

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

GARLAND FAVORITO, MICHAEL SCUPIN,
TREVOR TERRIS, SEAN DRAIME,
CAROLINE JEFFORDS, STACEY DORAN,
CHRISTOPHER PECK, and ROBIN SOTIR
PETITIONERS,

v.

CIVIL ACTION NO.:

MARY CAROLE COONEY, VERNETTA
KEITH NURIDDIN, KATHLEEN RUTH,
AARON JOHNSON, MARK WINGATE,
and RICHARD BARRON
in their individual capacities,
RESPONDENTS.


NOTICE OF FILING

COME NOW, THE PETITIONERS, in the above-styled case and herein files the following documents, as attached:

1. Exhibit "A" through Exhibit "U"

Respectfully submitted this the 22nd day of December, 2020.

MADDOX & HARDING, LLC



Todd A. Harding, For the Firm
Ga. Bar No.: 101562
Attorney for Petitioner.

Maddox & Harding, LLC
Attorneys at Law
113 East Solomon Street
Griffin, GA 30223
(770) 229-4578
(770) 228-9111 facsimile

EXHIBIT "A"

AFFIDAVIT

I, Garland Favorito, of 220 Tallow Box Dr. in Roswell Ga., do solemnly declare the following statements to be true and correct based on my experience as the co-founder of Voters Organized for Trusted Elections Results in Georgia (VoterGA), and my 40+ year career as an IT professional.

1. I am a career Information Technology professional with over 40 years of experience including internet systems design, business systems analysis, database administration, application development, systems development methodology, systems integration, systems development life cycles, computer programming, project management, and multi-factor security implementations for financial transactions. My experience centers around medium- and large-scale mission-critical applications in banking, financial systems, health care, accounting, manufacturing, inventory, purchasing, retailing, utilities, telecommunications, insurance, software development and the service industry.
2. In 2006, I co-founded Voters Organized for Trusted Elections Results in Georgia (VoterGA) which continues to be a leading advocate for Election Integrity in the state. I have roughly 18 years of volunteer involvement in regards to Georgia's voting machines. My activities include research, analysis, documentation, and presentations involving Georgia's current and previous voting systems.
3. During the 2020 Primary, General and Runoff Election cycles I communicated with the Election Directors of Fulton, DeKalb, Cobb, Gwinnett and Paulding counties regarding various election matters.

4. During the week of the November 3, 2020, General Election I visited Fulton County's English St. warehouse and the State Farm Arena on two separate occasions to observe Fulton's post-Election Day mail-in ballot processing and adjudication activities.
5. On or about early morning of November 5th 2020, I was monitoring the Fulton County interim election results on the Secretary of State website and noticed the results showed former Vice President Biden with approximately 344,000 votes and President Trump with approximately 133,000 votes.
6. On or about late morning of November 5th 2020, I was monitoring Fulton County interim election results on the Secretary of State website and I noticed the results showed former Vice President Biden with approximately 364,000 votes and President Trump with approximately 132,000 votes.
7. I determined from these results that former Vice President Biden's Fulton vote totals had increased by approximately 20,000 votes while President Trump's Fulton vote totals appeared to decrease approximately 1,000 votes
8. I concluded from looking at these results that this was an irregularity since there was no obvious reason for President Trump's totals to have decreased while former Vice President Biden's totals increased dramatically
9. I further concluded that even if President Trump's vote totals had gained a small amount of votes instead, there was still an irregularity because the

great disparity of increase between the two candidates was something I had never witnessed before in my years of election monitoring

10. On the evening of November 5th, I notified Fulton Elections Director Rick Barron, the members of the Fulton Election Board and a Fulton County attorney about the irregularity and made an Open Records Request with them for the interim elections results summaries that were transmitted to the Secretary of State's office to reconstruct exactly what occurred during post-Election Day mail-in ballot processing

11. I have received no written response from anyone at Fulton County regarding my request from the time I submitted it to the day this affidavit is notarized

12. I did not monitor previous interim results to determine if any of those uploads exhibited the same irregularities during the mail-in ballot results processing.

13. Based on my based on my Information Technology and electronic voting system experience, I believe some likely root causes for the irregularity in post-Election Day mail-in ballot results I witnessed are:

- Processing of harvested ballots,
- Introduction of vote swapping malware into the tabulator or,
- A ballot definition mismatch

Any of these potential root causes would explain why the results I saw were artificially inflated for former Vice President Biden and the latter

two also would also explain why results were artificially deflated for President Trump as reportedly occurred in Antrim County, Michigan, which uses a similar version of the Dominion Democracy Suite 5.5 software that is used throughout Georgia.

14. No matter the cause, this severe irregularity has compromised current Fulton County reported results to the extent that the county must validate and hand count the scanned paper trail summaries in a manner similar to what Antrim County election officials recently did to ensure the integrity of their election results when they found 6,000 votes had erroneously shifted from President Trump to former Vice President Biden.

15. I have prepared this affidavit independently without input from any candidate, political party representative or other third party who may have some vested interest in the outcome of the election

DATED this the 16th day of November, 2020

Garland Jaroub

Signature of Affiant

SWORN to subscribed before me, this 10th day of November, 2020

Jasmine S. Youngblood
NOTARY PUBLIC

My Commission Expires: June 13, 2021

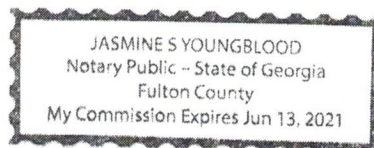


EXHIBIT “B”

GARLAND FAVORITO <garlandf@msn.com>

12/18/2020 12:09 PM

Original Open Records Request Interim Results Files Showing Vote Spike

To Todd Harding <kamikazehitman@comcast.net>

Todd,

Here is my follow up to the Fulton Election Board, Elections Director and County Attorney concerning my ORIGINAL Open Records Request for interim results files showing the Fulton County Biden Vote Spike:
Garland

From: GARLAND FAVORITO <GARLANDF@voterga.net>

Sent: Thursday, November 12, 2020 10:00 PM

To: mccooney@mindspring.com <mccooney@mindspring.com>; drkayruth@icloud.com <drkayruth@icloud.com>; aaronvjohanson@yahoo.com <aaronvjohanson@yahoo.com>; vernettanuriddin@live.com <vernettanuriddin@live.com>; wingate01md@gmail.com <wingate01md@gmail.com>

Cc: Rick Barron <richard.barron@fultoncountyga.gov>; Cheryl Ringer <cheryl.ringer@fultoncountyga.gov>

Subject: Urgent Election Result Irregularities to Resolve Prior to Certification

Chairwoman Cooney, Fulton County Board Members & Elections Officials,

I understand that you plan to certify Fulton County election results on Friday at 10am without ever responding to my Nov 6th Open Records Request and Email that documents a 20,000 vote irregularity in the published results. Attached is my affidavit that ascribes to the facts I previously mentioned to you back then. I urge you to investigate this inexplicable irregularity BEFORE you certify obviously erroneous results.

Sincerely,

Garland Favorito

VOTERGA.ORG

404 664-4044

From: GARLAND FAVORITO <GARLANDF@msn.com>

Sent: Thursday, November 5, 2020 10:20 PM

To: mccooney@mindspring.com <mccooney@mindspring.com>; drkayruth@icloud.com <drkayruth@icloud.com>; aaronvjohanson@yahoo.com <aaronvjohanson@yahoo.com>; vernettanuriddin@live.com <vernettanuriddin@live.com>; wingate01md@gmail.com <wingate01md@gmail.com>

Cc: Rick Barron <richard.barron@fultoncountyga.gov>; Jones, Ralph <Ralph.Jones@fultoncountyga.gov>; Cheryl Ringer <cheryl.ringer@fultoncountyga.gov>

Subject: URGENT: Open Records Request for Interim Election Result Summaries

Chairwoman Cooney, Fulton County Board Members & Elections Officials

I am writing to make a direct Open Records Request for:

- "an electronic copy of Interim election results summaries for each transmission made from Fulton County to the office of the Secretary of State for the November 3, 2020 election"

Interim results should be **publicly** available as they are in DeKalb County, but I cannot find it on the Fulton Elections web site. I am writing because I noticed during one of the interim result summaries where a candidate's vote totals **decreased** between transmissions while their opponent's totals increased by 20,000 votes. This would seem to be an **impossibility**. Given that this is an urgent matter that needs to be explained or resolved **prior** to election certification I am forwarding this request directly to you and bypassing Fulton's formal request process which has proven to be unhelpful in the past. Perhaps these interim results can be made available without such a request.

Thank You ,

Garland Favorito

VOTERGA.ORG

404 664-4044 CL

-
- Fulton Trump Biden Election Affidavit.pdf (2 MB)

EXHIBIT “C”

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

L. LIN WOOD, JR.,)

Plaintiff,)

v.)

BRAD RAFFENSPERGER, in his official)
capacity as Secretary of State of the State)
of Georgia, REBECCA N. SULLIVAN,)
in her official capacity as Vice Chair of)
the Georgia State Election Board,)
DAVID J. WORLEY, in his official)
capacity as a Member of the Georgia)
State Election Board, MATTHEW)
MASHBURN, in his official capacity as)
a Member of the Georgia State Election)
Board, and ANH LE, in her official)
capacity as a Member of the Georgia)
State Election Board,)

Defendants.)

CIVIL ACTION FILE NO.
1:20-cv-04651-SDG

AFFIDAVIT OF ROBIN HALL IN SUPPORT OF PLAINTIFF'S MOTION
FOR TEMPORARY RESTRAINING ORDER

I, ROBIN HALL, declare under penalty of perjury that the following is true
and correct:

1. I am over the age of 18 years and competent to testify herein. I have personal knowledge of the matters stated herein.

2. I was at the World Congress Center on Saturday, November 14, 2020. I was certified as a Fulton County recount observer. I observed many boxes of absentee or mail in ballots being counted. Many of the boxes of ballots had voted for 100% for Biden and 0% for Trump. The ballots appeared to be perfectly filled out as if they were pre-printed with the presidential candidate selected. They did not look like a person had filled this out at home. All of them looked alike. Me and the other observers wrote down which batch headers and box number ranges were suspicious. I have created a spreadsheet with the list of batch headers.

[SIGNATURE AND OATH ON NEXT PAGE]

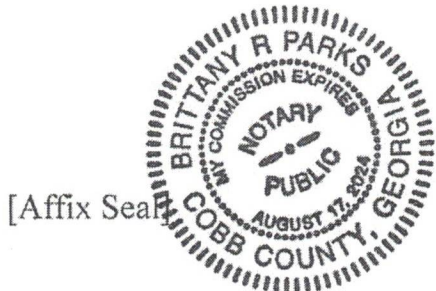
I declare under penalty of perjury that the foregoing statements are true and correct.

Robin Hall
Robin Hall

STATE OF Georgia

COUNTY OF Fulton

Robin Hall appeared before me, a Notary Public in and for the above jurisdiction, this 17th day of November 2020, and after being duly sworn, made this Declaration, under oath.



Brittany R. Parks
Notary Public

My Commission Expires AUGUST 17, 2024

EXHIBIT “D”

AFFIDAVIT

I, Judy Aube, of Roswell Ga., do solemnly declare the following statements to be true and correct:

1. I am over the age of 18 and am competent to testify herein. I have personal knowledge of the matters stated herein.
2. I was at the World Congress Center on Saturday, November 14th 2020. I was certified as a Fulton County audit monitor. I observed many boxes of mail-in ballots being counted. I observed that many of the boxes of ballots had voted 98% for Biden and 2% for Trump. The ballots appeared to be perfectly filled out as though they were preprinted with the Presidential candidate selected. They all looked alike and did not look like a person had filled the ballot out at home. The other observers and I wrote down the batches and box numbers which are suspicious. I have a list of suspicious batches.

DATED this the 19th day of December, 2020

Judy Aube
Signature of Affiant

SWORN to subscribed before me, this 19th day December, 2020

Rafael Lopez

NOTARY PUBLIC

My Commission Expires: November 5, 2023

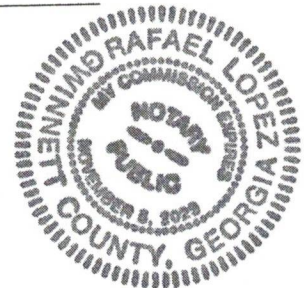


EXHIBIT “E”

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

L. LIN WOOD, JR.,)

Plaintiff,)

v.)

BRAD RAFFENSPERGER, in his official)
capacity as Secretary of State of the State)
of Georgia, REBECCA N. SULLIVAN,)
in her official capacity as Vice Chair of)
the Georgia State Election Board,)
DAVID J. WORLEY, in his official)
capacity as a Member of the Georgia)
State Election Board, MATTHEW)
MASHBURN, in his official capacity as)
a Member of the Georgia State Election)
Board, and ANH LE, in her official)
capacity as a Member of the Georgia)
State Election Board,)

Defendants.)
_____)

CIVIL ACTION FILE NO.
1:20-cv-04651-SDG

AFFIDAVIT OF SUSAN VOYLES IN SUPPORT OF
PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER

I, Susan Voyles, declare under penalty of perjury that the following is true
and correct:

1. I am over the age of 18 years and competent to testify herein. I have personal
knowledge of the matters stated herein.

2. I am a poll manager at Precinct SS02 A and B (Sandy Springs). The Fulton County Board of Elections ("BOE") sent an email soliciting poll managers and assistant poll managers for the purpose of participating in the "hand count" audit of votes cast in the November 3, 2020 presidential election. I accepted the assignment.
3. My direct supervisor, Marie Wright, asked me if I could confirm that I could show up to participate as an auditor in the recount from Saturday, November 14 until Wednesday, November 18, 2020. I was told that it was a requirement of the accepting the assignment to be available from 7:00 a.m. until 5:00 p.m on each of those five days. I was to be paid \$200 per day.
4. The BOE also solicited Fulton County employees generally, such as workers from the public libraries. Most had no election experience (other than perhaps voting themselves).
5. On Saturday at 7:00 a.m., I showed up to the Georgia World Congress Center at 285 Andrew Young International Blvd. in downtown Atlanta. We had to watch a very short training video (probably less than 5 minutes) -- there was no audio, but there were captions. I watched it three times to ensure I had captured all the information, but there were some things that were not

covered, like what an auditor should do if he or she saw matters of concern.

I did not see any helpful written materials on that issue.

6. We were required to sign an oath saying that we would conduct an audit impartially and fairly to the best of our ability, and were told that if we did anything wrong we would have to go before the State Board of Elections.
7. The BOE did not appear to have standardized operating procedures for the conduct of the audit. Everything was in total disarray at the counting location. The organizers did not have sufficient tables for all the committed volunteers. (When I arrived at 7:00 a.m., 134 tables were set up and I was assigned to table 136; ultimately, I believe 170 tables were set up.)
8. Counting began shortly after 7:00 a.m., as best as I could tell, but we were held to the side. After 90 minutes of counting had passed, we were assigned a table from additional tables that had been brought into the counting area.
9. Signs taped to the table indicated a place for ballots for Trump, Biden, and Jorgenson and to make a separate pile for "Blanks" (no vote for President) or overvotes (multiple votes for President). One person was to pick up the ballot and state the vote out loud, and the other was to confirm that selection and place the ballot in the appropriate location.

10. After counting, we were instructed to pick up each individual "pile" and count the ballots in each pile and place them in alternating stacks of 10 each. After counting the final tally, we were instructed to compare the number with the original number from the opening tally sheet. (The tally sheet provided a road map to the number that was needed to reconcile with the original reported results.)
11. We began counting around 9:00 a.m. We were given a tally sheet to record our findings, and manila envelopes for write-in candidates and disputed ballots. Again, we were not given any information or standards on how to interpret spoiled ballots or other discrepancies.
12. We noticed that the supervisors seemed selective as to how to allocate the assignments. For our first assignment, we were given a cardboard box that contained only absentee ballots. It was taped shut with packing tape with the seal of the Secretary of State. But the seal was blank, signed by no one, and no information had been supplied. There were no markings indicating the provenance of the box. The box was marked as Box No. 5 - Absentee - Batch Numbers 28-36.
13. Inside the box were stacks of ballots of approximately 100 ballots each. Each stack contained an original tally sheet that said the location where the

ballots were picked up. I am assuming these ballots came from the pervasive ballot boxes that had been placed throughout Fulton County.

14. Most of the ballots had already been handled; they had been written on by people, and the edges were worn. They showed obvious use. However, one batch stood out. It was pristine. There was a difference in the texture of the paper – it was if they were intended for absentee use but had not been used for that purposes. There was a difference in the feel.

15. These different ballots included a slight depressed pre-fold so they could be easily folded and unfolded for use in the scanning machines. There were no markings on the ballots to show where they had come from, or where they had been processed. These stood out.

16. In my 20 years' of experience of handling ballots, I observed that the markings for the candidates on these ballots were unusually uniform, perhaps even with a ballot-marking device. By my estimate in observing these ballots, approximately 98% constituted votes for Joseph Biden. I only observed two of these ballots as votes for President Donald J. Trump.

17. We left at approximately 4:45 on Saturday. There will still much to be done. We were told to come back on Sunday. It was estimated at that time that the

ballot recount would not be completed until Monday evening at the earliest – that's how many ballots were left.

18. On our way out, we spoke to a GWCC officer and thanked him for being there and his service. We asked him if he would be leaving shortly, and he said he was not scheduled to leave until 11:00 p.m. At that point, other officers would come and guard the room from 11:00 p.m. to 7:00 a.m.

19. On Sunday morning we arrived at approximately 6:45 a.m. Initially, the fact that there were so few auditors in the room indicated that others were just late. However, by 7:15 a.m., we realized that because so few additional auditors had arrived, there would not be a lot of auditors present for the Sunday count.

20. Interestingly, we were told to go back to our original table. Even though the room was sparsely occupied, we were surrounded with two auditors immediately in front of us and two auditors immediately behind us. We began to notice a greater disparity in the distribution of workloads. Although the auditing tables surrounding us arrived later, they were assigned large boxes of ballots before we were given. When our box arrived – after a 45 minute wait – I opened the ballot box to find only 60 ballots from the Quality Living Center in South Atlanta, a men's housing facility for recovering

addicts. The other auditing tables received boxes with over 3,000 ballots each.

21. After we completed our first ballot box, we raised our "check card" for more ballots. After waiting for an extended period, we were told our assistance was no longer needed and thanked for our work. We were told to go home.
22. We offered to help on some larger piles that were still evident, and the officials present were adamant that they did not need any help. I sat at the table for a while longer and noticed how other auditors were treated. We were explicitly told we could not have drinks or food of any kind on the table -- that was understandable. The people behind us and in front of us however had open water bottles, breakfast burritos supplied by the BOE, and snacks on their table.
23. Also, those tables were not counting as a team, with a pass-off from one to the other. Each auditor was counting individually. The purpose of the pass-off was to make sure that each auditor agreed that the call for each ballot was accurate.
24. This recount process was consistent with the lack of preparation, contingency plans, and proper procedures that I experienced in this unusual election. For example, in the setup for Election Day, we typically receive

the machines – the ballot marking devices – on the Friday before the election, with a chain of custody letter to be signed on Sunday, indicating that we had received the machines and the counts on the machines when received, and that the machines have been sealed. In this case, we were asked to sign the chain of custody letter on Sunday, even though the machines were not delivered until 2:00 a.m. in the morning on Election Day. The Milton precinct received its machines at 1:00 a.m. in the morning on Election Day. This is unacceptable and voting machines should not be out of custody immediately prior to an Election Day. It is possible that these ballot marking devices could have been used for other purposes during that period.

25. When I was asked to sign the chain of custody letter, I only signed the letter with the added language to state that I was accepting chain of custody for equipment, BMDs, and pole pads that had not been delivered.

26. My precinct should have received the poll pads on Sunday and should have been able to store them inside the ballot marking devices. We could not do that, since we did not receive the ballot marking devices in a timely manner.

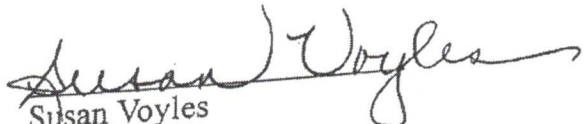
27. When we did receive the machines, they were not sealed or locked, the serial numbers were not what were reflected on the related documentation, and the

green bar coded tags that are supposed to cover the door covering the memory card was broken. The supervisor told us to use the machines in that condition. As a poll manager of over 20 years, I knew this was not the standard operating procedure for the BMDs and therefore I did not put them into service.

28. I believe my honesty in this affidavit will lead to my arrangement as a poll worker in Fulton County being compromised. However, the BOE operations were sloppy and led me, in the case of at least one box I reviewed, to believe that additional absentee ballots had been added in a fraudulent manner. This is my personal experience.

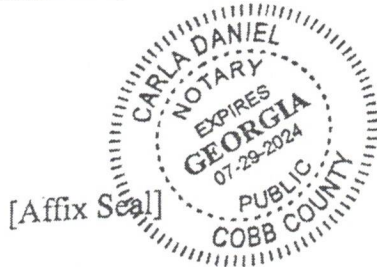
[SIGNATURE AND OATH ON NEXT PAGE]

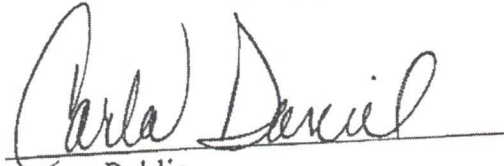
I declare under penalty of perjury that the foregoing statements are true and correct


Susan Voyles

STATE OF GEORGIA
COUNTY OF FULTON

Susan Voyles, appeared before me, a Notary Public in and for the above jurisdiction, this 17th day of November 2020, and after being duly sworn, made this Declaration, under oath.




Notary Public

My Commission Expires 07-29-2024

EXHIBIT “F”

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

L. LIN WOOD, JR.,)

Plaintiff,)

v.)

BRAD RAFFENSPERGER, in his official)
capacity as Secretary of State of the State)
of Georgia, REBECCA N. SULLIVAN,)
in her official capacity as Vice Chair of)
the Georgia State Election Board,)
DAVID J. WORLEY, in his official)
capacity as a Member of the Georgia)
State Election Board, MATTHEW)
MASHBURN, in his official capacity as)
a Member of the Georgia State Election)
Board, and ANH LE, in her official)
capacity as a Member of the Georgia)
State Election Board,)

Defendants.)

CIVIL ACTION FILE NO.
1:20-cv-04651-SDG

AFFIDAVIT OF BARBARA HARTMAN IN SUPPORT OF PLAINTIFF'S
MOTION FOR TEMPORARY RESTRAINING ORDER

I, BARBARA HARTMAN, declare under penalty of perjury that the following is true and correct:

1. I am over the age of 18 years and competent to testify herein. I have personal knowledge of the matters stated herein.
2. I was an election official auditor at the Georgia World Congress Center on Saturday, November 14, 2020 and Sunday, November 15, 2020 for the hand count of ballots from the November 3, 2020 presidential election in Fulton County, Georgia.
3. I was given several stacks of absentee ballots to count. The absentee ballots looked as though they had just come from a fresh stack. I could not observe any creases in the ballots and did not seem like they were ever folded and put into envelopes or mailed out. The marked bubbles for each candidate was filled in black ink perfectly within the circle. They looked as if they were stamped.
4. The majority of the mail in ballots that I reviewed contained suspicious black perfectly bubbled markings for Biden.

[SIGNATURE AND OATH ON NEXT PAGE]



I declare under penalty of perjury that the foregoing statements are true and correct.

Barbara Hartman
BARBARA HARTMAN

STATE OF Georgia
COUNTY OF Fulton

BARBARA HARTMAN appeared before me, a Notary Public in and for the above jurisdiction, this ___ day of November 2020, and after being duly sworn, made this Declaration under oath.

[Affix Seal]



Brittany R. Parks
Notary Public

My Commission Expires AUGUST 17, 2024

EXHIBIT “G”

COPY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

L. LIN WOOD, JR.,)

Plaintiff,)

v.)

BRAD RAFFENSPERGER, in his official)
capacity as Secretary of State of the State)
of Georgia, REBECCA N. SULLIVAN,)
in her official capacity as Vice Chair of)
the Georgia State Election Board,)
DAVID J. WORLEY, in his official)
capacity as a Member of the Georgia)
State Election Board, MATTHEW)
MASHBURN, in his official capacity as)
a Member of the Georgia State Election)
Board, and ANH LE, in her official)
capacity as a Member of the Georgia)
State Election Board,)

Defendants.)

CIVIL ACTION FILE NO.
1:20-cv-04651-SDG

AFFIDAVIT OF DR. SONIA ROLLE IN SUPPORT OF PLAINTIFF'S
MOTION FOR TEMPORARY RESTRAINING ORDER

I, DR. SONIA ROLLE, declare under penalty of perjury that the following is true and correct:

1. I am over the age of 18 years and competent to testify herein. I have personal knowledge of the matters stated herein.

2. I worked as an auditor on Saturday, November 14, 2020 and Sunday, November 15, 2020 at the Georgia World Congress Center for the hand count of ballots.

3. I have worked as an auditor and poll worker in the past, have been trained on the procedure and protocol to follow and am familiar with it. I received a very brief training for the task of auditing ballots for the November 3, 2020 presidential election in Fulton County, Georgia.

4. The training consisted of a 5-minute video without audio, or closed caption for the hearing impaired, but certainly not informative enough for those who had not worked as poll workers earlier and received better training than what was provided this time.

5. Based on my training, and my observations during the ballot counting on November 14-15, 2020, I concluded that the ballot counters at the counting tables adjacent to my counting table were not following the proper protocol and procedure put in place for us to abide by to avoid miscounting errors, and fraud.

6. Both dates that I worked as an auditor, I noticed that the tables adjacent to mine were not calling out the name of the candidate on the ballots or sorting, as we were required to do. We had been instructed to have the first person who picked up

a ballot to read out loud the selected candidate's name, hand it over to the second auditor who would then also call out the name of the selected candidate, with the goal of both auditors confirming that they were in agreement as to which presidential candidate had been selected, at which time that candidate's ballot would be placed on that candidate's bin.

7. The two-person confirmation process was not optional. It was in place to avoid counting errors and bias, the only time when two different counters would communicate with each other and agree on a candidate.

8. Another example of auditors not following proper protocol and procedure was that one ballot auditor would leave the table to use the restroom, walk around or talk to County officials, but the other ballot auditor would continue the counting procedure alone, not following the verification or conformation of agreement process.

9. This failure to abide by the rules led to errors and fraud, since the purpose of having the protocol and procedures of two-person verification in place is to avoid fraud and errors.

10. Another example of not following the proper procedure and protocol was that auditors and/or Fulton County employees had cellphones on the counting table, and

used them, while counting and auditing ballots. At training, we learned we could not have anything on the table besides what was provided to us.

11. I also observed the strikingly disproportionate distribution of ballots provided to auditors who were counting ballots, and the discrepancy was based upon whether one was a Fulton County employee, or an auditor like myself, who am not an employee of the county. I was stunned that the difference was so tilted. While I would be assigned a stack of perhaps 60 to 100 ballots to count, the two tables in front of mine, occupied by Fulton County employees, were receiving much larger stacks, in the range of 3,000 to 4,000 ballots at a time.

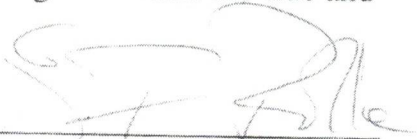
12. Additionally, I was hired to work the ballot auditing for five days but worked only one and a half days. I do not believe that was enough time to manually count the ballots if ballot auditors followed the proper protocol for counting ballots, repeating the name of the selected candidate to have two-person confirmation.

13. I also noticed that the Election Executive Director for Fulton County, Ralph Jones, was well known by some auditors and Fulton County employees who were being assigned the 3,000 to 4,000 ballots for counting. It was obvious that Ralph Jones was aware and fine with the skewed distribution of ballots to be counted.

14. Also, Republican monitors were not permitted in the area where ballots were being uploaded, but Democrats were allowed in that area, again creating a suspicious environment, where I had to question the integrity of the counting process, given so many irregularities, all preventable.

15. I have concluded that the ballot counting process at the Georgia World Congress Center on November 14-15, 2020 lacked integrity.

I declare under penalty of perjury that the foregoing statements are true and correct.

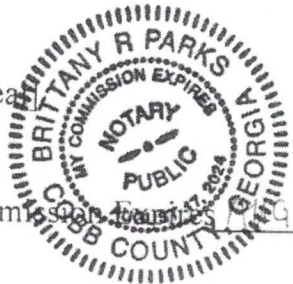

DR. SONIA ROLLE

STATE OF GEORGIA

COUNTY OF FULTON

DR. SONIA ROLLE appeared before me, a Notary Public in and for the above jurisdiction, this 18th day of November 2020, and after being duly sworn, made this Declaration, under oath.

[Affix Seal]




Notary Public

My Commission Expires AUGUST 17, 2024

EXHIBIT “H”

COPY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

L. LIN WOOD, JR.,)
)
Plaintiff,)
)
v.)
)
BRAD RAFFENSPERGER, in his official)
capacity as Secretary of State of the State)
of Georgia, REBECCA N. SULLIVAN,)
in her official capacity as Vice Chair of)
the Georgia State Election Board,)
DAVID J. WORLEY, in his official)
capacity as a Member of the Georgia)
State Election Board, MATTHEW)
MASHBURN, in his official capacity as)
a Member of the Georgia State Election)
Board, and ANH LE, in her official)
capacity as a Member of the Georgia)
State Election Board,)
)
Defendants.)
_____)

CIVIL ACTION FILE NO.
1:20-cv-04651-SDG

**AFFIDAVIT OF DR. GORDON W. ROLLE JR. IN SUPPORT OF
PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER**

I, DR. GORDON W. ROLLE JR., declare under penalty of perjury that the following is true and correct:

1. I am over the age of 18 years and competent to testify herein. I have personal knowledge of the matters stated herein.

2. I worked as a poll worker on Saturday, November 14, 2020 and Sunday, November 15, 2020 at the Georgia World Congress Center for the hand count of ballots.
3. I have worked as a poll manager and poll worker in the past, have been trained on the procedure and protocol to follow and am familiar with it. For this job of counting ballots for the November 3, 2020 presidential election in Fulton County, Georgia, I received a brief training. The training consisted of a 5-minute video without audio, not informative enough for those who had not worked as poll workers earlier.
4. Based on my training, and my observations during the ballot counting on November 14-15, 2020, I have reached the conclusion that the ballot counters in the counting tables adjacent to my counting table were not following the proper protocol and procedure put in place for us to abide by to avoid miscounting errors, and fraud.
5. For example, I observed on both dates that I worked as a poll worker that the tables adjacent to mine were not calling out the name of the candidate on the ballot as we were instructed to do. We were instructed to have the first person who picked up a ballot to read out loud the selected candidate's name, hand it

over to the second counter who would then also call out the name of the selected candidate, with the goal of both poll workers confirming that they were in agreement as to which presidential candidate had been selected, at which time that candidate's ballot would be placed on that candidate's bin. The two-person confirmation process was not optional, it was one of the most important features of the counting process, it was the only time when two different counters would communicate with each other and agree on a candidate. That was not done consistently.

6. Another example of counters not following proper protocol and procedure was that one ballot counter would leave the table to use the restroom, but the other ballot counter would continue the counting procedure alone, instead of calling for assistance, again, not following the verification or conformation of agreement process.
7. This failure to abide by the rules led to errors and fraud, since the purpose of having the protocol and procedures of two-person verification in place is to avoid fraud and errors.
8. Another example of not following the proper procedure and protocol was that Fulton County employees had cellphones and laptops on the counting table,

and used them, while counting and auditing ballots. At training, we learned we could not have anything on the table besides what was provided to us.

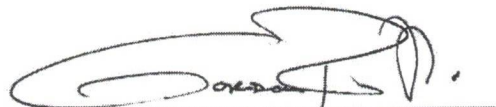
9. I also observed the strikingly disproportionate distribution of ballots provided to poll workers who were counting ballots, and the discrepancy was based upon whether one who, upon information and belief, was a Fulton County employee, or a counter like myself, who am not an employee of the county. I was stunned that the difference was so tilted. While I would be assigned a stack of perhaps 60 ballots to count, the two tables adjacent to mine, occupied by Fulton County employees, were receiving much larger stacks , in the range of 3,000 to 4,000 ballots at a time.
10. Additionally, I was hired to work the poll auditing for five days but worked only one and a half days as an auditor. I do not believe that was enough time to manually count the ballots if ballot auditors followed the proper protocol for counting ballots, repeating the name of the selected candidate to have two-person confirmation.
11. I also noticed that Ralph Jones, the Election Executive Director for Fulton County, was known and friendly with the Fulton County employees who were being assigned the 3,000 to 4,000 ballots for counting. It was clear that Ralph

Jones was aware and in agreement with the tilted distribution of ballots for counting, most of these ballots – 3,000 to 4,000 on one table, versus 60 ballots on my table, every time.

12. I also recall that Republican monitors were not permitted in the area where ballots were being uploaded, but Democrats were allowed in that area.

13. In conclusion, the ballot counting process at the Georgia World Congress Center on November 14-15, 2020 was not transparent.

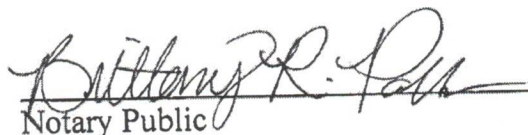
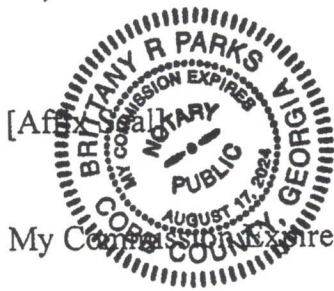
I declare under penalty of perjury that the foregoing statements are true and correct.



DR. GORDON W. ROLLE JR.

STATE OF GEORGIA
COUNTY OF FULTON

DR. GORDON W. ROLLE JR. appeared before me, a Notary Public in and for the above jurisdiction, this 18th day of November 2020, and after being duly sworn, made this Declaration, under oath.



Notary Public

My Commission Expires AUGUST 17, 2024

EXHIBIT “I”

GARLAND FAVORITO <garlandf@msn.com>

12/18/2020 12:09 PM

Original Open Records Request Interim Results Files Showing Vote Spike

To Todd Harding <kamikazehitman@comcast.net>

Todd,

Here is my follow up to the Fulton Election Board, Elections Director and County Attorney concerning my ORIGINAL Open Records Request for interim results files showing the Fulton County Biden Vote Spike:
Garland

From: GARLAND FAVORITO <GARLANDF@voterga.net>

Sent: Thursday, November 12, 2020 10:00 PM

To: mccooney@mindspring.com <mccooney@mindspring.com>; drkayruth@icloud.com <drkayruth@icloud.com>; aaronvjohanson@yahoo.com <aaronvjohanson@yahoo.com>; vernettanuriddin@live.com <vernettanuriddin@live.com>; wingate01md@gmail.com <wingate01md@gmail.com>

Cc: Rick Barron <richard.barron@fultoncountyga.gov>; Cheryl Ringer <cheryl.ringer@fultoncountyga.gov>

Subject: Urgent Election Result Irregularities to Resolve Prior to Certification

Chairwoman Cooney, Fulton County Board Members & Elections Officials,

I understand that you plan to certify Fulton County election results on Friday at 10am without ever responding to my Nov 6th Open Records Request and Email that documents a 20,000 vote irregularity in the published results. Attached is my affidavit that ascribes to the facts I previously mentioned to you back then. I urge you to investigate this inexplicable irregularity BEFORE you certify obviously erroneous results.

Sincerely,

Garland Favorito

VOTERGA.ORG

404 664-4044

From: GARLAND FAVORITO <GARLANDF@msn.com>

Sent: Thursday, November 5, 2020 10:20 PM

To: mccooney@mindspring.com <mccooney@mindspring.com>; drkayruth@icloud.com <drkayruth@icloud.com>; aaronvjohanson@yahoo.com <aaronvjohanson@yahoo.com>; vernettanuriddin@live.com <vernettanuriddin@live.com>; wingate01md@gmail.com <wingate01md@gmail.com>

Cc: Rick Barron <richard.barron@fultoncountyga.gov>; Jones, Ralph <Ralph.Jones@fultoncountyga.gov>; Cheryl Ringer <cheryl.ringer@fultoncountyga.gov>

Subject: URGENT: Open Records Request for Interim Election Result Summaries

Chairwoman Cooney, Fulton County Board Members & Elections Officials

I am writing to make a direct Open Records Request for:

- "an electronic copy of Interim election results summaries for each transmission made from Fulton County to the office of the Secretary of State for the November 3, 2020 election"

Interim results should be **publicly** available as they are in DeKalb County, but I cannot find it on the Fulton Elections web site. I am writing because I noticed during one of the interim result summaries where a candidate's vote totals **decreased** between transmissions while their opponent's totals increased by 20,000 votes. This would seem to be an **impossibility**. Given that this is an urgent matter that needs to be explained or resolved **prior** to election certification I am forwarding this request directly to you and bypassing Fulton's formal request process which has proven to be unhelpful in the past. Perhaps these interim results can be made available without such a request.

Thank You ,

Garland Favorito

VOTERGA.ORG

404 664-4044 CL

-
- Fulton Trump Biden Election Affidavit.pdf (2 MB)

EXHIBIT “J”

AFFIDAVIT OF BRIDGET THORNE

Comes now, Bridget Thorne, and after being duly sworn makes the following statement under oath:

1. My name is Bridget Thorne.

2. 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.

3. I reside at 1195 Seale Drive, Alpharetta, GA 30022.

4. I was certified by Fulton County as a voting technician. I was hired as a certified technician to temporarily assist Dominion Voting Systems with preparation for the Fulton County Georgia General Election from October 27 thru November 1, 2020 at the Georgia World Congress Center, Building B, where all of the Fulton County voting machinery was tested and calibrated.

5. The testing and calibration process entailed printing 21 test ballots for each ballot marking device (BMD) from each voting precinct. (The number of test ballots was dictated by the 21 candidates in the Loeffler senate race.)

6. Based on my knowledge and belief, the test ballots could have been run on plain paper, making them easily distinguishable from live Georgia ballots.

7. The test ballots were printed on the same Roland Voter Paper (heavy cardstock) as used for actual ballots, making them, in every way, indistinguishable from live Georgia ballots.

8. Over the entire course of my experience, these test ballots were handled by Dominion employees in a haphazard and careless way. At times there were stacks of “test ballots” unsecured all over the facility.

9. I am personally aware that some batches of test ballots were lost during the process and I was required to reprint entire polling districts test ballots a second time.

10. On October 28, I became concerned that these ballots were unsecure and indistinguishable from live ballots, so I began, with my daughter, Kenedy Thorne (also a technician for Dominion Voting) to “spoil” some of the ballots by either marking through the QR code on the ballot with a pen or simply tearing the ballot.

11. I spoiled approximately a couple thousand test ballots.

12. Based on my knowledge and belief, there were thousands of test ballots that were not spoiled.

13. The test ballots were ostensibly collected for shredding, but I do not know if they were ever shredded.

14. During the testing and calibration process, a consultant from The Elections Group named Mike (LNU) was present.

15. On November 1, 2020 approximately 10 pm, I observed Mike assisting another employee with generating test ballots for a district. Mike, however, was generating random ballots. He was not using the procedure for generating test ballots. I explained to Mike that he needed to generate the test ballots in a particular way, specifically, voting for the first candidate first, the second candidate on the next, etc. Mike asked me, "Do I have to vote for Trump?" I told him he did.

16. During the testing and calibration process, Richard Barron, the Fulton County Supervisor of Elections was present during much of the time.

17. On October 30, 2020, after the conclusion of early voting, all the equipment from the State Farm Arena was brought to Georgia World Congress Center, Building B to be prepared for election day voting.

18. When the equipment was brought in, Dominion personnel began to prep the equipment for election day. As part of the process, the vote tabulators (scanners) were all opened. There were approximately 50 tabulators from State Farm Arena.

19. Every tabulator had voted ballots in the ballot bins. These were, based on my knowledge and belief, actual voted ballots from early voting that were not removed and secured.

20. The ballots were removed by Dominion personnel and stacked, haphazardly. Some were left unattended for periods of time.

21. Based on my knowledge as a poll manager, these voted ballots should have been securely transported using two-person security. These ballots were simply left in the scanners and dropped at the warehouse.

22. There were Dominion personnel alone with scanners in all parts of the facility removing ballots from these machines.

23. During the process, these ballots were eventually gathered in suitcases (ballot cases) and collected into the corner of the facility.

24. At one point, I saw 50-60 ballot cases stacked in the corner. I estimate that each case could have held over 6,000 ballots.

25. I was upset by this. One of the warehouse employees, Tia (LNU) told me, "Bridget, don't worry about it...we've been doing this all week."

26. On election day, I was credentialed as the Poll Manager at the Johns Creek polling location. I was told in an email sent to all poll managers from my regional supervisor (supervisor of elections office) the Sunday before election day that we would have ACLU "clerks" for absentee ballots in each precinct.

27. I replied all and asked what, exactly, these ACLU clerks would be doing. Nobody of authority from Fulton County answered.

28. I was at the Georgia World Congress Center, Building B when the email exchange took place and Richard Barron was behind me, so I went and asked him about the ACLU clerks.

29. He gave me the impression that the supervisor should not have mentioned the ACLU. He said, "She shouldn't have said that [meaning ACLU clerk]. She should have just said you are having absentee clerks," or words to that effect.

30. I looked on the Atlanta ACLU website and they were advertising to have people come to volunteer as absentee clerks.

31. When I arrived at Johns Creek on election day, there was a woman from the ACLU there who served as the absentee clerk.

32. She told me she was a lawyer and was trained earlier that week.

33. I was given a laptop for her to use, but we could not find the password. She told me she would just use her personal laptop.

34. She, apparently, had access on her personal device to the voter database in order to clear the absentee voter.

35. I do not recall if she had a name tag or badge, but she was in the voting area near the poll pad station.

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

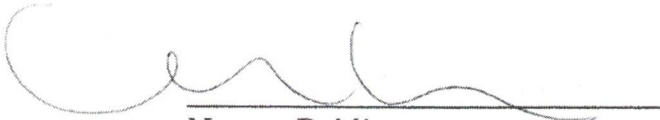
Executed this 17th day of November 2020.



Bridget Thorne

State of Georgia
County of Fulton

Appeared before me Bridget Thorne, this 17th day of November 2020 and after being duly sworn, stated the forgoing statements are true and correct to the best of her knowledge and belief.



Notary Public

My commission expires 05/04/2021



EXHIBIT “K”

AFFIDAVIT OF DAVID CROSS
WITNESS TO EVENTS OF ELECTION FRAUD
IN FULTON COUNTY, GA

I, David A. Cross, declare under penalty of perjury that the following is true and correct:

1. I am over the age of 18 years and competent to testify herein. I have personal knowledge of the matters stated herein.
2. I attended the 2nd Georgia election recount at The Georgia World Congress Center on Wednesday, November 24th, 2020.
3. As a recount witness, I was one of 6 people allowed to walk the floor for the recount.
4. Ballots were not hand counted during the time I attended. Ballots were fed into high-speed scanners only.
5. No witness was able to read the tally on the computer screens that were in front of the election workers.
6. I noticed well over 100 ballot transport bags and I inspected the bags.
7. I identified a minimum of 9 ballot transport bags that were not secure meaning the bags were missing their security zip tabs.

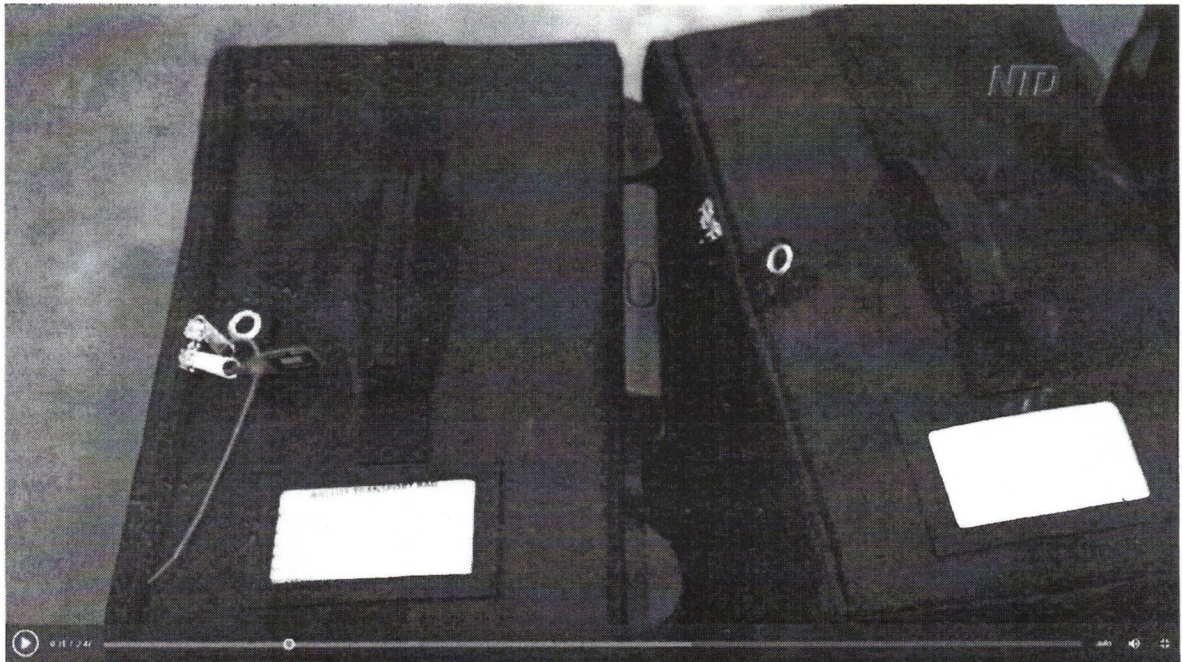
8. Security zip tabs are required to maintain proof of chain of custody.

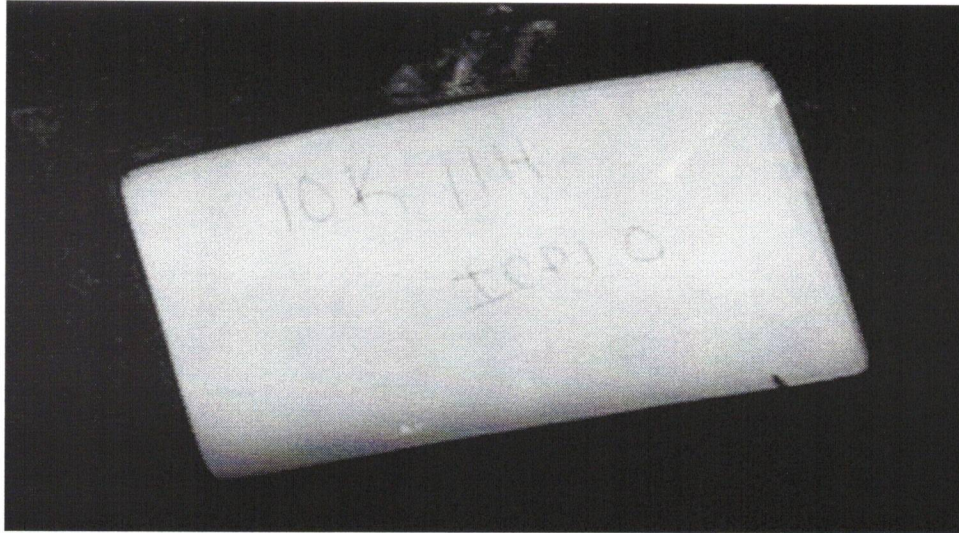
9. I notified other election recount witnesses of the missing security zip tabs. I was told “that’s not possible, every ballot transport bag must have a security zip tab”.

10. The ballot transport bags without security tags are as follows:

12J	08 B/C	07 C
08 D	12 KIN or 12 K/N	07 A
AP 05 (zero 5)	12 F	10K 11H

11. Ballot transport bag 10K 11H is shown below with no security tags and a close-up is shown below the first picture.





12. I walked the 3 of the other election witnesses over to the area where the ballot transport bags were stored. When I approached the ballot transport bags, I used my foot to point to one of the bags that had no security tag. I was immediately accused of touching the bag and told that I must leave.

13. Before I was ejected, I notified a member of the press, Melina Wisecup, and her photographer about the unsecured ballot transport bag, told them I was being asked to leave, and I asked them to document the unsecured bag.

14. Officer Keith McKinnon and Lt. James Swofford were summoned to escort me out. Before we left, I showed both officers the unsecured ballot transport bag.

15. Photographs were taken (the photo above) and I made a statement to the reporter.

16. A news story was made and is accessible here

https://www.ntd.com/security-concerns-during-georgia-recount_532930.html

[SIGNATURE AND OATH ON NEXT PAGE]

I declare under penalty of perjury that the foregoing statements are true and correct.

David A. C.
DAVID A. CROSS

STATE OF Georgia

COUNTY OF Coweta

DAVID CROSS appeared before me, a Notary Public in and for the above jurisdiction, this 9th day of December 2020, and after being duly sworn, made this Declaration under oath.



Karen Karl
Notary Public

My Commission Expires 6/29/2021

EXHIBIT “L”

<https://livestream.com/accounts/25225474/events/9117221/videos/214677184>

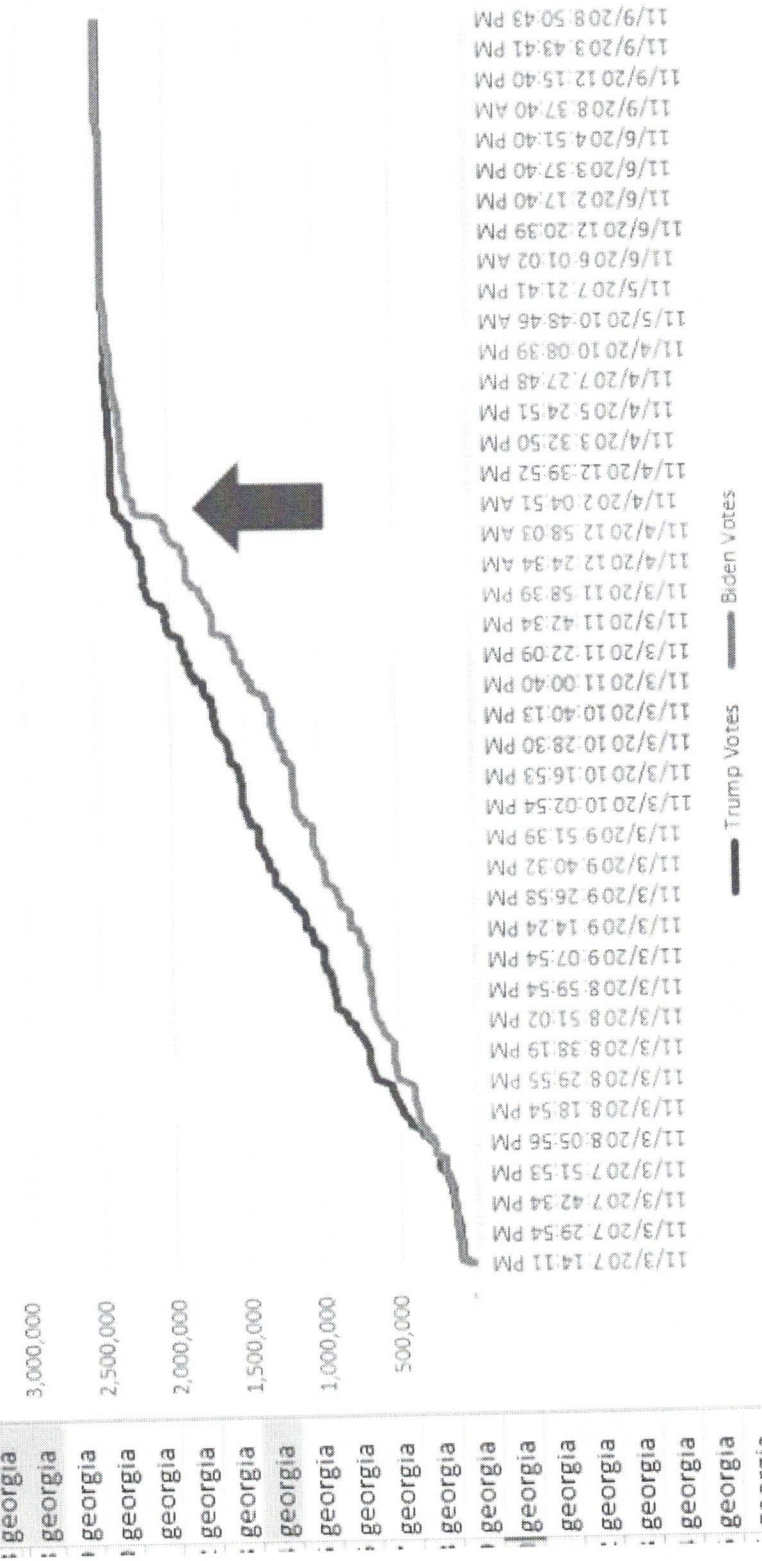
EXHIBIT “M”

<https://livestream.com/accounts/26021522/events/8730585/videos/214364915>

EXHIBIT “N”

state	Adjusted Zulu to Local Time	Total Votes	Trump %	Biden %	Trump Votes	Biden Votes	Total	Trump Change of Interval Previous Time Stamp	Trump % Change of Interval	Biden Change of Interval Previous	Biden % Change of Interval	Time from last report hours:min:sec
georgia	11/4/20 1:23:49 AM	4,463,227	52.000%	46.700%	2,320,878	2,084,327	4,463,227	22,380	33%	45,124	66%	0:02:00
georgia	11/4/20 1:32:50 AM	4,463,897	52.000%	46.700%	2,321,000	2,084,600	4,463,897	219	51%	313	47%	0:09:01
georgia	11/4/20 1:34:49 AM	4,626,656	50.800%	48.000%	2,350,341	2,220,795	4,626,656	29,115	18%	136,155	84%	0:01:59
georgia	11/4/20 1:36:50 AM	4,671,046	50.600%	48.100%	2,363,519	2,246,772	4,671,046	13,208	30%	25,978	59%	0:02:01
georgia	11/4/20 2:04:51 AM	4,671,331	50.600%	48.100%	2,363,519	2,246,772	4,671,331	0	51%	137	48%	0:28:01
georgia	11/4/20 2:14:55 AM	4,710,000	50.500%	48.000%	2,363,519	2,246,772	4,710,000	0	49%	31,245	69%	0:16:05
georgia										577	48%	0:00:57
georgia										18,788	98%	0:37:02
georgia										13,035	77%	0:12:01
georgia		3,000,000								798	49%	0:10:59
georgia		2,500,000								665	49%	0:16:40
georgia		2,000,000								2	49%	0:13:20
georgia		1,500,000								549	49%	0:15:00
georgia		1,000,000								4,906	49%	0:12:00
georgia		500,000								9,385	100%	0:00:22
georgia										2,237	49%	0:01:37
georgia										1,321	49%	0:02:00
georgia										2,253	49%	0:02:42
georgia										253	49%	0:12:20
georgia										786	49%	0:50:01
georgia										12,996	78%	0:17:53
georgia										2,698	49%	0:06:05
georgia										519	49%	0:02:57
georgia										1,367	49%	0:22:03
georgia										368	49%	0:07:58
georgia										128	49%	0:15:00
georgia										1,666	100%	1:41:11

Georgia

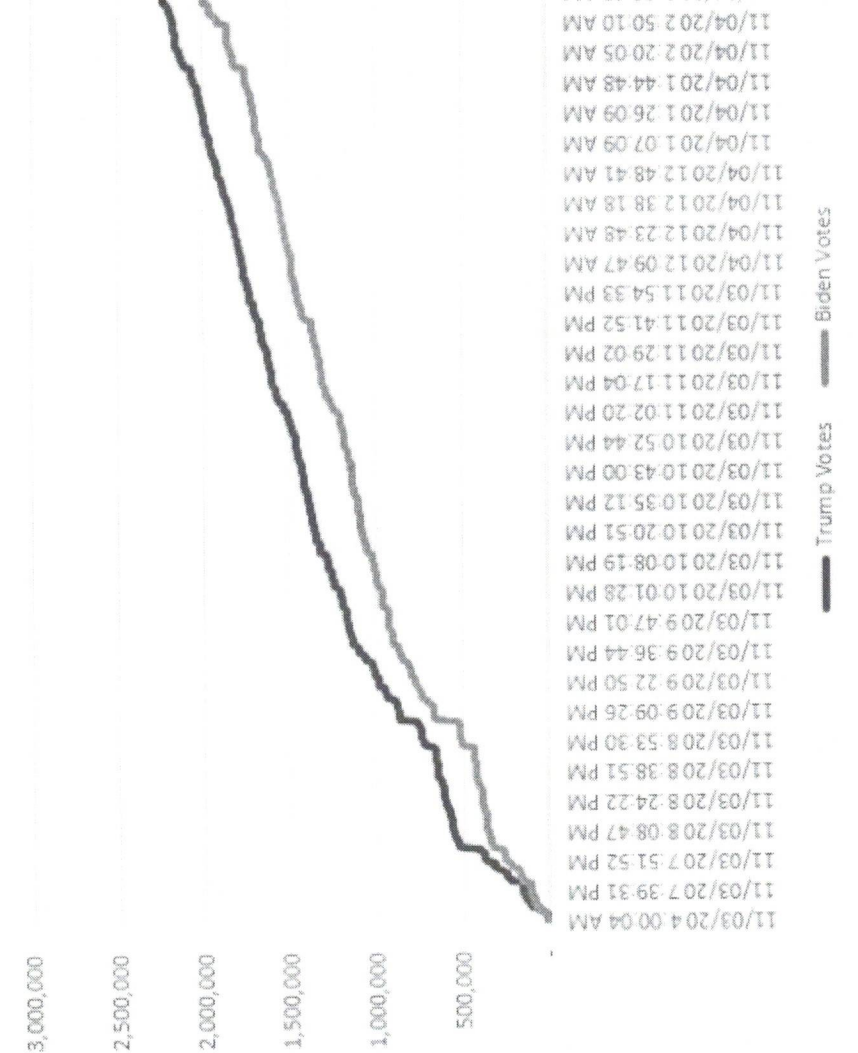


Legend: — Trump Votes, — Biden Votes

EXHIBIT “O”

Time	Total Votes	Trump %	Biden %	Trump Votes	Biden Votes	Trump %		Biden %		# of votes since last time stamp	Time from last report
						Interval Change	Previous Time Stamp	Interval Change	Previous Time Stamp		
11/03/20 4:00:04 AM	-	0.0%	0.0%			4,432	51.3%	4,061	47%	8,640	00:15.0
11/03/20 4:14:48 AM	4,564,424	51.3%	47.0%	2,341,550	2,145,279	385	1.3%	353	47%	751	11:59.0
11/03/20 4:26:47 AM	4,565,175	51.3%	47.0%	2,341,935	2,145,632	4,402	51.3%	4,405	47%	9,380	05:01.0
11/03/20 4:31:48 AM	4,574,555	51.3%	47.0%	2,346,747	2,150,041	5,968	4%	141,258	94%	149,772	0:00:05
11/03/20 4:31:53 AM	4,724,327	49.8%	48.5%	2,352,715	2,291,299						
11/03/20 4:52:08 AM	Trump's lead vanishes in a single vote upload at 5:31 am when										
11/03/20 4:52:10 AM	Biden appears to recieve over 140,000 votes. This happened in										
11/03/20 4:52:10 AM	Georgia at 1:34 am and Wisconsin at 3:42 am										
11/03/20 4:52:10 AM	4,866,279	49.4%	48.9%	2,403,942	2,379,610						
11/03/20 4:52:25 AM	4,866,299	49.4%	48.9%	2,403,952	2,379,620						
11/03/20 4:52:36 AM	4,867,492	49.4%	48.9%	2,404,541	2,380,204						
11/03/20 4:52:51 AM	4,868,902	49.4%	48.9%	2,405,238	2,380,893						
11/03/20 4:52:53 AM	4,873,736	49.4%	48.9%	2,407,626	2,383,257						
11/03/20 4:52:57 AM	4,874,836	49.4%	48.9%	2,408,169	2,383,795						
11/03/20 4:52:58 AM	4,883,065	49.4%	48.9%	2,412,234	2,387,819						
11/03/20 4:52:59 AM	4,915,925	49.4%	48.9%	2,428,467	2,403,887						
11/03/20 4:52:59 AM	4,937,389	49.4%	48.9%	2,439,070	2,414,383						
11/03/20 4:52:59 AM	4,963,304	49.3%	49.0%	2,446,909	2,432,019						
11/03/20 4:52:59 AM	5,023,632	49.2%	49.2%	2,471,627	2,471,627						
11/03/20 4:52:59 AM	5,025,801	49.2%	49.2%	2,472,694	2,472,694						
11/03/20 4:52:59 AM	5,048,379	49.1%	49.2%	2,478,754	2,483,802						
11/03/20 4:52:59 AM	5,055,174	49.1%	49.2%	2,482,090	2,487,146						
11/03/20 4:52:59 AM	5,080,970	49.1%	49.3%	2,494,756	2,504,918						
11/03/20 4:52:59 AM	5,095,176	49.1%	49.3%	2,501,731	2,511,922						
11/03/20 4:52:59 AM	5,106,890	49.1%	49.3%	2,507,483	2,517,697						
11/03/20 4:52:59 AM	5,107,896	49.1%	49.3%	2,507,977	2,518,193						
11/03/20 4:52:59 AM	5,108,580	49.1%	49.3%	2,508,313	2,518,530						
11/03/20 4:52:59 AM	5,110,614	49.1%	49.3%	2,509,311	2,519,533						

Michigan



— Trump Votes — Biden Votes

EXHIBIT “P”

Trump and Biden % were given.

Adjusted Zulu to Local Time	Total Votes	Trump %	Biden %
11/4/20 2:32:00 AM	3,002,469	50.9%	47.3%
11/4/20 3:08:47 AM	3,008,366	50.9%	47.3%
11/4/20 3:37:04 AM	3,018,212	50.9%	47.3%
11/4/20 3:42:20 AM	3,186,598	49.0%	49.3%

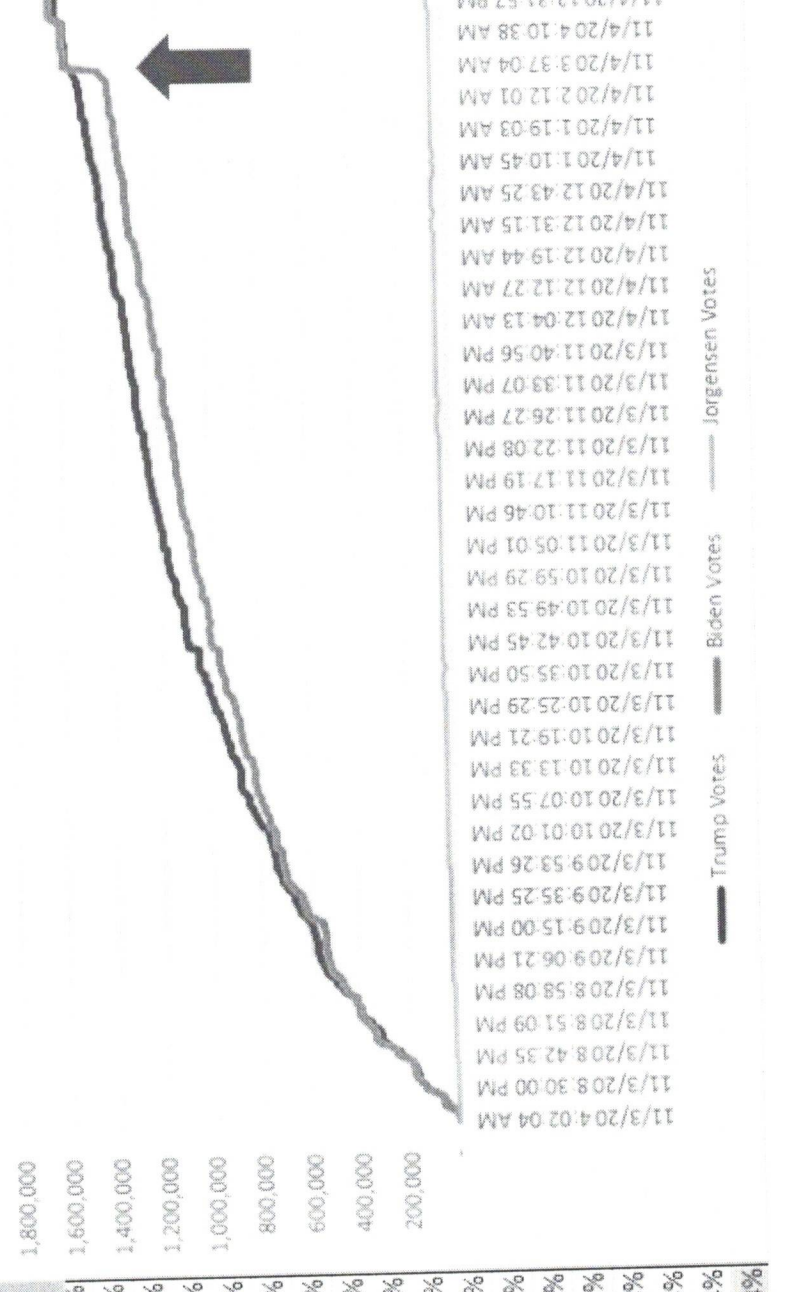
Trump's lead vanishes in a single vote upload at 3:42 am when Biden appears to receive over 140,000 votes. This happened in Michigan at 5:31 am and Georgia at 1:34 am

11/4/20 4:02:07 AM	3,202,347	49.0%	49.3%
11/4/20 4:07:31 AM	3,203,733	49.0%	49.3%
11/4/20 4:09:41 AM	3,207,446	49.0%	49.3%
11/4/20 4:10:38 AM	3,209,150	49.0%	49.3%
11/4/20 4:15:30 AM	3,210,961	49.0%	49.3%
11/4/20 4:25:53 AM	3,215,161	49.0%	49.3%
11/4/20 4:38:22 AM	3,217,007	49.0%	49.3%
11/4/20 5:03:24 AM	3,218,631	49.0%	49.2%
11/4/20 6:04:37 AM	3,265,757	49.0%	49.3%
11/4/20 6:16:38 AM	3,296,836	48.8%	49.5%
#####	3,297,199	48.8%	49.4%
11/4/20 12:27:01 PM	3,297,134	48.8%	49.4%
11/4/20 12:31:57 PM	3,297,137	48.8%	49.4%
11/5/20 9:52:13 AM	3,297,408	48.8%	49.4%
#####	3,297,420	48.8%	49.4%
11/6/20 2:08:43 PM	3,297,421	48.8%	49.4%
11/6/20 2:16:38 PM	3,297,471	48.8%	49.4%
11/6/20 5:02:13 PM	3,297,473	48.8%	49.4%

Red Indicates Vote Reduction from	Trump Votes	Biden Votes
Trump Votes	1,528,257	1,420,168
Change from Previous Time Stamp	1,531,258	1,422,957
Interval Change	1,526,270	1,427,614
Time Stamp	1,561,433	1,570,993

Trump Change from Previous Time Stamp	Trump % of Interval Change	Biden Change of Interval Change	Biden % of Interval Change	# of votes since last time stamp	Time from last report hours:min:sec
14,054	36%	24,494	62%	39,255	0:04:21
3,002	51%	2,789	47%	5,897	0:36:4
5,017	51%	4,657	47%	9,846	0:28:11
25,163	15%	143,379	85%	168,386	0:05:11

Wisconsin



Legend: Trump Votes (thick black line), Biden Votes (thin grey line), Jorgensen Votes (dotted line)

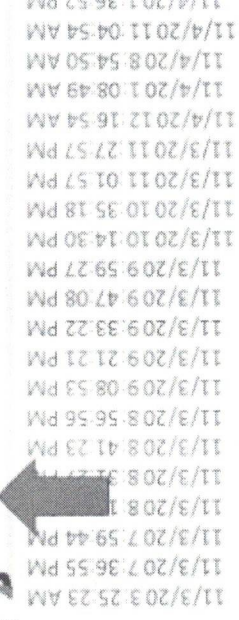
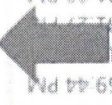
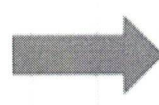
11/3/20 4:02 AM
11/3/20 8:30 PM
11/3/20 8:42 PM
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11/3/20 8:58 PM
11/3/20 9:06 PM
11/3/20 9:15 PM
11/3/20 9:25 PM
11/3/20 9:35 PM
11/3/20 9:45 PM
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EXHIBIT “Q”

Total	Trump		Biden		Trump			Biden			Change from Trump % of Biden Change			Biden %			
	ies	▼ Trump	▼ Biden	Votes	Votes	Change	Interval	Time Stamp	Change	Interval	Time Stamp	Change	Interval	Time Stamp	Change	Interval	Time Stamp
327,352	55.7%	43.0%	2,967,335	2,290,761	2,968,494	56%	1,340	43%	11/3/20 11:36:53 AM	11/3/20 11:36:53 AM	11/3/20 11:36:53 AM	11/3/20 11:36:53 AM	11/3/20 11:36:53 AM	11/3/20 11:36:53 AM	11/3/20 11:36:53 AM	11/3/20 11:36:53 AM	11/3/20 11:36:53 AM
392,682	55.1%	43.6%	2,971,368	2,351,209	2,979,379	6%	60,448	93%	11/3/20 11:04:54 AM	11/3/20 11:04:54 AM	11/3/20 11:04:54 AM	11/3/20 11:04:54 AM	11/3/20 11:04:54 AM	11/3/20 11:04:54 AM	11/3/20 11:04:54 AM	11/3/20 11:04:54 AM	11/3/20 11:04:54 AM
397,262	55.0%	43.6%	2,968,494	2,353,206	2,979,427	52%	1,097	44%	11/3/20 11:01:57 PM	11/3/20 11:01:57 PM	11/3/20 11:01:57 PM	11/3/20 11:01:57 PM	11/3/20 11:01:57 PM	11/3/20 11:01:57 PM	11/3/20 11:01:57 PM	11/3/20 11:01:57 PM	11/3/20 11:01:57 PM
436,823	54.8%	43.9%	2,979,379	2,386,765	2,979,427	28%	33,539	85%	11/3/20 10:59:27 PM	11/3/20 10:59:27 PM	11/3/20 10:59:27 PM	11/3/20 10:59:27 PM	11/3/20 10:59:27 PM	11/3/20 10:59:27 PM	11/3/20 10:59:27 PM	11/3/20 10:59:27 PM	11/3/20 10:59:27 PM
436,911	54.8%	43.9%	2,979,427	2,386,804	2,979,427	55%	48	44%	11/3/20 10:47:08 PM	11/3/20 10:47:08 PM	11/3/20 10:47:08 PM	11/3/20 10:47:08 PM	11/3/20 10:47:08 PM	11/3/20 10:47:08 PM	11/3/20 10:47:08 PM	11/3/20 10:47:08 PM	11/3/20 10:47:08 PM
441,186	54.7%	43.9%	2,976,329	2,388,681	2,976,329	72%	2,947	44%	11/3/20 10:33:22 PM	11/3/20 10:33:22 PM	11/3/20 10:33:22 PM	11/3/20 10:33:22 PM	11/3/20 10:33:22 PM	11/3/20 10:33:22 PM	11/3/20 10:33:22 PM	11/3/20 10:33:22 PM	11/3/20 10:33:22 PM
485,791	54.3%	44.3%	2,978,785	2,430,205	2,978,785	6%	41,525	93%	11/3/20 10:21:21 PM	11/3/20 10:21:21 PM	11/3/20 10:21:21 PM	11/3/20 10:21:21 PM	11/3/20 10:21:21 PM	11/3/20 10:21:21 PM	11/3/20 10:21:21 PM	11/3/20 10:21:21 PM	11/3/20 10:21:21 PM
568,345	54.2%	44.5%	3,018,043	2,477,914	3,018,043	100%	47,708	58%	11/3/20 10:08:53 PM	11/3/20 10:08:53 PM	11/3/20 10:08:53 PM	11/3/20 10:08:53 PM	11/3/20 10:08:53 PM	11/3/20 10:08:53 PM	11/3/20 10:08:53 PM	11/3/20 10:08:53 PM	11/3/20 10:08:53 PM
571,106	54.2%	44.5%	3,019,539	2,479,142	3,019,539	54%	1,211	45%	11/3/20 09:59:27 PM	11/3/20 09:59:27 PM	11/3/20 09:59:27 PM	11/3/20 09:59:27 PM	11/3/20 09:59:27 PM	11/3/20 09:59:27 PM	11/3/20 09:59:27 PM	11/3/20 09:59:27 PM	11/3/20 09:59:27 PM
575,573	54.2%	44.5%	3,021,961	2,481,130	3,021,961	54%	1,988	44%	11/3/20 09:47:08 PM	11/3/20 09:47:08 PM	11/3/20 09:47:08 PM	11/3/20 09:47:08 PM	11/3/20 09:47:08 PM	11/3/20 09:47:08 PM	11/3/20 09:47:08 PM	11/3/20 09:47:08 PM	11/3/20 09:47:08 PM
576,129	54.2%	44.5%	3,022,262	2,481,377	3,022,262	54%	217	44%	11/3/20 09:33:22 PM	11/3/20 09:33:22 PM	11/3/20 09:33:22 PM	11/3/20 09:33:22 PM	11/3/20 09:33:22 PM	11/3/20 09:33:22 PM	11/3/20 09:33:22 PM	11/3/20 09:33:22 PM	11/3/20 09:33:22 PM
890,798	52.6%	46.1%	3,098,560	2,715,658	3,098,560	53%	110	46%	11/3/20 09:21:21 PM	11/3/20 09:21:21 PM	11/3/20 09:21:21 PM	11/3/20 09:21:21 PM	11/3/20 09:21:21 PM	11/3/20 09:21:21 PM	11/3/20 09:21:21 PM	11/3/20 09:21:21 PM	11/3/20 09:21:21 PM
915,452	52.4%	46.3%	3,099,697	2,738,854	3,099,697	5%	23,196	94%	11/3/20 09:08:53 PM	11/3/20 09:08:53 PM	11/3/20 09:08:53 PM	11/3/20 09:08:53 PM	11/3/20 09:08:53 PM	11/3/20 09:08:53 PM	11/3/20 09:08:53 PM	11/3/20 09:08:53 PM	11/3/20 09:08:53 PM
920,844	52.3%	46.4%	3,096,601	2,747,272	3,096,601	57%	8,417	156%	11/3/20 08:56:56 PM	11/3/20 08:56:56 PM	11/3/20 08:56:56 PM	11/3/20 08:56:56 PM	11/3/20 08:56:56 PM	11/3/20 08:56:56 PM	11/3/20 08:56:56 PM	11/3/20 08:56:56 PM	11/3/20 08:56:56 PM
920,979	52.3%	46.4%	3,096,672	2,747,334	3,096,672	71	3	46%	11/3/20 08:41:23 PM	11/3/20 08:41:23 PM	11/3/20 08:41:23 PM	11/3/20 08:41:23 PM	11/3/20 08:41:23 PM	11/3/20 08:41:23 PM	11/3/20 08:41:23 PM	11/3/20 08:41:23 PM	11/3/20 08:41:23 PM
929,739	52.3%	46.4%	3,101,253	2,751,399	3,101,253	52%	4,215	46%	11/3/20 08:27:57 PM	11/3/20 08:27:57 PM	11/3/20 08:27:57 PM	11/3/20 08:27:57 PM	11/3/20 08:27:57 PM	11/3/20 08:27:57 PM	11/3/20 08:27:57 PM	11/3/20 08:27:57 PM	11/3/20 08:27:57 PM
942,166	52.2%	46.5%	3,101,811	2,763,107	3,101,811	4%	11,708	94%	11/3/20 08:16:54 AM	11/3/20 08:16:54 AM	11/3/20 08:16:54 AM	11/3/20 08:16:54 AM	11/3/20 08:16:54 AM	11/3/20 08:16:54 AM	11/3/20 08:16:54 AM	11/3/20 08:16:54 AM	11/3/20 08:16:54 AM
944,790	52.2%	46.5%	3,103,180	2,764,327	3,103,180	52%	1,220	47%	11/3/20 08:04:50 AM	11/3/20 08:04:50 AM	11/3/20 08:04:50 AM	11/3/20 08:04:50 AM	11/3/20 08:04:50 AM	11/3/20 08:04:50 AM	11/3/20 08:04:50 AM	11/3/20 08:04:50 AM	11/3/20 08:04:50 AM
965,263	52.2%	46.5%	3,113,867	2,773,847	3,113,867	52%	10,687	46%	11/3/20 07:59:44 PM	11/3/20 07:59:44 PM	11/3/20 07:59:44 PM	11/3/20 07:59:44 PM	11/3/20 07:59:44 PM	11/3/20 07:59:44 PM	11/3/20 07:59:44 PM	11/3/20 07:59:44 PM	11/3/20 07:59:44 PM
059,144	51.8%	46.9%	3,138,637	2,841,739	3,138,637	707	640	47%	11/3/20 07:36:55 PM	11/3/20 07:36:55 PM	11/3/20 07:36:55 PM	11/3/20 07:36:55 PM	11/3/20 07:36:55 PM	11/3/20 07:36:55 PM	11/3/20 07:36:55 PM	11/3/20 07:36:55 PM	11/3/20 07:36:55 PM
068,493	51.7%	47.0%	3,137,411	2,852,192	3,137,411	(1,226)	10,453	112%	11/3/20 07:25:23 AM	11/3/20 07:25:23 AM	11/3/20 07:25:23 AM	11/3/20 07:25:23 AM	11/3/20 07:25:23 AM	11/3/20 07:25:23 AM	11/3/20 07:25:23 AM	11/3/20 07:25:23 AM	11/3/20 07:25:23 AM
086,774	51.6%	47.1%	3,140,775	2,866,871	3,140,775	18%	14,679	80%	11/3/20 07:13:18 PM	11/3/20 07:13:18 PM	11/3/20 07:13:18 PM	11/3/20 07:13:18 PM	11/3/20 07:13:18 PM	11/3/20 07:13:18 PM	11/3/20 07:13:18 PM	11/3/20 07:13:18 PM	11/3/20 07:13:18 PM
094,579	51.6%	47.1%	3,144,803	2,870,547	3,144,803	4,027	3,676	47%	11/3/20 07:01:57 PM	11/3/20 07:01:57 PM	11/3/20 07:01:57 PM	11/3/20 07:01:57 PM	11/3/20 07:01:57 PM	11/3/20 07:01:57 PM	11/3/20 07:01:57 PM	11/3/20 07:01:57 PM	11/3/20 07:01:57 PM
104,416	51.6%	47.2%	3,149,879	2,881,284	3,149,879	5,076	10,738	109%	11/3/20 06:50:53 PM	11/3/20 06:50:53 PM	11/3/20 06:50:53 PM	11/3/20 06:50:53 PM	11/3/20 06:50:53 PM	11/3/20 06:50:53 PM	11/3/20 06:50:53 PM	11/3/20 06:50:53 PM	11/3/20 06:50:53 PM

Pennsylvania

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Trump Votes — Biden

EXHIBIT “R”



Susan Voyles
6750 Rivers springs Court
Sandy Springs, GA 30328

Thank you for your willingness to serve and support Fulton County Department of Voter Registration and Elections. Our mission and goal is to consistently provide professional and quality election services to the citizen voters located throughout Fulton County Georgia. Your participation and support as a poll manager has enabled our department to collectively accomplish this end.

As you may be aware, Georgia Election Code gives authority to the superintendent to appoint poll managers. This authority to appoint is for each primary and election in which the poll manager serves. Therefore, poll managers are not automatically tenured to a position or polling location for elections and must be reappointed by the superintendent as is required by Georgia Election Code for each election event.

There are many factors (management skills, performance, actions, behavior, etc.) considered prior to making reappointments for each primary or election. Unfortunately, a decision has been made to not reappoint you in a poll management or other poll positions in Fulton County.

Should you have questions or need additional information in this regard, please feel free to contact this office at 404-612-7033.

Best regards,

Dwight Brower
Elections Consultant
Fulton County Department of
Registration and Elections

cc: Richard Barron, Director
Nadine Williams, Elections Chief
Johnny Harris, Elections Officer
Marie Wright, Coordinator

EXHIBIT “S”



December 16, 2020

Bridget Thorne
1195 Seale Drive
Alpharetta GA 30022

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Dwight Brower
Elections Consultant
Fulton County Department of
Registrations and Elections

cc: Richard Barron, Director
Nadine Williams, Elections Chief
Johnny Harris, Elections Officer
Cynthia Floyd-Thomas, Coordinator

EXHIBIT “T”

On Aug 21, 2020, at 9:54 AM, Brower, Dwight
<Dwight.Brower@fultoncountyga.gov> wrote:

Hello Ms. Thorne,
Thank you for your response and concerns. Paramount was a sub of Happy Faces. So I have no contact for that agency. I was pressed back into service a week or so ago from retirement after Blake Evans took another position outside of the county.
Would love to discuss the possibility of you perhaps doing some instructing of poll workers for us. Let me know if you are interested.

Sent from my iPhone

On Aug 21, 2020, at 9:29 AM, Bridget Thorne

EXHIBIT “U”



SECRETARY RAFFENSPERGER CONDEMNS POLITICAL FIRING, CALLS FOR REHIRING OF FULTON COUNTY WHISTLE BLOWERS

(ATLANTA) - Secretary of State Brad Raffensperger is condemning the firing of poll managers and whistle blowers Suzi Voyles and Bridget Thorne by Fulton County elections officials and is calling on Fulton County to rehire them to work future elections. Voyles and Thorne raised concerns about the execution of the November elections.

"I condemn in the strongest terms the decision by Fulton County elections officials to fire two poll managers purely for raising concerns about the November elections," said Raffensperger. "Though we have found no credible evidence of widespread fraud, it is important that individuals can raise their voice when they believe they have seen wrongdoing. Retribution against whistle blowers poses a threat to the continued strength and vibrancy of our democracy."

Fulton County recently terminated poll workers Bridget Thorne and Suzi Voyles. Both individuals served as poll managers during the November elections and had done so in the past.

The Office of the Secretary of State has more than 250 open investigations related to elections in 2020, more than half of which relate to the November 2020 elections. Secretary Raffensperger has requested the assistance of staff from the Georgia Bureau of Investigation to help complete these investigations as quickly and thoroughly as possible. The Secretary has committed to investigating all credible allegations of elections-related issues.

Secretary Raffensperger has repeatedly called on the counties to ensure open access for poll watchers throughout the elections process. For example, counties were urged to make the audit-triggered hand recount open to the public, even beyond the ratio of observers agreed to by both the Republican and Democratic Party legal teams.

Additionally, the Office of the Secretary of State has sent out reminders to election workers that the absentee ballot signature verification process, like the rest of the elections process, needs to be open to public observation. Though elections workers need to be able to do their jobs effectively and efficiently, the Secretary has repeatedly stressed the importance of transparency throughout the process.

Georgia is recognized as a national leader in elections. It was the first state in the country to implement the practice of automatic voter registration, at least 16 days of early voting (which has been called the "gold standard"), and no-excuse absentee voting. Georgia continues to set records for voter turnout and election participation, seeing the largest increase in average turnout of any other state in the 2018 midterm election and record primary turnout in 2020, with over 1.1 million absentee by mail voters and over 1.2 million in-person voters utilizing Georgia's new, secure, paper ballot voting system.

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Key Election Dates and Information

Military and Overseas Voting

QUICK LINKS

Register to Vote

Where do I vote? (MVP)

2020 General Election

2020 General Recount

Risk-Linking Audit

Info by County

Risk-Linking Audit Public Notice

2020 Presidential Electors

GA Voter ID Info.

State Election Board

Elections Advisory Council

Secure The Vote

2019 Official Directory

Vote Safe

SAFE Commission

Voter Registration Drive

Stop Voter Fraud

Reexamination Costs

Online Complaints

Information for Voter Registrations Pending

Proposed Constitutional Amendments

Due to Citizenship

Great Seal

Intent to Tabulate Early Candidates

SD 4 Qualified

Candidates

Vote - Students/ Educators

Advance Voting Info.

Check Your Provisional Ballot Status for November 6, 2018 Election

2019 List Maintenance

FAQs