

I, Cathy A. Latham, declare the following pursuant to 28 U.S.C. § 1746 based on my information, knowledge, and belief.

1. I am a registered voter in the State of Georgia and have been a resident of Coffee County since 1993.

2. My background is in public education where I have been a full time public school teacher for 32 years. Currently, I am employed as a high school teacher with the State of Georgia as a virtual teacher. The subjects that I teach are AP subjects including microeconomics, macroeconomics, psychology, and European history. Two years ago, the Georgia Council on Economic Education named me the Georgia Economics Teacher of the Year.¹

3. I graduated from Baylor University with a degree in Secondary Education and full majors in History, and English. I also have a Master's in Education and a Master's in Public Administration with a concentration in Finance from Troy University.

4. I am an active member of the Republican Party in Georgia where until June 2021, I serve as the Rural County Chair responsible for oversight and assistance to county party activities in 129 rural counties in Georgia. I also served until June 2021 as the Chairwoman for the Coffee County Republican Party, and I

¹ <https://douglasnow.com/index.php/community/item/6456-coffee-high-s-cathy-latham-selected-2019-georgia-economics-teacher-of-the-year>

served as the First Vice Chair of the 12th Congressional District Republican Committee.

5. My first interaction in the actual administration of elections was in the General Election Cycle of 2016 and when I became the Chair of Coffee County in 2017.

6. Since that time, I have been actively involved in the administration of the election process itself concerning several federal, state, and local races, including primaries, elections, and runoff elections. In that capacity, I have served as a poll watcher, an observer, and as an adjudicator of ballots to determine voter intent by serving on Voter Review Boards. I have spoken with and continue to speak with various county election officials before, during, and after the election cycles to work on disseminating information to our members and the public, answering important questions, and verifying the integrity of the process.

7. During the Senate run-off elections in January 2021, I served as a Republican observer and Voter Review Panelist during the counting of the votes after the polls closed.

8. During early voting, the Elections Supervisor of Coffee County informed me that at the Douglas Precinct, one of the Dominion ImageCast Precinct Optical Scanners (ICP) failed to read advance voting ballots and was sealed by the Elections Director and a member of the Board of Elections. The Dominion tech

determined that it was probably the failure of one of the memory cards. The decision was made to run these ballots on Election Day when absentee ballots would be scanned, which would be after the polls closed. It was estimated that there were 6,000 ballots that would need to be scanned in addition to the absentee ballots and the UOCAVA ballots (Uniformed and Overseas Citizens Absentee Voting Act Ballots) and any provisional ballots. All these ballots would be scanned on the one ImageCast Central Scanner (ICC) on election night after the polls closed.

9. In the scanning room were three people: Misty Hampton, Coffee County Election Supervisor, Ernestine Thomas-Clark, representative for the Democratic Party, and me as the representative of the Republican Party. Everyone else either was in the lobby looking in through the windows into the scanning room or were in the other room opening the absentee ballots.

10. As everyone settled in for a long night in a very small room with a tabulation computer, Ms. Hampton began pulling batches to begin scanning. As she put in the first batch, the machine began scanning and then jammed on a ballot with the following screen message: QR CODE Failure.

11. This continued, batch after batch, time after time. Dominion tech, Samuel Challandes from Colorado, was an extra tech assigned to Coffee County after scanner issue problems in the June 2020 Primary and November 3

Presidential Election, and the machine recount. Mr. Challandes recommended to Ms. Hampton that she needed to take a cloth and wipe down the scanner. At times he advised and instructed her to blow canned air at the eye of the scanner to help remove paper debris. This didn't help.

12. One thing that was noticed by Ms. Hampton, Mrs. Thomas-Clark, and me was that every ballot that had a QR Code Failure was a ballot for all three Republican candidates: David Perdue, Kelly Loeffler, and Bubba McDonald. At some point during the evening of this, Mrs. Thomas-Clark looked over at me and said, "This isn't right." I agreed with her.

13. Several tries, wipes, and blows of air were used and smaller and smaller batches were being put through the machine. Eventually we were running 5-10 ballots at a time, trying to get through the stacks. The hours were stretching into a possibility of going into the next day. We only had approximately 5,800 ballots but it was taking forever since there was at least one ballot per small batch that would be rejected as a QR CODE FAILURE.

14. Sometime around 10:30 pm Eric Chaney, the Board of Elections Chairman, lost his temper and told Mr. Challandes to get his boss on the phone immediately. Mr. Challandes got his boss, Scott Tucker of Dominion, on his phone, Mr. Chaney asked for the phone to be put on speaker, and he proceeded to tell the Scott Tucker that Mr. Challandes had about 30 minutes to fix the scanner

so that it would take the ballots, or he (Mr. Chaney) was calling all news agencies and inviting them into the board office and have them film and witness what was going on with the scanners and the ballots. Mr. Tucker then asked if this was a threat and Mr. Chaney responded that no, it was a promise. Mr. Challandes then took the phone off speaker and proceeded to walk outside of the building to continue his conversation with Scott Tucker. Mr. Challandes came back in about 30 minutes later and was smiling saying that he knew that this was going to work, and we'd soon be finished.

15. Mr. Challandes then stood next to the scanner but did not touch the scanner at any point during this time. In his hand, he held his cell phone, which was a smart phone. While standing next to the scanner, he instructed Ms. Hampton to wipe the machine down one more time. She balked at doing it as she had been doing this same procedure all night long, without resolution. Mr. Challandes started grinning and said that this time it would work and there would be no more problems. Ms. Hampton one more time wiped the machine down and then inserted another batch of ballots. Mr. Challandes kept insisting this was going to work and he was bouncing on his toes, getting excited. Ms. Hampton was getting mad and told him to settle down and he continued to say that this was going to work. I even chimed in and asked him to be quiet and told him he was getting on everyone's nerves.

16. Ms. Hampton ran that batch (a large batch that Mr. Challandes insisted on running) and the last 5 batches, and sure enough, all ballots processed.

17. After Mr. Challandes left the room and we were finishing the wrap up and getting final numbers for the press, Mr. Chaney asked, "Did we all just witness what I think we witnessed?" I looked at him and said, "Is there anyway that something was downloaded to that scanner from his phone or from the Internet? There is no way that wiping the machine with a cloth stopped QR Code Failure readings." Ms. Hampton agreed that something happened because that was too coincidental to have not been a download or technical fix to the machine. Mrs. Thomas-Clark looked at me and said again, "This isn't right." The scanner that all night long had rejected Republican ballot after ballot with QR Code Failure was allegedly fixed with a phone call and a wipe of a cloth.

All the statements above are made to the best of my knowledge, information, and belief under penalty of perjury.

Dated: August 27, 2021


Cathy A. Latham