take the form with them. I voted and left the polling place at around 9:50 am. There were very long lines wrapping around a couple of hallways in the school when I left.

- 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 14<sup>th</sup> day of November, 2018.

*Corrie Vanzant*  
Signature

Sworn to and subscribed before me  
This the 14<sup>th</sup> day of November, 2018.

*Paula M. Barry*  
Notary Public



2



7. 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.
8. 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 27 day of November 2018.

A handwritten signature in black ink, appearing to be "John West II", written over a horizontal line.

Signature

**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  
[REDACTED] Snellville, Georgia, [REDACTED]
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<sup>th</sup> day of November, 2018.

  
Signature

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  
AND/OR  
SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW**

1. My name is Suzanne Urquhart. 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 [REDACTED] Atlanta, Georgia [REDACTED]
3. The matters described herein are based on my first-hand, personal knowledge.
4. On Election Day, November 6, 2018, I served as a Poll Watcher at Mary Lin Elementary School (“Mary Lin”) in DeKalb County. I arrived at Mary Lin when the polls opened at 7:00 a.m., and I left between 1:30 p.m. and 2:00 p.m.
5. Throughout the day, the poll workers were working hard and trying their best, but Mary Lin experienced a number of issues with voters.
6. Starting at the time the polls opened, there were issues with voters not being in the system. When a voter would sign in, the Mary Lin Poll Manager would call someone, and whomever the Poll Manager called would say whether or not a person could vote. In the first couple of hours, there were at least fifteen people who were not in the system; they



were allowed to cast provisional ballots, however, after the Poll Manager made the phone call.

7. Another significant issue at Mary Lin was that it was the voting location for two precincts—both Mary Lin and Epworth Church (“Epworth”)—because Epworth Church was under construction. Mary Lin was upstairs in the theater, and Epworth was downstairs in the cafeteria.
8. There were two different entrances for Mary Lin and Epworth; there were handwritten signs with arrows identifying the two different precincts. The problem, however, is that voters didn’t know if they were Mary Lin or Epworth because their voter registration cards and the My Voter Page would both indicate Mary Lin for both precincts, with the only differentiating factor being that Mary Lin would indicate “Mary Lin LE” and Epworth would indicate “Mary Lin EE.” None of the voters, however, knew what “LE” or “EE” meant.
9. As a result, and starting at 7:00 a.m., voters would wait for an hour and a half in the Mary Lin line only to get to the front of the line and be told that they had to go downstairs to Epworth—where they had to wait in line again.
10. I asked one woman how long she had been waiting in line, and she said, laughing, “*This* line?” Another woman, however, was not in such good

spirits, and she was ready to cry when she was told she had to go downstairs to vote after she had waited in the long Mary Lin line. I went downstairs with her and asked the Epworth poll workers if she could cut in line, and she was able to do so, but she was very upset.

11. The poll workers started to tell people that if they normally vote at Epworth then they needed to go downstairs. But there were a lot of new voters, and they didn't know where they normally voted. In addition, many people were adamant that they should be in the Mary Lin line because their registration cards said "Mary Lin"—because again, people did not know what the "LE" and "EE" initials meant.
12. I also witnessed people being sent back and forth between the two lines multiple times—they would wait downstairs at Epworth, then be sent upstairs to Mary Lin, wait in line at Mary Lin, and then be told they needed to go back downstairs to Epworth.
13. I know at least two people left after they waited in the wrong line. One gentleman had waited an hour and a half in the Mary Lin line and was then told he was not in the system. He said his My Voter Page showed he was active and that his precinct was Mary Lin. He became very upset, indicating that the situation was ridiculous; that he had to get to work and that was why he had come early; and that he was not willing to stand in a

whole other line and find out he was not in their system either. He said if someone would tell him where to vote, he might try. But he ultimately left Mary Lin without voting, and I don't know if he tried to vote again.

14. In addition to people not being in the system and voters being sent back and forth between the Mary Lin and Epworth lines, I also witnessed other voter issues at Mary Lin.
15. One woman was told she needed two forms of identification to vote, without explanation. This same issue had happened at the primary election; she was permitted to cast a provisional vote then. The only reason she was allowed to vote at Mary Lin on Election Day is because the Mary Lin Assistant Poll Manager recognized the woman from the primary election, and he stated that he would act as her second form of identification. She was very angry, however, questioning why she was the only one who needed two forms of identification and explaining that both her mother and either her grandmother or her aunt (I'm not sure which one) couldn't speak English and to imagine what they would have done if this identification problem had happened to them.
16. Another woman who was registered to vote came in to Mary Lin but was told she had to cast a provisional ballot. I stayed in contact with her via text message after she left Mary Lin. She called the voter protection line

and was told she had to go to the DeKalb County elections office with her identification and proof of residency. When she went to the office on Friday (November 11, 2018), she was told that the voter hotline had given her the wrong information; that she did not have to come back; and that there was nothing further she could do. She told me that other people in line at the elections office were told the same thing. She wasn't sure if her provisional ballot was counted.


17. Another gentleman had to cast a provisional ballot even though he and his family received voter cards that reflected Mary Lin as their precinct. He and his family had lived in DeKalb County since 1993, and nobody else in his family had to cast a provisional ballot. After waiting in line at Mary Lin, however, the gentleman was told he was not in the system, and he had to vote provisionally. I'm not sure his vote was counted, however, because he was told his precinct was in Morningside, which I believe is Fulton County.
18. Another gentleman had voted at Mary Lin for years. His residence is in DeKalb County, but the address on his license said Tift County. After he waited in line, he was turned away and told he had to go vote in Tift County. He left to drive to Tift County, which was almost four hours away. I don't know whether he was able to vote.

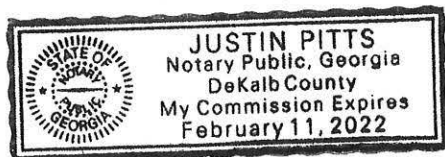
19. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
20. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway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

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

  
Signature

Sworn to and subscribed before me  
This the 13 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**

1. My name is Ami Rodrigues. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I reside at [REDACTED] Atlanta, Georgia [REDACTED] and I currently work as an attorney in Atlanta.
3. The matters described herein are based on my first-hand, personal knowledge.
4. On Election Day, November 6, 2018, I served as a Poll Watcher at First Baptist Church on Gresham Road in DeKalb County. I arrived at First Baptist at about 8:30 a.m. and did not leave until about 1:00 p.m.
5. During my time at First Baptist, I tried to talk to people who had cast provisional ballots. There was only one station at First Baptist where voters could cast provisional ballots. The Assistant Poll Manager was in charge of the provisional ballot station.
6. If anyone was having an issue with provisional ballots, the wait time for those people casting provisional ballots increased significantly. Likewise, if anyone else voting required the attention of the Assistant Poll Manager, then those people waiting to vote provisionally experienced longer wait times.
7. One specific incident I witnessed involved an elderly blind woman who wanted to cancel her absentee ballot. Her issue required the assistance of both the Poll Manager and the Assistant Poll Manager, and they were unavailable for other

voters for at least an hour while they were assisting her. Nobody was able to cast a provisional ballot during that entire hour. As a result of the increased wait time, I witnessed two other elderly individuals waiting to cast provisional ballots leave. One woman could not wait any longer because she had to pick up her grandchildren. The other was an elderly gentleman who had already been at First Baptist earlier in the day waiting to cast a provisional vote, and he had come back to try again. He left again during the hour that the poll managers were assisting the elderly blind woman. I'm not sure if he came back.

- 8. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
- 9. 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.
- 10. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 12<sup>th</sup> day of November, 2018.

Ami Kaldiken  
Signature

Sworn to and subscribed before me  
This the 12<sup>th</sup> day of November, 2018.

Marvia Lyke  
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 Kristi Feenie. 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 [REDACTED]  
[REDACTED] Atlanta, GA [REDACTED]
3. My individual circumstances are the following:
  - a. I went to my voting location, which is parkside elementary and I waited in line for somewhere between an hour and a half and two hours. While waiting I witnessed many people complaining to themselves and each other that they wouldn't be able to vote because they needed to get back to work, or take their kids to daycare, or had other obligations. I saw many of those people leave the line. I also saw many people entered the facility, saw the line, and then turned around and left.
  - b. I had no issue preventing me from voting. I did hear the poll workers say they had issues, that some of the voter cards were not working with the machines. They said for some of the machines "the card was just popping out." So they said they had to ask those voters to file



provisional ballots. I didn't see any of those cards not working with the machines.

- c. I returned about 5:30 that evening, because I'd heard they were still having issues. I brought bottled water to those in line, in case that might be the determining factor to ensure they could vote. I have voted at this location I think three times before, including presidential elections, and I've never seen lines like this.
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 15<sup>th</sup> day of November, 2018.

Kristi Feenii  
Signature

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

Doneya Peoples  
Notary Public

Doneya Peoples  
Notary Public  
Fulton County, Georgia  
My Comm. Expires 02/20/2022

**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 Sharman R. Southall. 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 [REDACTED]  
[REDACTED] Roswell, GA [REDACTED]
3. On November 6, 2018, I was a poll watcher at Argyle Elementary School, which was built in 1970 near the new Braves Stadium. Another polling place is located directly across Spring Road at the fire station. When I arrived at Argyle Elementary School 6:20am, a handful of voters were already in line to cast their ballots.
4. The voting area was located in the media center this year, though it seems to have been located in the cafeteria in past years. The cafeteria is a more open and accessible location than the media center. The media center was somewhat crowded with the students' computer terminals and book shelves.
5. Shortly after the polls opened, heavy rain and wind moved into the area. Voters were brought into the interior of the school and access to the building for voting was changed to a door located closer to the main entrance of the school. The signage was not immediately moved, however, which lead to some confusion.

6. The waiting time throughout the day ranged from about 1.5 hours to 2.5 hours due to high voter turn-out, few voting machines, and the long ballot and amendments. The long line was consistent throughout the day. Many seniors in line knew they could come to the front of the line but some did not. No handicap accessible machines were provided, but the poll workers provided chairs to those who needed one while they voted.
7. I noticed several voters who got very close to the front of the line but had to abandon the line to pick up their children from daycare or return to work – they had run out of time to wait any longer and left without voting. In all, I observed about 20-25 voters who abandon the line. Most said they would return later but I only recognized two such voters who returned later. Other voters may have left the line without voting but I could not see them from where I stood at the front of the line.
8. The parking was not plentiful at this location. I went outside several times during the day and saw that parking was always at capacity and cars had parked on the grassy areas and on the sidewalks. I always observed cars leaving the lot but do not know if they parked elsewhere or abandoned voting.
9. Our last voter in line when the polls closed completed his voting at 9:40 pm.
10. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.

11. 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.

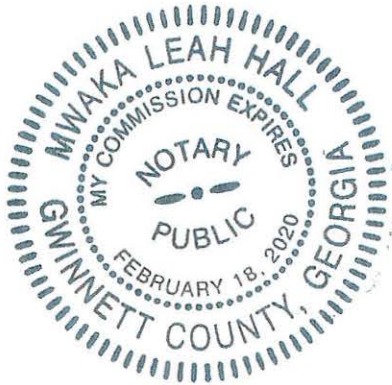
12. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 13<sup>th</sup> day of November, 2018.

Blaine R. Southall  
Signature

Sworn to and subscribed before me  
This the 13<sup>th</sup> day of November, 2018.

Mwaka Leah Hall  
Notary Public



T  
A  
B  
  
J

**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 Caroline Allen Bailey. 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 [REDACTED] [REDACTED] Decatur, GA [REDACTED]. The address on my voter registration is [REDACTED] Decatur, GA [REDACTED]
3. My individual circumstances are the following:
  - a. I am registered to vote at [REDACTED] Decatur, GA [REDACTED], in DeKalb County.
  - b. I currently attend Washington and Lee University in Lexington, Virginia.
  - c. I applied for an absentee ballot on October 22, 2018 by emailing my absentee ballot application to the Dekalb County Voter Registration and Elections Office. I had not received my absentee ballot by November 1, 2018, so I called the Voter Protection Hotline regarding my application. The Voter Protection Hotline recommended that I resend my absentee ballot application via an email that included the documentation of the first email I sent with the attached application. I sent the second email to the Dekalb County Voter Registration and Elections Office on November 1, 2018.
  - d. On November 2, 2018, I received an email from Dekalb County Voter Registration and Elections Office stating that my new absentee ballot application had been printed off, delivered to the absentee department for processing, and

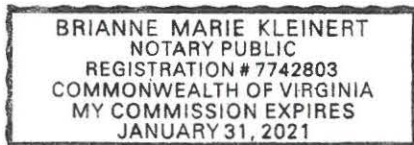
would be mailed out that day. The email also stated that Administrative Assistant did not see another request for an absentee ballot from me in the system.

- e. I did not receive the absentee ballot until Election Day, November 6, 2018, and when I called the Dekalb County Board of elections I was told that my absentee ballot must arrive by 7:00PM on Election Day.
  - f. I did not mail in my absentee 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 15 day of November 2018.

  
Signature

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

  
Notary Public



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

1. My name is Norman Broderick. 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 [REDACTED]  
[REDACTED] Powder Springs, GA [REDACTED]
3. I am retired military. I was in the military for 24 years and I have voted absentee before, while being stationed overseas.
4. For the 2018 Georgia General Election, I could not exercise my right to vote due to unacceptable errors from elections officials.
5. I tried to vote absentee. I filled out all of my forms correctly, and I sent them in on time. But my ballot arrived at the wrong address, and elections officials would not resolve the situation.
  - a. I work at the Shaw Air Force Base in Sumter, SC, so I knew I needed to vote absentee this election cycle. I submitted an application for an absentee ballot well in advance of the election.
  - b. I went to the Cobb County Elections website. I designated my residential address as one in Georgia and my mailing address as one in South Carolina to ensure that the ballot was sent to me.
  - c. I typed the form myself to ensure there were no mistakes. I emailed it in per the website instructions.



- d. Later, my wife checked the mail at our home in Georgia and informed me that my ballot had arrived at my address in Georgia, instead of my address in South Carolina.
- e. I clearly indicated that the ballot needed to be sent to South Carolina.
- f. At that point, I knew that I did not have time to return to Georgia to vote before Election Day, and I hoped to find a resolution for the issue with the Cobb County Board of Elections.
- g. I emailed the Cobb County officials to let them know I was disappointed with the process and that I wanted to file a grievance. I then visited the Cobb County Board of Elections website to file a grievance detailing my issue.
- h. On the Saturday after the election, November 10, I received a call back.
- i. An elections official informed me that they indeed made a mistake with my ballot and that, unfortunately, I would not be able to vote this cycle.
- j. She acknowledged that the elections officials had failed on their end. They committed an error by mailing my ballot to the incorrect location.

- k.** She stated that after they receive the absentee ballot application, the ballot issuance process involves three separate people who verify that the information is correct.
  - l.** Through three stages of the process, all three people, tasked with verifying the correct information, failed to ensure that my absentee ballot would be sent to the proper address.
  - m.** The elections official informed me that a resolution would not be possible and that my ballot would not be counted.
  - n.** I have copies of my application to vote absentee and the chain of email correspondence with the Cobb County Board of Elections.
  - o.** As someone who served for decades in our military, the fact that my absentee ballot was mishandled by elections officials is unacceptable.
  - p.** I did everything I needed to do to vote on my end, only to watch as my right to vote was taken away from me this election cycle.
- 6.** I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
  - 7.** 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.
  - 8.** I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 6 day of December, 2018.

  
Norman Broderick

**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 Dinesh Chandra. 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 [REDACTED], Lawrenceville, GA [REDACTED].
3. I am 72 years old and voted by absentee ballot so that I would not have to stand on a long line to vote. I returned my absentee ballot on November 5, 2018 in person to the Gwinnett County Board of Registration and Elections office located at 455 Grayson Highway, Lawrenceville, Georgia. After arriving at the Board of Elections office, I handed my ballot to the person at the desk. The person at the desk asked me to sign a sticker they put on the envelope and I did so. The person then took my ballot to another room to compare my signature with the signature they have on file for me. After approximately five minutes, the employee returned and told me that the signatures matched. The employee told me that there was nothing else I needed to do to make my ballot count. No other instructions were given to me. On November 8, 2018, I learned that my absentee ballot was rejected because it was missing the year of my birth. On the same day, I went to the same Board of Elections office and explained that my ballot was not counted

because it was missing the year of my birth. I was told that nothing could be done to correct the error and my ballot would not be counted. I believe that since my signature matched and the rest of my information was on the ballot, my ballot should be 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.
6. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 12<sup>th</sup> day of November, 2018.

*[Handwritten Signature]*  
Signature

Sworn to and subscribed before me  
This the 12<sup>th</sup> day of November, 2018.

*[Handwritten Signature]*  
Notary Public



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

1. My name is Maya Cross. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am registered to vote in DeKalb County in Georgia and my registered address is [REDACTED], Avondale Estates, GA [REDACTED]
3. For the 2018 Georgia General Election, I attempted to vote absentee, but I was subjected to a very frustrating and flawed process. Despite doing everything I could to cast my ballot, I was deprived of my right to vote.
  - a. I am an absentee voter because I am a temporary overseas resident. I am in my third year as a volunteer with the United States Peace Corps in Colombia.
  - b. Attempting to vote absentee in the 2018 General Election was a very difficult process for me.
  - c. To begin, I mailed my absentee ballot request on October 2nd from Colombia to Georgia through the U.S. embassy. The mail arrives to Washington D.C. through the diplomatic pouch and is then transferred to USPS for delivery to Georgia.
  - d. In my absentee ballot request I asked that my absentee ballot be emailed to me. I waited a couple of weeks and did not receive any

email from DeKalb County. On October 23rd, I took it upon myself to call DeKalb County internationally through Skype.


- e. DeKalb County officials told me that they didn't know anything about my request, but nonetheless decided to email me my absentee ballot the same day.
- f. The possibility exists that my absentee ballot request got lost in the mail, but I doubt it. If I had not been willing to expend my time and resources to call DeKalb County, after weeks of not receiving my ballot, I would have not even had the chance to vote.
- g. I filled out my absentee ballot and mailed it from Colombia through the Embassy on November 1. My ballot followed the same process as my ballot request, first going to Washington through the diplomatic pouch and then to Georgia through USPS.
- h. On November 10, I started email correspondence with DeKalb County as the Secretary of State's My Voter Page did not indicate that my ballot had been received. On November 15, I was told by Dekalb County that from the Colombian embassy an absentee ballot should only take a week to arrive.
- i. On December 4, I again checked the My Voter Page and my ballot was listed as rejected. The page seems to claim that my ballot was

received on November 19, and since that was after the deadline, my vote was never counted.

- j.** Having to deal with this process internationally has been very stressful. I am lucky that as a Peace Corps Volunteer, I have a schedule flexible enough to allow me to spend hours investigating and calling to make sure that my voice is heard.
  - k.** What about those who have a less flexible work schedule? What about those who have children and don't have hours to spend online trying to figure if their voice was actually heard? What if I hadn't had the time or the energy to call DeKalb County internationally after I didn't receive the absentee ballot?
  - l.** I am deeply angry that my vote was not counted. I did everything I could on my end to exercise my right to vote, and I believe my right to vote was taken away from me.
  - m.** The difficulty I had voting absentee as an eligible Georgia voter, and the fact that my vote was not counted, is completely unacceptable.
- 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 28 day of December, 2018.

  
Maya Cross

**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 Lamarra George. 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 [REDACTED]  
[REDACTED] Atlanta, Georgia [REDACTED]
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, returned it, received a confirmation of receipt, yet my vote was not counted.
  - 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 - \_\_\_\_\_  
\_\_\_\_\_

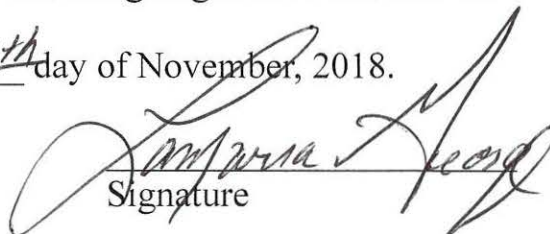
4. My individual circumstances are the following: **My son, Julien**

**Christopher George, is currently living and attending Marist College in**

Florence, Italy. Julien requested and received an absentee ballot via e-mail. He also received an electronic ballot via e-mail. Julien cast his ballot for November 6th, 2018, election, and received a confirmation from Ralph Jones at Fulton County stating that his vote had been received and counted on October 31, 2018. Having checked the MVP website online for confirmation of his vote, the website states that Julien, in fact, had not returned his ballot. This is not true. Attached is a copy of the e-mail he received confirming receipt of his vote.

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 12<sup>th</sup> day of November, 2018.

  
Signature

Sworn to and subscribed before me  
This the 12 day of November, 2018.

  
Notary Public

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

Redacted Work Product

---

**From:** Lamarra George [REDACTED]  
**Sent:** Monday, November 26, 2018 10:55 AM  
**To:** Elizabeth Conrad  
**Subject:** Fwd: Ballot Request Received

Ms. Conrad, please see the email confirm receipt of Julien's ballot. Please let me know if there is anything else you need.

Thank you.

Lamarra George, CCR-2582.

(Julien George's mother)

[REDACTED]

----- Forwarded Message -----

**From:** Julien George [REDACTED]  
**To:** Lamarra George [REDACTED]  
**Sent:** Friday, November 9, 2018, 9:59:06 AM EST  
**Subject:** Fwd: Ballot Request Received

----- Forwarded message -----

**From:** <[electronicballot\\_noreply@sos.ga.gov](mailto:electronicballot_noreply@sos.ga.gov)>  
**Date:** Wed, Oct 31, 2018 at 3:55 PM  
**Subject:** Ballot Received  
**To:** [REDACTED]

Dear JULIEN CHRISTOPHER GEORGE,

We have successfully received your ballot for one or more upcoming elections via facsimile.

To find information regarding election dates and other general updates, please visit the Georgia Secretary of State's website for military and overseas voters at:

[http://sos.ga.gov/index.php/elections/military\\_and\\_overseas\\_voting2](http://sos.ga.gov/index.php/elections/military_and_overseas_voting2).

If you need any additional information or assistance, please contact your county elections office at:

RALPH JONES  
UOCAVA CONTACT, FULTON COUNTY  
130 PEACHTREE STREET 2186  
SW  
ATLANTA, GA 30303 - 3460  
4046127060 (phone)  
4046123697 (fax)  
[ELECTIONS.ABSENTEE@FULTONCOUNTYGA.GOV](mailto:ELECTIONS.ABSENTEE@FULTONCOUNTYGA.GOV)

Thank you for being a Georgia voter.

This e-mail is an automated notification and is unable to receive replies. Please communicate directly with your county election office. They will be happy to assist you with any question or concern you may have.



- d. By Monday, November 5th, I still didn't have my ballot. On Election Day and in the days following, I saw voting issues intensifying in the news. I saw my friend Peggy Xu post on social media and speak on the record in the Washington Post about issues with her absentee ballot.
- e. Peggy's story inspired me to investigate my ballot and I checked the Secretary of State's website. On the Secretary of State's My Voter Page, I saw that Chatham County had received my ballot request form on October 25th and mailed my ballot that same day to my address in Cambridge. And yet I never received it.
- f. I checked my mail frequently after Election Day—out of morbid curiosity, I suppose—and finally received my absentee ballot the week of Thanksgiving. The packet containing my ballot had a sticker on the front, near the addresses, that said, "Received after election day."
- g. Inside was a blank ballot for the General Election with Stacey Abrams and Brian Kemp on the ballot. This was incredibly confusing; the Secretary of State's website said my request had been received before Election Day. It felt like they were rubbing salt in my wounds by



sending me a ballot I couldn't use. I was angry and threw it out. It felt like a farce.

- h.** My father is Bob Johnson. He ran for Congress in District 1 in 2014 as a Tea Party Candidate. The first time I voted was in my father's election.
  - i.** The second time I tried to vote, in 2016, I had a concussion was not able to vote. Despite all my best efforts, I was not able to vote again this year.
  - j.** Voting is very important to me. When I went to vote for my father in 2014, the campaign manager for Buddy Carter's campaign was driving around the precinct in his truck. I remember my father saying that this was illegal voter suppression. Now, I feel like things have come full circle, at a different level. It's so upsetting.
- 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 14<sup>th</sup> day of January, 2019.



Signature

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

1. My name is Roderick Jolivette. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of Muscogee County in Georgia and my residence address is [REDACTED] Midland, GA, [REDACTED]
3. My individual circumstances are the following:
  - a. My dad died in March and my mom is now living with me. I live in Muscogee County and my mom previously lived in Albany (Dougherty County). My mom is still registered to vote in Dougherty County.
  - b. I was going to take her to Albany to vote on Election Day but a few days before Election Day she was scheduled to have surgery on her foot and have her toe removed. In the week before Election Day, I went to Muscogee County Elections Office to request an absentee ballot. After some confusion, I was instructed to reach out to Dougherty County Elections Office. It was a bit unclear what the process was to request an absentee ballot in her circumstance between counties.
  - c. On Friday, November 2nd, before the deadline, I submitted the application for the absentee ballot with Dougherty County Elections

Office. That same day the Dougherty County Elections office faxed in the application and told me they would send out the ballot that same day. I was told the ballot would arrive to my home in the next 1-2 days, either Saturday or Monday, and that it should not be a problem.

- d.** After not receiving the ballot over the weekend, I called the Dougherty Elections Office to check on the status on Monday and Tuesday. I was going to let my mom fill it out and I was going to drive it to Albany on Monday or Tuesday before the polls close. As long as we received the ballot an hour or so before polls closed, we would have been able to turn it in before the deadline.
- e.** The ballot arrived on Wednesday, November 7th. My mother was upset, she really wanted to vote. My mom is 71 years old. She has been voting all her life. I remember the court made a ruling on the absentee ballots, so I thought there might be a chance I could still receive it and have it counted, especially considering the circumstances.
- f.** I continued to reach out to the Secretary of State's Office and the Dougherty County Elections Office, however, they told me it was too late for her vote to be counted. A woman I spoke with told me I should have been provided a pre-paid overnight mailing envelope for

the ballot, but I was repeatedly reassured that the absentee ballot would arrive in time for me to drop it off in Albany. It was all very frustrating and in the end my mother was not able to vote.

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 12 day of December, 2018.

  
\_\_\_\_\_  
Roderick Jolivette

**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 Jack Albert Lansky. 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. 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.

**X** Other – please explain - I am a Fulton County resident that was traveling abroad in Europe until Nov 7th, after election day. I filled out and emailed an absentee ballot application on time, but I didn't check the box for overseas resident. I didn't know exactly how I should fill the form out, and when I tried calling their office during normal

operating hours (multiple times), no one ever picked up. Eventually I emailed the form filled out as best I could, clearly describing my situation and hoping for clarification on correcting the form if necessary before it was too late. They never responded to my emails or phone calls, and there was no way to leave a message. The phone just rings and rings and eventually cuts off. Finally on election day when I still hadn't received any email, I tried calling a different department and they gave me a different phone number for a Shamira Marshall. She told me to email her the form again, which I did. Finally I was told that they mailed me a paper absentee ballot because I had filled the form out incorrectly, but that form had to be turned in by the end of the day. I explained to her that I was still abroad, had tried many times to call and email before it was too late, as I didn't know how exactly how to fill out the form based on my situation and didn't want to commit perjury. I immediately emailed the form back corrected, and also reached out directly to Shamira's supervisor, Ralph Jones, via email and phone, and even left him a direct voicemail. His number was also not available publicly and I had to get it from the North Annex. As usual, I never got a response and was never followed up with. I am upset for two reasons: 1. Most importantly, none of this would have happened if they had just done their jobs and been available to answer my questions, pick up the phone, reply to my emails, etc, and if the form was clearer. 2. I sent them back the corrected form with the proper check boxes before the deadline for electronic transmission (Friday Nov 9th) and they still never sent me the ballot, followed up with me, etc. I would also like to note that even on the original form I put my email address and checked the box requesting electronic transmission AND explained my situation clearly in the email that



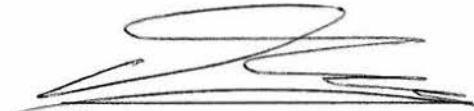
the form was attached to. I feel my vote was suppressed, whether intentionally or not, due to employee incompetence at the Fulton Absentee Office.

k. \_\_\_\_\_

\_\_\_\_\_

- 4. My individual circumstances are the following:
- 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.

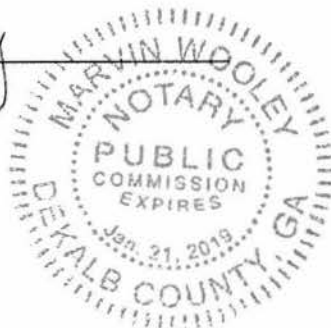
Further affiant sayeth not, this the \_\_\_\_ day of November, 2018.



Signature

Sworn to and subscribed before me  
This the 20th day of November, 2018.

Marvin Wooley  
Notary Public



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

1. My name is Sarah Laurand. 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 [REDACTED], Stone Mountain, GA, [REDACTED]
3. For the 2018 Georgia General Election, I attempted to vote absentee but my ballot was mishandled. I was disenfranchised from my right to vote for state and local offices.
  - a. I am an experienced voter who has exercised my right to vote absentee by mail many times before.
  - b. For the 2018 Georgia General Election, I requested an absentee ballot but I elected to receive my absentee ballot electronically, for the first time. Previously I have received my absentee ballot by post.
  - c. I emailed the DeKalb County to make sure that my absentee application had been accepted. DeKalb County told me that the signature had not come through so they asked me to sign and re-submit the application.
  - d. I re-submitted and signed the application. DeKalb County said they would issue a link with an electronic ballot.

- e. By October 10, since it had been a while since my previous correspondence, I was concerned because I had not received my ballot.
- f. I emailed the county again and they said they would reissue the ballot. When I received the ballot, I saw that my ballot had only federal races on it -- no statewide or local offices.
- g. I have always been able to vote for local offices, statewide offices, and statewide amendments on my ballot. I spoke with my mom because I thought this was strange.
- h. My mother said she had other issues on her ballot herself, so that prompted me to follow up. I surmised that my ballot was delivered with important parts missing due to its electronic delivery.
- i. I emailed the county on October 22 and two different officials confirmed that I had received the correct ballot.
- j. As far as I am aware of, I filled out the application in the same way as I had in previous years, and I have always received the full ballot.
- k. After the election, I reviewed my application and confirmed that I had checked the box for “temporary overseas resident,” which means I should have gotten the full ballot with statewide and local candidates.



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

1. My name is Isaac Mirza. 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 [REDACTED] Atlanta, GA, [REDACTED]. I currently live abroad in India as a Fulbright Scholar.
3. For the 2018 Georgia General Election, I had to jump over numerous hurdles and spend a considerable amount of time and resources to vote absentee.
  - a. Though I am temporarily living overseas, I knew I needed to vote in such an important election, so I prepared to vote absentee for the election cycle.
  - b. Initially, I went to the Secretary of State's web page, downloaded the absentee ballot request form, and thoroughly read the instructions for how send my form in and request my absentee ballot.
  - c. I clicked on the link that was supposed to tell me where I would need to send my absentee ballot request, but no specific name was listed: it just said "County Registrar's office."
  - d. I don't remember an email being associated with the County Registrar in DeKalb County at that time. I Googled the county registrar and got

the name “Maxine Daniels.” I emailed the application to Maxine Daniels on October 10 (IST) at [mwdaniels@dekalbcountyga.gov](mailto:mwdaniels@dekalbcountyga.gov).

- e. Within a minute, I got an auto-response from this email that said she would be retiring September 27, 2017. The email said to contact Mary Frances Weeks at [mfwweeks@dekalbcountyga.gov](mailto:mfwweeks@dekalbcountyga.gov) or Ericka Hamilton at [ehamilton@dekalbcountyga.gov](mailto:ehamilton@dekalbcountyga.gov) or 404-298-4020.
- f. I sent my application in again to those email addresses about six hours later on October 10th. But I never heard back from Mary Frances or Ericka. A week later, on October 22, I began to wonder about the status of my absentee ballot request.
- g. I Googled again and this time found a fourth email address, [voterreg@dekalbcountyga.gov](mailto:voterreg@dekalbcountyga.gov). I sent my application to that email address and they responded within five hours. Mary Frances Weeks responded and said she could not open my attachment.
- h. I sent a new copy of the application back to her. Four hours later, she told me that my request had been printed and delivered for processing. I heard nothing between October 22 and October 29.
- i. On October 29, I called the Democratic Party’s Voter Protection hotline and they could not find any record of my application online. They called the County Registrar and we did a three-way phone call.

- j.** After half an hour on the phone, the woman from the County said that she emailed me the application confirmation. I received an email from `electronicballot_noreply@sos.ga.gov` that said that my application had been approved and I would be receiving a ballot sometime soon.
- k.** Ten hours later, I got another email that said my ballot was ready on the Secretary of State's My Voter Page.
- l.** On October 30, I printed out the ballot and read the instructions many times. I have ADHD and know that's easy for me to overlook small details, so I read the instructions over, and over, and over again.
- m.** Before I put any documents in any envelope, I checked five or six times to make sure I did it correctly. I packed my ballot, included my affidavit, and went through all of the steps I was supposed to take.
- n.** Because it had taken so long for my ballot to be ready for me, I went to a DHL express and spent \$50 to have my ballot sent in time to be counted.
- o.** I stayed in the DHL office and watched the man put the label on my envelope to make sure he didn't cover the portion that said "Official Absentee Ballot."
- p.** They gave me a tracking number and told me that my ballot would arrive by Monday, November 5th. On Monday, November 5th, I

checked both the DHL page and the SOS My Voter Page to see if my ballot had made it to DeKalb County.

- q. On the DHL website, I saw that a T. Martinez had signed for the delivery on November 2, 2018 at 5:05pm. I took a screenshot.
- r. On the My Voter Page, I saw that my request had been received on October 29 and my ballot was issued on October 29. The ballot return date and ballot status were both blank.
- s. At that point, I assumed that they would update the status after they counted the votes. I was not concerned.
- t. On the morning of November 7 (India Standard Time, which was the night of November 6), my wife told me that people had problems with their absentee ballots and in person voting. I checked again on the My Voter page and discovered that my vote had not been counted. I took a screenshot.
- u. I called the Voter Protection Hotline again and they thought maybe DeKalb County had not had a chance to count everything yet and update the system. They said to wait two days. I waited two days, and on November 9, I posted on FaceBook that I had just spent 20 minutes on the phone with DeKalb County.
- v. They said that the woman who signed for my ballot “works on the opposite side of the building and they needed to track her down to




find out what happened to your package.” It sounds like someone signed for my package, put it down somewhere, and then went home for the weekend. The ineptitude was infuriating.

- w. After that woman hung up, two hours later, she called later and said that she had tracked down my ballot. I went online to the My Voter Page and saw that my vote had been counted. She had backdated my ballot so that it said it had been received on the day of the election.
- x. I’m sure that the only reason my vote counted was because, throughout the whole process, I referenced that I am a Fulbright Scholar. I used this title and position to credential why I was voting absentee and demand attention; given the stories I have heard and read, I don’t believe I would have been heard without it.
- y. This shouldn’t be happening to anyone and despite the fact that things eventually worked out for me and my ballot was counted, I can’t sit back and say everything turned out okay—it’s not okay. Even given my relative privilege, it took three days of me hounding people to track down my ballot application and, before that, get my application submitted. It was nonsense. This was an important election to make change in Georgia. I wanted to vote to help people who do not have the privileges I have.

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 20 day of February, 2019.

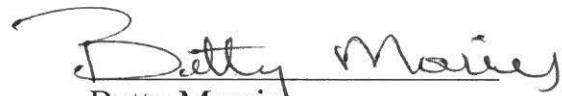
  
Signature

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

1. My name is Betty Morris. 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. For the 2018 Georgia General Election, I helped my sister submit an absentee ballot to the Dekalb County Board of Elections, which she never received. Sadly, my sister was unable to vote.
  - a. We received the absentee application request for my sister in the mail. In mid-October, well before Election Day or the deadline for submitting absentee ballots, I submitted the request for an absentee ballot on behalf of my sister, Jossiephine McClain, who has a disability.
  - b. We never received the absentee ballot, which meant my sister was not able to vote.
  - c. My sister voted in 2016; she stood in line but the lines were so long and with her disability, it made absentee voting the right thing to do.
  - d. Unfortunately, my sister was deprived of her right to vote after never receiving her absentee 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. I declare under penalty of perjury that the foregoing is true and correct.

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

  
Betty Morris

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

1. My name is Nailah Ogle. I am over eighteen years of age and competent to testify to the matters contained herein.

2. I am a resident of DeKalb in Georgia and my residence address is [REDACTED]  
[REDACTED] Stone Mountain, Georgia [REDACTED]

3. My individual circumstances are the following:

I attend law school at Georgetown University. I requested an absentee ballot the first week of October 2017. Approximately two weeks later, my mother told me that she called the DeKalb Board of Electors to inquire about my ballot and was told that it had been sent to the wrong address. I followed up with the DeKalb Board of Electors and the status I was given was pending.

No one followed up with me. I did not get to vote.

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 27 day of November, 2018.

  
Signature

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

1. My name is Robyn Roberts. 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 [REDACTED], Decatur, GA [REDACTED]
3. For the 2018 Georgia General Election, my daughter experienced an imperfect absentee ballot process that caused anxiety, and for the following runoff election, the absentee ballot process seems to have failed my daughter completely.
  - a. My daughter, Alexandra (Alex) Greiner, and I live in DeKalb County and are registered to vote there. Alex attends Wellesley College in Massachusetts.
  - b. For the General Election, Alex requested her absentee ballot around the middle of October and received it around 10 days later. She mailed the absentee ballot before the end of October.
  - c. Alex periodically checked the Secretary of State's My Voter Page (MVP) to see if her ballot had been received. She checked on Election Day, November 6, 2018, and the absentee ballot section of her MVP page did not show that her ballot was received.

- d. Alex and I were both very concerned because voting in this election was very important to her. So Alex checked MVP again on the Thursday after the Election and her absentee ballot status said that it was received on 11/05/2018 and that it was accepted.
- e. To see that her ballot counted was a relief but also caused us anxiety because the status of her ballot did not show up until after the election. We thought the ballot may not have arrived on time.
- f. Alex came home for Thanksgiving. She wanted to vote in the Run-off Election but was leaving right before Early Voting would start. In order to get an Absentee Ballot mailed to her at Wellesley as quickly as possible and to make sure the ballot request form arrived, we decided that I would deliver the form in person.
- g. She filled out the Absentee Ballot Request form and I went in person to deliver it to the DeKalb Board of Elections office on Memorial Drive on November 26.
- h. When I arrived, I handed Alex's Absentee Ballot Request form to the woman working at the Elections office. She took the form, stamped the ballot request form using a type of stamping machine, and said it should be sent out that day.



- i. To this day, December 9, 2018, Alex has not received her absentee ballot at Wellesley College. Her MVP says it was issued 11/27/18 but she never received it and did not have time to request another one.
  - j. For the general election, my daughter Alex was left wondering whether her absentee ballot had actually counted until two days after the election. Then, Alex requested her ballot well-ahead of time in order to vote in the Run-off election, but never received her ballot.
  - k. The absentee ballot process was imperfect at best for the General Election. For the runoff election, the absentee ballot process seems to have prevented Alex from exercising her right to vote altogether.
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 14<sup>th</sup> day of December, 2018.

  
\_\_\_\_\_  
Signature

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


1. My name is Mary Alexandra Romero. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of Fulton County and my address is [REDACTED]  
College Park, GA [REDACTED]
3. My individual circumstances are the following:
  - a. I voted with an Absentee Ballot because I'm currently working in New York. I requested an absentee ballot Labor Day weekend. About mid- October, I realized that friends of mine who were also voting absentee had received their ballots but I still hadn't received mine which left me confused. A friend of mine posted a number for a voter protection hotline that I called sometime mid - October.
  - b. From my conversation with the hotline, I found out that my absentee request had been rejected because I signed the ballot with a PDF e-signature instead of printing it out and manually signing it. I was never notified that my ballot was rejected. I only learned it was rejected after I called the Voter Protection Hotline.
  - c. It was early enough before Election Day that I was able to request another ballot. After doing so, I received another Absentee Ballot. When I received my second absentee ballot - I looked over everything

and realized that it did not explicitly state that an e-signature was not permissible. I was able to send in my second absentee ballot about a week and a half before Election Day.

- d. After the Election, a friend of mine posted that everyone should check the status of their vote. I proceeded to do so and online my status was listed as rejected. Again, I called the Voter Protection Hotline who connected me with the Board of Elections in Fulton County who relayed to me over the phone that my vote was counted in the system. I'm still unsure about whether my vote counted.

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 19<sup>th</sup> day of November, 2018.

  
Mary Alexandra Romero

**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 Elizabeth Tallmadge. 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 [REDACTED] Atlanta, GA [REDACTED].
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 – I applied for an absentee ballot and it was denied.


4. My individual circumstances are the following:

My husband (Allin Tallmadge DOB [REDACTED]) and I applied for our absentee ballot at end of August and never received them. We called the Voter Protection

Hotline and discovered that the ballot request was denied because of a signature issue. We were never notified and were unable to obtain new ballot because we were out of country for an extended period of time. Ultimately, we were unable to vote

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.

  
Signature

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 Marjorie Thuon. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of Fayette County in Georgia and my residence address is [REDACTED], Peachtree City, GA [REDACTED].
3. For the 2018 Georgia General Election, I received an incomplete absentee ballot, which disallowed me from voting this cycle.
  - a. I attend school in Massachusetts, and therefore needed to vote absentee this cycle. In fact, as October set in, my mother sent me regular reminders to request my absentee ballot and make my voice heard.
  - b. I visited the Secretary of State's website, printed out a form labeled 'Application for Official Absentee Ballot,' filled in the required boxes, and sent the ballot request to the email address listed for Fayette County's Election Office.
  - c. Within a few hours, I received confirmation that my application had been received for processing and thought that was that.
  - d. Then I waited for my ballot to arrive. When my absentee ballot did arrive by mail, due to academic obligations including midterm exams,

lab work, and research papers, I had to wait until one week before Election Day to sit down with the ballot.

- e. When I opened the neatly sealed white envelope, instead of a long strip of folder paper, dotted with names of state and county candidates, I found only a single question, marked for my hometown of Peachtree City, regarding the Sunday ban on the sale of alcohol.
  - f. I rechecked the envelope for the missing pages. Finding nothing, I compared my emailed application to my college-aged brother's, and they were exactly the same. Troubled, but not suspicious, I decided that the ballot must have been split into two parts.
  - g. I mailed what I thought was the 'first' ballot on November 4, and waited patiently for a 'second' ballot. A second ballot did not arrive.
  - h. I try to vote in every election—to not be a part of one so critical felt almost shameful.
  - i. I did what I needed to do, as a Georgia citizen, requesting an absentee ballot well-ahead of time.
  - j. I received nothing close to a complete ballot. My right to vote was taken away from me.
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 26 day of November, 2018.

  
\_\_\_\_\_  
Marjorie Thuon