



March 11, 2022

Dear County Election Officials,

I am writing to inform you of two critical concerns regarding the conduct of the 2022 primaries. First, a group of legislators and voters have filed a [complaint](#) and [emergency temporary injunction](#) to stay the Secretary of State's (SOS) implementation of the cloud-based voting registration system known as GARvis. This planned implementation not only presents severe control and security issues but it also violates Georgia laws. Specifically, we believe the planned system implementation:

- Violates election privacy laws
- Violates competitive bid practices
- Exceeds the authority given to the SOS by the General Assembly for voter registration systems

The legal citations for these charges are shown in the complaint and more complainants will likely be added. We urge all counties not to participate in this cloud-based voter registration scheme until the legal issues can be resolved for the benefit of the legislators, voters and competing vendors who have been harmed.

In addition, I want to reiterate that the U.S. District Court has found that the Dominion Democracy Suite 5.5 system purchased for Georgia violates two Georgia status. In October, 2020 Judge Totenberg [found](#) in the *Curling v. Raffensperger* case that the system does not produce an elector verifiable ballot and the voter's choices are not in human readable text as required by law. [Pg 81-82]

This week we also [released](#) preliminary results from our year-long ballot image analysis. We believe our [15-point analysis](#) clearly proves that nearly all ballot images used to tabulate the November 2020 Fulton County election results were [electronically manipulated prior to results certification](#).

Given these horrendous elections conditions, we are making counties aware that the superintendent and county commissioners have other options under Georgia code to conduct a verifiable, legal election in their counties. Since the Georgia voting system is now clearly "impracticable" from a legal and security perspective at this time, the superintendent of each county may implement voting by paper ballot under [O.C.G.A. § 21-2-334](#).

In addition, county commissioners have the authority to implement an optical scan system in lieu of the unsecure ballot marking devices for recording and computing the vote at elections held in the county. This authority can be exercised at any regular meeting or special meeting called for that purpose under [O.C.G.A. § 21-2-366](#).

If you are thinking about soliciting advise from the office of the Secretary of State in these matters think again. The U.S. District Court has already found the office as "not credible" in their other scathing August 2019 [order](#). [pg70] Therefore, we urge all county election officials to consult with your county attorneys on what are the best options for your voters. If you have questions please don't hesitate to call me.

Sincerely,  
Garland Favorito  
Co-founder





*Voters Organized for Trusted  
Election Results in Georgia*