

MAY 14, 2021 01:15 PM


Cathelene Robinson, Clerk
Fulton County Superior Court

SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

GARLAND FAVORITO, <i>et al.</i> ,)	
<i>Petitioners,</i>)	
v.)	CIVIL ACTION FILE NO:
)	2020CV343938
MARY CAROLE COONEY, <i>et al.</i> ,)	
<i>Respondents</i>)	

**MOTION AND INCORPORATED BRIEF OF AMICUS CURIAE
FILIPINO LATINO ASIAN MOVEMENT FOR EMPOWERMENT
IN SUPPORT OF PETITIONER’S MOTION TO UNSEAL PAPER BALLOTS AND
COMPEL PRODUCTION OF BALLOTS**

Amicus Curiae, Filipino Latino Asian Movement for Empowerment (*hereinafter* “FLAME”), hereby moves this Honorable Court and submits the following incorporated Brief of Amicus Curiae in support of Petitioner’s Motion to Unseal Paper Ballots and Compel Production of Ballots (*hereinafter* the “Motion”).

A. INTERESTS OF *AMICUS CURIAE*.

FLAME is a national non-profit coalition of citizens dedicated to public interest issues that affect the growing Filipino, Latino, and Asian communities of the United States. It is a firm belief of FLAME that civic engagement is necessary and desirable to ensure that issues important to members of the Filipino, Latino and Asian communities are addressed by elected officials. This can only happen when members of these communities believe that their voices matter and their votes count.

Unfortunately, issues of election integrity that have marred this county’s discourse over the past seven months have shaken the confidence of many voters within the Filipino, Latino and Asian communities. When people don’t have confidence in the results of an election they stay home and don’t vote, thereby negatively impacting the ability to influence political discourse. FLAME believes that access to data and investigation of the original ballots is the best way to

restore confidence in elections going forward. FLAME believes that access and scrutiny will prove definitively whether or not fraudulent ballots were cast and counted in the November 2020 election.

Accordingly, it is essential that this Honorable Court GRANT the Petitioners' Motion. Members of the Filipino, Latino and Asian communities—and indeed all Americans of all ethnic groups—can have confidence that elections in the United States of America and in Georgia are free, fair, transparent only if the Petitioners' Motion is granted. No voter should be disenfranchised by illegal votes, and elections in this country and this state must remain a model for the rest of the world to aspire to.

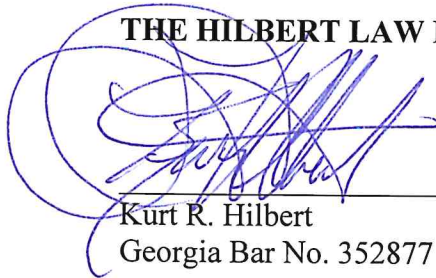
**B. FLAME FULLY ADOPTS AND ENDORSES THE BRIEF OF AMICUS CURIE
TEA PARTY PATRIOTS FOUNDATION, INC.**

The brief of *amicus curiae* Tea Party Patriots Foundation, Inc. details and encapsulates the position of FLAME such that forensic inspection of the original ballots should be ordered by this Honorable Court. In the interest of judicial economy, your humble *amicus* will not repeat arguments that have already been made before this Court. FLAME formally adopts and ratifies the brief of *amicus curiae* Tea Party Patriots Foundation, Inc. in its entirety.

WHEREFORE, Filipino Latino Asian Movement for Empowerment as *amicus curiae* respectfully advocates to this Honorable Court that access to the original ballots is mandated by law, consistent with strong public policy, and is the best evidence to determine authenticity of the ballots. The Court's granting of the Motion to Unseal the Ballots will be an important step to restore the public's faith in elections in this great State of Georgia.

Respectfully submitted, this 14th day of May, 2021.

THE HILBERT LAW FIRM, LLC



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CERTIFICATE OF SERVICE

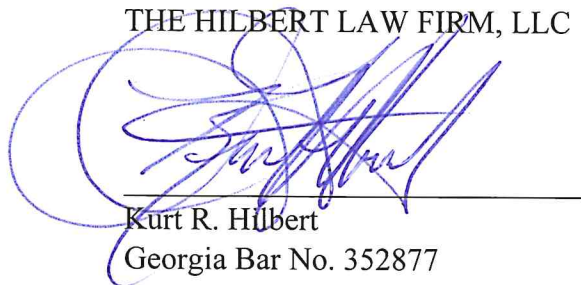
I hereby certify that I have this 14th day of May, 2021 electronically filed the foregoing MOTION AND INCORPORATED BRIEF OF AMICUS CURIAE FILIPINO LATINO ASIAN MOVEMENT FOR EMPOWERMENT IN SUPPORT OF PETITIONER'S MOTION TO UNSEAL PAPER BALLOTS AND COMPEL PRODUCTION OF with the Clerk of Court using the electronic filing system, which will send notification of such filing to all parties of record via electronic notification, as well as via email to the following counsel for the parties:

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Dated: May 14, 2021.

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