

EXHIBIT G

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

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

SUPPLEMENTAL DECLARATION OF CHRIS HARVEY

Pursuant to 28 U.S.C. § 1746, I, CHRIS HARVEY, make the following declaration:

1.

My name is Chris Harvey. I am over the age of 21 years, and I am under no legal disability which would prevent me from giving this declaration. If called to testify, I would testify under oath to these facts.

2.

I currently am the Director of Elections for the State of Georgia. I have held that position since July 2015. From August 2007 to July 2015, I was the Chief Investigator and Deputy Inspector General for the Secretary of State's office, investigating, among other things, potential violations of state election

law. For more than a decade, I have acquired firsthand knowledge of Georgia's election processes at both the state and county level.

3.

When the Secretary of State moved the general primary to June 9, 2020, that date was selected because it was the practical last date that would allow the November election to occur on time.

4.

The certification of the August 11 runoff must be completed by August 28, 2020, with absentee ballots going to absentee and military voters beginning on September 15, 2020.

5.

Our offices, working with Dominion, have a short period of time to build databases for the November elections, have those databases proofed by local officials, have any edits made, and get final copies to counties to allow them to begin printing absentee and provisional ballots.

6.

Databases for the November election will be built in the next week.

7.

In-person early voting for the November 2020 election begins on October 13, 2020.

8.

County election officials have spent months training pollworkers to use the Dominion system. In-person training during the pandemic has been challenging and many counties had limited opportunities to train pollworkers.

9.

Following the June 9 primary, county and state election officials worked to update processes and training to ensure the November election runs as smoothly as possible.

10.

I am familiar with the relief sought by the Plaintiffs in this lawsuit, particularly for Georgia to move to an entirely hand-marked paper ballot voting system.

11.

I do not see a way it is physically possible to manage a change from one election system to another before the November election.

12.

Adding additional training burdens on county officials and pollworkers at this point is dangerous and switching from one election system to another would require significant new training.

13.

Given the difficulty of recruiting pollworkers in the pandemic, making further changes would likely cause counties to lose even more pollworkers.


14.

Ballot printing is done by only a handful of certified vendors. I do not believe any county is equipped to print a sufficient number of paper ballots for use by all voters before the November election nor am I aware that there is any available capacity nationwide to print enough paper ballots to conduct the November 2020 election on hand-marked paper ballots.

15.

While ballot-on-demand printing is available for county election offices, that system is not designed to handle printing millions of election day ballots.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 26th day of August, 2020.


CHRIS HARVEY