

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

SHAWN STILL, in his capacity as a Voter and
capacity as an Official Presidential Elector,
JANE DOE 1,
 Petitioner,

vs.

BRAD RAFFENSPERGER, in his official
capacity as Secretary of State of Georgia,
COFFEE COUNTY BOARD OF ELECTIONS
AND REGISTRATION, ERNESTINE
THOMAS-CLARK, in her official capacity as
Chairman of the Coffee County Board of
Elections and Registration, WENDELL STONE,
in his official capacity as vice-chairman of the
Coffee County Board of Elections and
Registration, ERIC CHANEY, in his official
capacity as a member of the Coffee County
Board of Elections and Registration,
MATTHEW MCCULLOGH, in his official
Capacity as a member of the Coffee County
Board of Elections and Registration, C.T.
PEAVY, in his official capacity as a member
of the Coffee County Board of Elections and
Registration, MISTY MARTIN, in her official
Capacity as Coffee County Election Supervisor,
JIL RIDLEHOOVER, in her official capacity as
Coffee County Elections Assistant,
CORPORATE ENTITY 1, JOHN DOE 1
 Respondents.

CIVIL ACTION FILE

NO. _____

VERIFIED PETITION FOR EMERGENCY INJUNCTIVE
AND DECLARATORY RELIEF

COMES NOW, Petitioner SHAWN STILL, in his capacity as a voter and Presidential Elector (*hereinafter*, “Petitioner”) and Jane Doe 1 (“Jane Doe”) (collectively “Petitioners”), by and through his undersigned counsel, and respectfully files this Verified Petition (*hereinafter*,

“Petition”) against Respondent BRAD RAFFENSPERGER, in his official capacity as Secretary of State of Georgia (*hereinafter*, “Respondent Raffensperger”), Respondent COFFEE COUNTY BOARD OF ELECTIONS AND REGISTRATION (*hereinafter*, “Respondent CCBOE”), CORPORATE ENTITY 1, and JOHN DOE 1 (collectively “Respondents”), alleging and showing this Honorable Court as follows:

PARTIES, JURISDICTION AND VENUE

1.

Petitioner Shawn Still is a resident of Georgia and an Official Presidential Elector.

2.

Petitioner Jane Doe 1 is a natural person believed to have a claim against the Respondents.

3.

Petitioners are “contestants” as defined by O.C.G.A. § 21-2-520(1) who is entitled to bring an election contest under O.C.G.A. § 21-2-521 (the “Election Contest”).

4.

Respondent BRAD RAFFENSPERGER, is named in his official capacity as Secretary of State of Georgia. Respondent Raffensperger serves as the Chairperson of Georgia’s State Election Board, which promulgates and enforces rules and regulations to (1) obtain uniformity in the practices and proceedings of election officials as well as legality and purity in all primaries and general elections, and (ii) be conducive to the fair, legal and orderly conduct of primaries and general election. O.C.G.A. §§ 21-2-30(d), 21-2-231, 21-2-33.1. Respondent Raffensperger, as Georgia’s chief elections officer, is also responsible for the administration of the Election Code. *Id.* Respondent Raffensperger is a state official subject to suit in his official capacity because his

office “imbues him with the responsibility to enforce the [election laws].” *Grizzle v. Kemp*, 634 F.3d 1314, 1319 (11th Cir. 2011). This Respondent may be served with summons and process upon General Counsel for the Georgia Secretary of State at 214 State Capitol, Atlanta, Georgia 30334 and with copies to the Corporations Division of the Secretary of State’s Office at 2 Martin Luther King, Jr., Dr., Suite 313 West Tower, Atlanta, GA 30334-1530. This Respondent is subject to the jurisdiction of this Court as a “Violator” as defined under the Elections Code.

5.

Respondent COFFEE COUNTY BOARD OF ELECTIONS AND REGISTRATION is charged to “promulgate[s] rules and regulations to define uniform and nondiscriminatory standards concerning what constitutes a vote and what will be counted as a vote for each category of voting system” in Georgia. O.C.G.A. § 21-2-31(7). This Respondent is also responsible for “formulat[ing], adopting, and promulgat[ing] such rules and regulations, consistent with law, as will be conducive to the fair, legal, and orderly conduct of primaries and elections.” *Id.* This Respondent may be served with summons and process through their Board of Commissioners Chairman Jimmy Kitchens and/or the County Attorney, Anthony A. Rowell, 206 South Coffee Avenue, Douglas, GA 31533. This Respondent is subject to the jurisdiction and venue of this Court.

6.

Respondents Ernestine Thomas-Clark, Wendell Stone, Eric Chaney, Matthew Mccullogh, C.T. Peavy, Misty Martin, Jil Ridlehoover are election officials appointed in Coffee County, Georgia. They may be served with summons and process in their official capacities as required by law.

7.

Respondent Corporate Entity 1 is a corporation believed to have liability in this matter. As the party is identified the party will be served.

8.

Respondent John Doe 1 is an individual believed to have liability in this matter. As the party is identified, the party will be served.

9.

This Court has jurisdiction over the subject matter of this action as it is an Election Contest and venue is proper as the actions and conduct that give rise to this Petition occurred in and the equitable relief sought in Coffee County. O.C.G.A. § 9-10-30 et seq. (All actions seeking equitable relief shall be filed in the county of the residence of one of the Respondents against who substantial relief is prayed.)

FACTS

10.

Coffee County, Georgia participated in the 2020 General Election, including holding a general election for President of the United States, for which President Donald J. Trump, former Vice President Joseph R. Biden, and Jo Jorgensen were the only candidates on the ballot for President in the election.

11.

The general election conducted in Coffee County, Georgia, was subject to and was required to adhere to, the election procedures set forth in the Georgia Election Code. O.C.G.A. § 21-2-1 et seq.

12.

Respondent Raffensperger serves as the Chairperson of Georgia's State Election Board, which promulgates and enforces rules and regulations to (1) obtain uniformity in the practices and proceedings of election officials as well as legality and purity in all primaries and general elections, and (ii) be conducive to the fair, legal and orderly conduct of primaries and general election. O.C.G.A. 21-2-30(d), 21-2-231, 21-2-33.1. Respondent Raffensperger, as Georgia's chief elections officer, is also responsible for the administration of the Election Code. *Id.*

13.

The CCBOE is charged to “promulgate[s] rules and regulations to define uniform and nondiscriminatory standards concerning what constitutes a vote and what will be counted as a vote for each category of voting system” in Georgia. O.C.G.A. § 21-2-31(7). CCBOE is also responsible for “formulat[ing], adopting, and promulgat[ing] such rules and regulations, consistent with law, as will be conducive to the fair, legal, and orderly conduct of primaries and elections.” *Id.*

14.

Coffee County, Georgia and the Respondent CCBOE were “given” deadlines, that do not exist in the Election Code, but that were “demanded” from Respondent Raffensperger concerning

certification of electronic recounts of the November 3, 2020 general election for President of the United States.

15.

Coffee County, Georgia, by and through Respondent CCBOE, were unable to certify the electronic recount election result numbers from the November 3, 2020 election.

16.

Coffee County, Georgia, by and through the Respondent CCBOE Chairperson Ernestine Thomas-Clark, sent a letter dated December 4, 2020 to Respondent Raffensperger informing him that Coffee County, Georgia was not able to repeatedly replicate or duplicate “credible” electronic recount election results and, thus, “cannot certify” the electronic recount numbers from the general election results from November 3, 2020 and stated they “should not be used.”

17.

A true and correct copy of the letter is attached hereto as **Exhibit “A”** and incorporated herein by reference.

18.

Coffee County, Georgia and the Respondent CCBOE were given deadlines, that do not exist in the Election Code, from Respondent Raffensperger of when certified results of the general election needed to be given to the Georgia Secretary of State’s office. That arbitrary deadline was December 4, 2020.

19.

Respondent CCBOE felt extreme pressure and undue influence from Respondent Raffensperger to meet his arbitrarily set deadline and to meet his specific demand to certify electronic recounts of the November 3, 2020 election results.

20.

Respondent CCBOE, in an abundance of caution, and to meet Respondent Raffensperger's demanded deadline to "certify" election results, Respondent CCBOE voted to certify the election results *only* from the raw votes from the November 3, 2020 election night itself and tendered that result to the Secretary of State's Office as the so-called "certification."

21.

Respondent CCBOE further stated in the same letter to Respondent Raffensperger that "To demand certification of patently inaccurate results neither serves the objective of the electoral system nor satisfies the legal obligation to certify the electronic recount."

22.

Coffee County, Georgia and the Respondent CCBOE through their letter to Respondent Raffensperger further informed him that "NO local election board has the ability to reconcile anomalies reflected in the attached." *See* Ex. A.

23.

There are 159 local Election Boards in the State of Georgia, each one was "demanded" by Respondent Raffensperger to certify the electronic recounts and tender those certified electronic recounts to the Secretary of State's office on or before December 4, 2020.

24.

The CCBOE letter calls into doubt the procedures, repeatability, dependability, creditability and the “patently inaccurate” results of “electronic recount number certifications” throughout the entire State of Georgia in each of the 159 counties, and concludes that each and every local Election Board could not possibly certify their results to “satisf[y] the legal obligation to certify the electronic recount.”

25.

The results of an election, here Coffee County, Georgia, may be set aside when there is “any error in counting the votes or declaring the result of the primary or election, if such error would change the results” (O.C.G.A. § 21-2-522) or “place in doubt the result” (*Id.*) and where there is “clearly established a violation of election procedures and has demonstrated that the violation has placed the result of the election in doubt.” *Martin v. Fulton Cty Bd. Of Registration & Elections*, 307 Ga. 193-94, 835 S.E.2d 245, 248 (2019).

26.

An unknown quantity of registered voters for President Donald J. Trump were denied the ability to vote in the 2020 presidential election because they were told they were not registered. See Exhibit B attached hereto and incorporated by reference.

27.

The inclusion of registered voters that were precluded from voting, will only further add to the vote totals. This is an unknown quantity further placing the election results in doubt. See Affidavits attached hereto as **Exhibit “B”**.

28.

The raw election results from the night of November 3, 2020 did not and could not be matched to the results of the electronic recount as declared by Respondent CCBOE in their letter to Respondent Raffensperger.

29.

The tabulated electronic recount in Coffee County revealed discrepancies between the Election Day results, Hand Recount, Electronic Recount which triggered a CCBOE investigation.

30.

The CCBOE investigation initially revealed that 185 ballots had not been run, so those ballots were re-run.

31.

After CCBOE re-ran those 185 ballots through the electronic recount system, there was “No change in Vote Count Despite 185 Ballots Added.” *See* Ex. A.

32.

The CCBOE inquired with the onsite representative for the electronic system, but the representative “could not explain why the system would not update the votes.”

33.

The electronic system representative then “directed the Board of Elections to make a decision about what to do.” *See* Ex. A.

34.

The CCBOE also found from their investigation “FOR SOME REASON NO WRITE-IN COLUMN PRINTED ON THE RECOUNT SUMMARY. **THERE WAS NO EXPLANATION OR SOLUTION TO THIS PROBLEM.**” (Caps and bolding in original). *See* Ex. A.

35.

Upon information and belief, the electronic system representative inquired with Respondent Raffensperger or his staff and was directed to inform Respondent CCBOE to “make a decision” and ignore the discrepancies.

36.

The CCBOE voted to certify the election night results because there was an “irreconcilable difference in vote count which leaves the Board with no guidance as to which count to certify.”

37.

The failure of the raw election night vote results to match the electronic recount results, on a repeated basis, and the inability of Respondent CCBOE to “reconcile the anomalies” establishes a *per se* error in the counting the votes as contemplated by (O.C.G.A. § 21-2-522).

38.

Th CCBOE data shows that election night results matched the hand recount results, but neither the election night results or the hand recount matched the electronic recount.

39.

The electronic recount anomalies in Coffee County, Georgia are “sufficient to change the outcome” of the election in Coffee County, Georgia, and “place in doubt the result.”

40.

The electronic recount anomalies in Coffee County, Georgia are “sufficient to change the outcome” of the election in the entire State of Georgia and “place in doubt the result,” as Respondent CCBOE has stated to the Respondent Secretary of State that “NO local election board has the ability to reconcile the anomalies...” which *per se* places in doubt the certified results of the electronic recounts and election results of each and every Election Board in each of the 159 counties of the State of Georgia.

41.

The disparity in votes between President Donald J. Trump and former Vice President Joseph Biden is currently 11,779 votes based on the public website of Respondent Raffensperger.

42.

Simple math shows that if the percentage discrepancy in Coffee County is extrapolated across 159 counties, the disparity in votes between the two (2) main candidates is undermined and the outcome of the election in Georgia potentially renders President Donald J. Trump as winner which triggers Section 5 of O.C.G.A. § 21-2-522 “For any other cause which shows that another was the person legally nominated, elected ...in a[n]...election.” *See* attached Affidavit by Benjamin Overholt attached hereto and incorporated by reference.

43.

The Election Code “allows elections to be contested through litigation, both as a check on the integrity of the election process and as a means of ensuring the fundamental right of citizens to vote and to have their votes counted securely.” *Martin*, 307 Ga. at 194.

44.

The Georgia Supreme Court has made clear that “it [is] not incumbent upon [Petitioner] to show how...voters would have voted if their...ballots had been regular. [Petitioners] only ha[ve] to show that there were enough irregular ballots to place in doubt the result.” *Mead v. Sheffield*, 278 Ga. 268, 271, 601 S.E.2d 99, 101 (2004) (citing *Howell v. Fears*, 275 Ga. 627, 628, 571 S.E.2d 392, 393 (2002)).

45.

By information and belief, Respondent Raffensperger’s response to the public release of CCBOE’s letter was to send armed investigators to harass the members of the CCBOE.

46.

By information and belief, Respondent Raffensperger further ordered another recount in Coffee County to be conducted by high school seniors.

47.

By information and belief, at least some of the high schoolers were under the age of 18.

48.

It is declared to be the policy of the State of Georgia that it has a “responsibility to protect the integrity of the democratic process and to ensure fair elections for constitutional offices O.C.G.A. § 21-5-2.

49.

Speaking to the Atlanta Journal Constitution, Respondent Raffensperger said by and through his office that “[e]very other county was able to complete this task within the given time limits. In some cases, counties realized they made mistakes in scanning ballots and had to rescan,

or realized they neglected to scan some ballots and had to correct that error. But nonetheless, those counties completed the recount on time.”

50.

The rule of law applying to our most fundamental democratic election process cannot be disregarded in favor of public sentiment to simply move on or for purposes of speed. *Bush v. Gore*, 531 U.S. 98, 108 (2000).

51.

Because the outcome of the Contested Election is in doubt, Petitioner jointly and severally hereby contests Georgia’s November 3, 2020, election results for President of the United States in Coffee County, Georgia, and the entire State of Georgia (all 159 counties) pursuant to O.C.G.A. §§ 21-2-521 and 21-2-522 et seq.

**COUNT I:
ELECTION CONTEST
O.C.G.A § 21-2-521 et seq.
(All Respondents)**

52.

Petitioner incorporates paragraphs 1 – 51 above verbatim for purposes of this Count I, as though set forth fully herein.

53.

Respondents, jointly and severally, have violated the Constitution of the State of Georgia.

54.

Respondents, jointly and severally, have violated the laws of the State of Georgia.

55.

Respondents, jointly and severally, have violated the Election Code.

56.

Respondents, jointly and severally, have violated State Election Board Rules and Regulations.

57.

Respondents, jointly and severally, have violated the basic tenants of an open, free, and fair election.

58.

The Contested Election has been timely and appropriately contested per O.C.G.A. § 21-2-522 et seq.

59.

As a direct and proximate result of Respondents' actions, the Contested Election is fraught with irregularities, misconduct and fraud sufficient to change the outcome of the election in Coffee County, Georgia, and place in doubt the entire election result in State of Georgia.

60.

Due to the actions and failures of Respondent Secretary of State, many illegal votes were accepted, cast, and counted in the Contested Election, and legal votes were rejected.

61.

The fraud, misconduct, and irregularities that occurred under the "supervision" of Respondents are sufficient to change the purported results of the Contested Election.

62.

The fraud, misconduct, and irregularities that occurred under the "supervision" of Respondents are sufficient to place the Contested Election in doubt.

63.

Respondent Raffensperger's misconduct is sufficient to change the purported results in the Contested Election in President Trump's favor.

64.

Respondents' misconduct is sufficient to place the purported Contested Election results in doubt.

65.

Respondents, jointly and severally, erred in counting the votes in the Contested Election.

66.

Respondents' error in counting the votes in the Contested Election would change the result in President Trump's favor.

67.

Respondents, jointly and severally, erred in certifying the election results from election night after performing the recount.

68.

Respondents were aware the vote counts taken after recount were incorrect.

69.

Respondent CCBOE vote counts were not capable of being duplicated or replicated.

70.

Respondent Raffensperger's negligent, intentional, willful, and/or reckless violations of the Georgia Constitution, Georgia law, as well as the fundamental premise of a free and fair

election created such error and irregularities at every stage of the Contested Election—from registration through certification and every component in between—that the outcome of the Contested Election is in doubt.

71.

As a result, there is sufficient evidence to call the result of the Contested Election into doubt as to the outcome of the Contested Election, and the Contested Election and any certification associated therewith shall be enjoined, vacated, and nullified and either a new presidential election be immediately ordered that complies with Georgia law or, in the alternative, that such other just and equitable relief is obtained so as to comport with the Constitution of the State of Georgia.¹ See O.C.G.A. § 21-2-522.

COUNT II:

RESPONDENTS' CERTIFICATION WAS INVALID AND MUST BE DECERTIFIED

(All Respondents)

72.

Petitioner incorporates paragraphs 1 – 71 above verbatim for purposes of this Count II, as though set forth fully herein.

73.

Respondents are required by statute to certify the results of the election.

¹ In the event this Court enjoins, vacates, and nullifies the Contested Election, the Legislature shall direct the manner of choosing presidential electors. U.S. art II, § 1; see also *Bush v. Gore*, 531 U.S. 98.

74.

When a recount is performed by statute, the county is required to certify the results of the recount.

75.

Respondent Raffensperger selected an arbitrary deadline for counties to certify their elections.

76.

Respondent CCBOE informed Respondent Raffensperger that its results from the statutory recount were not capable of being duplicated or replicated.

77.

Respondent CCBOE informed Respondent Raffensperger that “NO” county could certify the results of the recount. (emphasis in original).

78.

Respondent Raffensperger still required Respondent CCBOE to certify the results of the recount.

79.

Respondent CCBOE recertified its election night vote totals after being unable to confidently certify the results of the recount.

80.

Respondent Raffensperger certified the State's election results knowing the numbers from Coffee County did not accurately reflect the results of the recount.

81.

Respondent Raffensperger has repeatedly stated that the certified results accurately reflect the state's vote totals.

82.

Respondent Raffensperger knew that statement to be false at the time he made it.

83.

The Office of the Secretary of State lied to the people of Georgia.

84.

Such a lie constitutes a fraud on the people of Georgia, including Petitioners.

85.

Such action by Respondent Raffensperger make him a "Violator" as defined under the Election Code.

86.

Because Respondent Raffensperger certified vote totals he knew to be inaccurate the December 7, 2020, certification is void.

87.

Petitioner seeks an injunction to decertify both the Coffee County, Georgia certification of the election results, and enjoin and decertify Respondent Raffesperger's State certification of the entire State of Georgia's 2020 Presidential election results.

COUNT III – DECLARATORY JUDGMENT
(All Respondents)

88.

Petitioner incorporates paragraphs 1 – 87 above verbatim for purposes of this Count III, as though set forth fully herein.

89.

Petitioner is insecure, uncertain and unsure of his legal rights, status and other legal relations with respect to the Contested Election and his ability to vote as a Presidential Elector in the State of Georgia.

90.

Petitioner seeks all relief under O.C.G.A. § 9-4-1 et seq, including injunctive relief, against Respondents to decertify both the Coffee County, Georgia certification of the election results, and enjoin and decertify Respondent Raffesperger's State certification of the entire State of Georgia's 2020 Presidential election results.

COUNT IV - INJUNCTIVE RELIEF
(All Respondents)

91.

Petitioner incorporates paragraphs 1 –90 above verbatim for purposes of this Count IV, as though set forth fully herein.

92.

Petitioner seeks an injunction, both equitable and statutory preliminary, interlocutory, and permanent, against Respondents to decertify both the Coffee County, Georgia certification of the election results, and enjoin and decertify Respondent Raffesperger’s State certification of the entire State of Georgia’s 2020 Presidential election results.

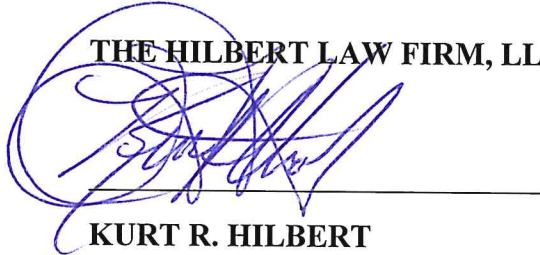
WHEREFORE, Petitioner prays for the following relief:

1. That process issue according to law and this Verified Petition be served upon all Respondents on an expedited basis;
2. That a *Rule Nisi* hearing on this matter be set *instanter*;
3. That the Court order expedited responses to discovery served with the Verified Petition see Exhibit “C” attached hereto for Petitioner’s Emergency Motion for Expedited Discovery and Discovery served herewith as Exhibits C-1, C-2, C-3;
4. That the Court issue a declaration to decertify both the Coffee County, Georgia certification of the 2020 Presidential election results, and enjoin and decertify Respondent Raffensperger’s State certification of the entire State of Georgia’s 2020 Presidential election results;
5. That equitable injunctive relief, including temporary restraining order, preliminary, interlocutory and permanent relief, be awarded in favor of Petitioner and against

- Respondents for any and all relief allowed as a matter of equity; and
6. For such other and further relief as this Honorable Court deems proper, just and equitable and as justice so requires.

Respectfully submitted, this 12th day of December, 2020.

THE HILBERT LAW FIRM, LLC



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**COFFEE COUNTY BOARD OF
ELECTIONS AND REGISTRATION**

Ernestine Thomas-Clark, Chairman
Wendell Stone, Vice-chairman
C.T. Peavy, Member

224 West Ashley Street
Douglas, GA 31533
(912) 384-7018
FAX (912) 384-1343
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Eric Chaney, Member
Matthew McCulloch, Member
Misty Martin, Election Supervisor
Jil Riddlehoover Elections Assistant

December 10, 2020

House Governmental Affairs Committee
Elections Investigative Hearing
Shaw Blackmon – Chairman
401 State Capitol
Atlanta, Ga. 30334

We want to thank the Governmental Affairs Committee for allowing the Coffee County Board of Election's to express its dilemma regarding certifying the electronic recount performed in the November 3, 2020 General Election. As you know, the certification process requires the Election Supervisor to swear under oath and under penalty of perjury that the certified votes are a true and accurate reflection of the count, or recount. In the instant case, the Election Supervisor of Coffee County could not honestly make such an attestation given the inherent inconsistencies existing within the electronic summary report generated by the Dominion voting system.

The basis for the dilemma is simple the election summary report for the electronic recount tabulated votes in a manner that resulted in more collective votes being cast for the Presidential candidates than the total number of votes reflected within the report. The inconsistent count could not be reconciled.

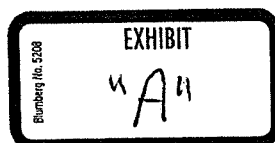
This fact (inherent inconsistency) alone was grounds not to certify the election based on the Dominion data set and report. However, the reluctance to certify the electronic recount was compounded where those results were considered in context with the two prior vote count results.

As this committee knows, a hand count of the original General Election balloting occurred on November 16 – November 17. Coffee County's hand count yielded one more ballot than was reflected on the ballot count on election night. At the direction of the Secretary of State, if the hand count yields a net vote difference of less than five votes, the board was instructed to certify the original vote tally. Coffee County certified on the original elections results on November 9, 2020.

The election report used to certify the original election results was internally consistent, meaning that the sum of the votes for each presidential candidate equaled the total votes reflected on the report. The hand count also yielded the same internal consistency within the report. See Exhibit 5. It is worth noting that we believe Dominion election reports generated in prior elections were likewise internally consistent. The internal inconsistency of the election summary report stands in stark contrast to all other prior elections.

To this application we have attached the following exhibits:

- Exhibit 1: Election Night Summary Report
- Exhibit 2: Recount Data



- Exhibit 3: Electronic Electron Summary Report
- Exhibit 4: Letter to Secretary of State
- Exhibit 5: Spreadsheet with results (corrected)
- Exhibit 6: Certification Form

Exhibit 5 is a spreadsheet that summarizes the discrepancies thus far described. A review of Exhibit 5 illustrates the two glaring problems presented to the Coffee County Board of Elections. The report relating to the recount is patently inaccurate on its face. Moreover, if one is to consider the electronic recount in light of the two prior vote counts, there is no way the vote tally reflected in that report could be accurate. It is not credible to accept that the original count and the hand count, under counted the total ballots by material number of ballots. Considering the inherent inconsistency of the electronic recount data, and its unlikely accuracy when compared to the first two vote counts, the Coffee County Board of Elections refused to certify the electronic recount based on the mandate of the certification form.

The decision not to certify the electronic recount was the result of a unanimous vote by Coffee County Board of Elections. However, this decision was not made until the Board could first have the data reviewed and explained by its Dominion representative. The data reflected in this statement was presented to the representative. He had NO explanation for the inaccuracies. He could not reconcile the electronic recount report data or explain how it so dramatically differed from the two prior counts. Knowing this decision would certainly be scrutinized, the Board sent a letter explaining its dilemma, its decision and the supporting spreadsheet to the Secretary of State. This letter was sent to Brad Raffensperger, on Friday, December 4, 2020.

That same day, the Election Supervisor also communicated directly with Chris Harvey, Director of Elections about the findings and the decision. No one could explain what was wrong or what to do. No one from the Secretary of State's office came to help the Board determine if it made an error or if the inaccuracies are Dominion software related.

This committee must understand, in this same election cycle, we identified other problems with the Dominion System and reported the same to the Secretary of State. On November 13, 2020 a letter was written to the Secretary of State identifying other serious concerns. A copy of that letter and other relevant documents are attached as Exhibit 7. Our Board members and Election Supervisor have called the Secretary of State's office to both report these issues as well as ask for help to address those problems. All our concerns and requests for help have fallen on deaf ears.

One can understand why today, December 10, 2020, our Board is dismayed to learn that the Secretary of State has opened an "investigation" into our handling of the recount. We learned this not from the Secretary of State but through WALB News where Chris Harvey provided a statement for the media. Mr. Harvey did not show us the courtesy of a phone call.

The same is true as relates to a video created at a Coffee County Board of Elections meeting which is now widely distributed via the internet. This video demonstrates how the Dominion system can be manipulated to alter existing ballot results or create voter ballots out of thin air. This security issue was first discovered by the Coffee County Board of Elections supervisor in June, 2020. It was made known to some but not all of the Board members. Importantly however, the findings were reported to our State Representative Dominic LaRiccica on or about June 10, 2020, with the hope that someone unassociated with Dominion would scrutinize this problem. The board never heard a word from Mr. LaRiccica or anyone from the Secretary of State's office or state government.

After the Presidential election was over, national attention focused on whether Dominion software could be manipulated to impact election results. Having previously demonstrated this fact, the full Board wanted to have this process documented during an open meeting. The video that captured this demonstration, along with other documents were requested to be produced via an Open Records Request. The content became public knowledge through this third-party request.


The Coffee County Board of Elections has for many months reported various aspects of these problems to the Secretary of State receiving no assistance in correcting these problems. As for the investigation, the Secretary of State chose not to assist us or help evaluate the root cause of the refusal to certify the election recount but certified the statewide election results despite our findings. The Coffee County Board of Elections took action which it believed accurately reflected the accurate vote of its citizens and certified that vote. If it has done so erroneously, it has been done, not nefariously or belligerently but honestly, humbly and with but one goal: to certify the true vote of the citizens of Coffee County.

This is particularly disappointing given that Eric Chaney personally called Chris Harvey and Dennis Carbone on November 13, 2020 to express his concerns over the Dominion System. Mr. Harvey nor Mr. Carbone returned this phone call. But the deafening silence from people in authority regarding our concerns go back to June 2020; their indifference is unfortunate.

As Exhibit 8 we have attached a list of individuals who, prior to Monday December 7, 2020, were made aware of some or all of the problems reflected in this statement. Not one person has offered any solution or explanation for these issues. The Secretary of State has been AWOL.

We look forward to our "investigation" which begins Friday. We stand ready to take any necessary action to correct any problems which are supported by the law and facts, even if we mistakenly erred in our decisions.

Respectfully,

A handwritten signature in black ink, appearing to be 'Eric Chaney', written over a horizontal line.

Eric Chaney
Coffee County Board Member

EXHIBIT LIST

1. Election night summary report
2. Hand recount election summary
3. Electronic recount ESR
4. Letter to Secretary State (Dec. 4th, 2020)
5. Spread sheet summary election results (correction)
6. Certification form
7. Letter to Secretary of State (Nov 11th, 2020)
8. People aware of problems prior to Monday Dec 7th, 2020

EXHIBIT 1

Election Summary Report

General Election

COFFEE

November 03, 2020

Summary for: All Contests, All Districts, All Tabulators, All Counting Groups

OFFICIAL AND COMPLETE

Precincts Reported: 6 of 6 (100.00%)

Registered Voters: 15,277 of 25,114 (60.83%)

Ballots Cast: 15,277

President of the United States (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Times Cast		3,754	9,574	1,936	13	15,277 / 25,114	60.83%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Donald J. Trump (I) (Rep)		2,587	7,066	917	8	10,578	
Joseph R. Biden (Dem)		1,100	2,411	995	5	4,511	
Jo Jorgensen (Lib)		41	67	17	0	125	
Total Votes		3,728	9,544	1,929	13	15,214	
		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Loren Collins	WRITE-IN	0	0	0	0	0	
Gloria La Riva	WRITE-IN	0	0	0	0	0	
Unresolved Write-In		10	12	1	0	23	

US Senate (Perdue) (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Times Cast		3,754	9,574	1,936	13	15,277 / 25,114	60.83%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
David A. Perdue (I) (Rep)		2,535	6,981	899	9	10,424	
Jon Ossoff (Dem)		1,067	2,298	913	3	4,281	
Shane Hazel (Lib)		85	155	46	0	286	
Total Votes		3,687	9,434	1,858	12	14,991	
		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Unresolved Write-In		5	8	1	0	14	

Public Service Commission District 4 (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Times Cast		3,754	9,573	1,933	13	15,273 / 25,114	60.81%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Lauren Bubba McDonald, Jr. (I) (Rep)		2,375	6,662	871	7	9,915	
Daniel Blackman (Dem)		1,008	2,156	910	3	4,077	
Nathan Wilson (Lib)		87	144	37	1	269	
Total Votes		3,470	8,962	1,818	11	14,261	
		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Unresolved Write-In		2	4	2	0	8	

US House District 12 (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Times Cast		3,754	9,574	1,936	13	15,277 / 25,114	60.83%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Rick W. Allen (I) (Rep)		2,483	6,909	916	7	10,315	
Liz Johnson (Dem)		1,054	2,247	938	4	4,243	
Total Votes		3,537	9,156	1,854	11	14,558	
		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Unresolved Write-In		1	3	0	0	4	

State Senate District 7 (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Times Cast		3,754	9,573	1,933	13	15,273 / 25,114	60.81%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Tyler Harper (I) (Rep)		2,948	7,790	1,216	7	11,961	
Total Votes		2,948	7,790	1,216	7	11,961	
		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Unresolved Write-In		54	166	51	0	271	

Sheriff (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

Times Cast	Election Day	Advanced Vot	Absentee by	Provisional	Total	
	3,754	9,573	1,933	13	15,273 / 25,114	60.81%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total
Doyle T. Wooten (I) (Rep)		3,058	8,018	1,396	9	12,481
Total Votes		3,058	8,018	1,396	9	12,481
Unresolved Write-In	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
	49	124	44	0	217	

Tax Commissioner (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

Times Cast	Election Day	Advanced Vot	Absentee by	Provisional	Total	
	3,754	9,573	1,933	13	15,273 / 25,114	60.81%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total
Shanda Henderson (I) (Rep)		3,132	8,175	1,412	9	12,728
Total Votes		3,132	8,175	1,412	9	12,728
Unresolved Write-In	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
	15	61	33	0	109	

Surveyor (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

Times Cast	Election Day	Advanced Vot	Absentee by	Provisional	Total	
	3,754	9,573	1,933	13	15,273 / 25,114	60.81%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total
Adam H. Evans (I) (Rep)		3,004	7,933	1,350	9	12,296
Total Votes		3,004	7,933	1,350	9	12,296
Unresolved Write-In	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
	18	66	26	0	110	

County Commission District 5 (Vote for 1) NP

Precincts Reported: 5 of 5 (100.00%)

Times Cast		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
		1,134	1,916	345	6	3,401 / 5,144	66.12%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Ted Osteen (I) (Rep)		946	1,604	255	1	2,806	
Total Votes		946	1,604	255	1	2,806	
Unresolved Write-In		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
		0	7	9	0	16	

Soil and Water - Altamaha (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

Times Cast		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
		3,754	9,573	1,933	13	15,273 / 25,114	60.81%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Total Votes		0	0	0	0	0	
Unresolved Write-In		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
		412	938	178	0	1,528	

Constitutional Amendment #1 (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

Times Cast		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
		3,754	9,573	1,933	13	15,273 / 25,114	60.81%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
YES		2,520	6,513	1,342	5	10,380	
NO		827	2,133	399	3	3,362	
Total Votes		3,347	8,646	1,741	8	13,742	
Unresolved Write-In		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
		0	0	0	0	0	

EXHIBIT 2

Hand Recount Recap

##### BATCH RESULTS #####												
Jurisdiction	Batch Name	Batch Type	Trump	Biden	Jorgensen	Invalid Write-In	Valid Write-In	Blank/Unde	Overvote			
COFFEE	1	Absentee By Mail	441	1	17	0	0	0	0			
COFFEE	2	Absentee By Mail	484	527	0	0	0	0	0			
COFFEE	3	Absentee By Mail	0	474	0	0	0	0	0			
COFFEE	10	Election Day	376	565	0	0	0	0	0			
COFFEE	11	Election Day	879	185	95	0	0	0	0			
COFFEE	12	Election Day	489	182	13	0	0	0	0			
COFFEE	13	Election Day	625	0	0	0	0	0	0			
COFFEE	14	Election Day	872	0	0	0	0	0	0			
COFFEE	15	Election Day	966	0	0	0	0	0	0			
COFFEE	16	Election Day	1071	430	0	0	0	0	0			
COFFEE	17	Election Day	0	0	0	23	0	0	0			
COFFEE	4	Election Day	393	8	0	0	0	0	0			
COFFEE	5	Election Day	1046	7	0	0	0	0	0			
COFFEE	6	Election Day	866	639	0	0	0	0	0			
COFFEE	7	Election Day	461	592	0	0	0	0	0			
COFFEE	8	Election Day	674	316	0	0	0	0	0			
COFFEE	9	Election Day	935	585	0	0	0	0	0			
Election Day			9653	3509	17	23		13202	Total Votes			
Absentee By Mail			925	1002	108			2035	Total Votes			

10578 4511 125 *
 This total did not include the additional ballot (15,237) based on SOS guidance. 15,237 *

EXHIBIT 3

Election Summary Report

General Election

COFFEE

November 03, 2020

Summary for: All Contests, All Districts, All Tabulators, All Counting Groups

OFFICIAL AND COMPLETE RECOUNT

Precincts Reported: 6 of 6 (100.00%)

Registered Voters: 15,327 of 25,114 (61.03%)

Ballots Cast: 15,327

President of the United States (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Times Cast		13,379	0	1,948	0	15,327 / 25,114	61.03%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Donald J. Trump (I) (Rep)		9,671	0	926	0	10,597	
Joseph R. Biden (Dem)		3,519	0	1,001	0	4,520	
Jo Jorgensen (Lib)		119	0	17	0	136	
Total Votes		13,309	0	1,944	0	15,253	
		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Loren Collins	WRITE-IN	0	0	0	0	0	
Gloria La Riva	WRITE-IN	0	0	0	0	0	
Unresolved Write-In		5	0	0	0	5	

US Senate (Perdue) (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Times Cast		13,379	0	1,948	0	15,327 / 25,114	61.03%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
David A. Perdue (I) (Rep)		9,525	0	906	0	10,431	
Jon Ossoff (Dem)		3,375	0	917	0	4,292	
Shane Hazel (Lib)		248	0	45	0	293	
Total Votes		13,148	0	1,868	0	15,016	
		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Unresolved Write-In		13	0	1	0	14	

Public Service Commission District 4 (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Times Cast		13,356	0	1,945	0	15,301 / 25,114	60.93%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Lauren Bubba McDonald, Jr. (I) (Rep)		9,037	0	873	0	9,910	
Daniel Blackman (Dem)		3,167	0	912	0	4,079	
Nathan Wilson (Lib)		237	0	38	0	275	
Total Votes		12,441	0	1,823	0	14,264	
		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Unresolved Write-In		6	0	2	0	8	

US House District 12 (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Times Cast		13,379	0	1,948	0	15,327 / 25,114	61.03%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Rick W. Allen (I) (Rep)		9,398	0	921	0	10,319	
Liz Johnson (Dem)		3,308	0	939	0	4,247	
Total Votes		12,706	0	1,860	0	14,566	
		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Unresolved Write-In		4	0	0	0	4	

State Senate District 7 (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Times Cast		13,356	0	1,945	0	15,301 / 25,114	60.93%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Tyler Harper (I) (Rep)		10,743	0	1,219	0	11,962	
Total Votes		10,743	0	1,219	0	11,962	
		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Unresolved Write-In		219	0	53	0	272	

Sheriff (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

		Election Day	Advanced Vot	Absentee by	Provisional	Total	
Times Cast		13,356	0	1,945	0	15,301 / 25,114	60.93%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Doyle T. Wooten (I) (Rep)		11,081	0	1,396	0	12,477	
Total Votes		11,081	0	1,396	0	12,477	
Unresolved Write-In		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Unresolved Write-In		173	0	46	0	219	

Tax Commissioner (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

		Election Day	Advanced Vot	Absentee by	Provisional	Total	
Times Cast		13,356	0	1,945	0	15,301 / 25,114	60.93%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Shanda Henderson (I) (Rep)		11,314	0	1,414	0	12,728	
Total Votes		11,314	0	1,414	0	12,728	
Unresolved Write-In		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Unresolved Write-In		76	0	35	0	111	

Surveyor (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

		Election Day	Advanced Vot	Absentee by	Provisional	Total	
Times Cast		13,356	0	1,945	0	15,301 / 25,114	60.93%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Adam H. Evans (I) (Rep)		10,944	0	1,352	0	12,296	
Total Votes		10,944	0	1,352	0	12,296	
Unresolved Write-In		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Unresolved Write-In		84	0	28	0	112	

County Commission District 5 (Vote for 1) NP

Precincts Reported: 5 of 5 (100.00%)

Times Cast		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
		3,066	0	350	0	3,416 / 5,144	66.41%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Ted Osteen (I) (Rep)		2,553	0	255	0	2,808	
Total Votes		2,553	0	255	0	2,808	
		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Unresolved Write-In		7	0	9	0	16	

Soil and Water - Altamaha (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

Times Cast		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
		13,356	0	1,945	0	15,301 / 25,114	60.93%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Total Votes		0	0	0	0	0	
		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Unresolved Write-In		1,350	0	178	0	1,528	

Constitutional Amendment #1 (Vote for 1) NP

Precincts Reported: 6 of 6 (100.00%)

Times Cast		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
		13,356	0	1,945	0	15,301 / 25,114	60.93%
Candidate	Party	Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
YES		9,041	0	1,342	0	10,383	
NO		2,961	0	399	0	3,360	
Total Votes		12,002	0	1,741	0	13,743	
		Election Day	Advanced Voting	Absentee by Mail	Provisional	Total	
Unresolved Write-In		0	0	0	0	0	

EXHIBIT 4

**COFFEE COUNTY BOARD OF
ELECTIONS AND REGISTRATION**

Ernestine Thomas-Clark, Chairman
Wendell Stone, Vice-chairman
C.T. Peavy, Member

224 West Ashley Street
Douglas, GA 31533
(912) 384-7018
FAX (912) 384-1343
E-Mail: misty-hampton@coffeecounty-ga.gov

Eric Chaney, Member
Matthew McCullogh, Member
Misty Martin, Election Supervisor
Jil Ridlehoover, Elections Assistant

12/04/2020

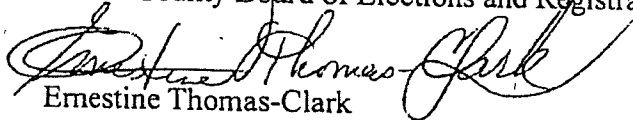
Brad Raffensperger
214 State Capitol
Atlanta, GA. 30334

Dear Mr. Raffensperger,

The Coffee County Board of Elections and Registration cannot certify the electronic recount numbers given its inability to repeatably duplicate creditable election results. Any system, financial, voting, or otherwise, that is not repeatable nor dependable should not be used. To demand certification of patently inaccurate results neither serves the objective of the electoral system nor satisfies the legal obligation to certify the electronic recount.

I am enclosing a spread sheet which illuminates that the electronic recount lacks credibility. NO local election board has the ability to reconcile the anomalies reflected in the attached. Accordingly, the Coffee County Board of Elections and Registration have voted to certify the votes cast in the election night report. The election night numbers are reflected in the official certification of results submitted by our office.

Respectfully,
Coffee County Board of Elections and Registration



Ernestine Thomas-Clark
Chairperson

Signed by Chairperson by expressed permission and consent of 100% of the board.

cc
Dominic LaRiccia
Tyler Harper

DISCREPENCIES IN THE NOVEMBER 3, 2020 GENERAL ELECTION AND RECOUNTS

Date	Activity	Action #	Trump	Biden	Jorgensen	Write-IN*	No Vote*	Total Votes	Internal Delta	Total Delta	Net Discrepancy Between Total and Internal
11/3/2020	Election Day 1	1	10578	4511	125	23	40	15237			
11/17/2020	Hand Recount	2	10578	4511	126	NA	NA	15238	+1	+1	0
	Compare 2 to 1		0	0	+1						
11/30/2020	Electronic Recount	3	10596	4518	13	0	15	15127			
	Compare 3 to 1		+18	+7	-112			-110	-87	-110	+23
	Compare 3 to 2		+18	+7	-112			-110	-88	-110	+22
11/30/2020	2nd uploaded 185 BALLOTS	4	NO CHANGE	NO CHANGE	NO CHANGE	0	74	NO CHANGE			
The tabulated Electronic Recount revealed the above discrepancies											
Investigation revealed we neglected to run 185 ballots: we then ran these ballots											
we reviewed the results but there was No Change in Vote Count Despite 185 Ballots Added											
The on Site Dominion Rep could not explain why system would not update votes											
The Dominion Rep directed the Board of Elections to make a decision about what to do.											
FOR SOME REASON NO WRITE-IN COLUMN PRINTED ON THE RECOUNT SUMMARY											
THERE WAS NO EXPLANATION OR SOLUTION TO THIS PROBLEM											
12/2/2020	Prepare to Certify	5	10597	4520	136			15236			
	Compare 5 to 1		+19	+9	+11			-1	+37	+16	+23
	Compare 5 to 2		+19	+9	+11			-2	+38	+16	+24
There is a discrepancy between Electronic Recount and total votes for both 1 & 2											
Stated Differently after 3 counts a clear inconsistency exists as one compares the original election counts, the hand recount, and the electronic recount.											
Anomalies in software recounts create irreconcilable difference in vote count which leaves the Board with no clear guidance as to which count to certify.											
* Write-IN and NO Votes are NOT included in the Total Votes											

EXHIBIT 5

DISCREPANCIES IN THE NOVEMBER 3, 2020 GENERAL ELECTION AND RECOUNTS

Date	Activity	Action #	Trump	Biden	Jorgensen	Write-IN*	Total Votes	Internal Delta
11/3/2020	Election Day 1	1	10578	4511	125	23	15237	
11/17/2020	Hand Recount	2	10578	4511	126	NA	15238	
	Compare 2 to 1		0	0	+1		+1	+1
11/30/2020	Electronic Recount	3	10597	4520	136	0	15258	
	Compare 3 to 1		+19	+9	+11			+39
	Compare 3 to 2		+19	+9	+12			+40
11/30/2020	2nd uploaded 185 BALLOTS	4	NO CHANGE	NO CHANGE	NO CHANGE	0	NO CHANGE	
	The tabulated Electronic Recount revealed the above discrepancies							
	Investigation revealed we neglected to run 185 ballots: we then ran these ballots							
	we reviewed the results but there was No Change in Vote Count Despite 185 Ballots Added							
	The on Site Dominion Rep could not explain why system would not update votes							
	The Dominion Rep directed the Board of Elections to make a decision about what to do.							
	FOR SOME REASON NO WRITE-IN COLUMN PRINTED ON THE RECOUNT SUMMARY							
	THERE WAS NO EXPLANATION OR SOLUTION TO THIS PROBLEM							
12/2/2020	Prepare to Certify	5	10597	4520	136	5	15258	
	Compare 5 to 1		+19	+9	+11			+39
	Compare 5 to 2		+19	+9	+12			+40
	There is a discrepancy between Electronic Recount and total votes for both 1 & 2							
	Stated Differently after 3 counts a clear inconsistency exists as one compares the original election counts, the hand recount, and the electronic recount.							
	Anomalies in software recounts create irreconcilable difference in vote count which leaves the Board with no clear guidance as to which count to certify.							
	* Write-IN and NO Votes are NOT included in the Total Votes							

EXHIBIT 6

CERTIFICATION OF RETURNS FOR:

NOVEMBER 3, 2020 GENERAL ELECTION RECOUNT

(COUNTY)

Instructions: Prepare and print 4 copies of the Election Summary for the General Election (county consolidated vote totals report that is generated by EMS). Attach copies of this consolidated certification report as follows:

1. White sheet is attached to Election Summary and returned to Secretary of State.
2. Yellow sheet is attached to Election Summary and maintained by Superintendent.
3. Pink sheet is attached to Election Summary and sent to Clerk of Superior Court.
4. Goldenrod sheet is attached to Election Summary and immediately posted at the Courthouse.

ELECTION SUMMARY MUST BE ATTACHED TO THIS FORM

We, the undersigned Superintendent/Supervisor of Elections and his/her Assistants, do jointly and severally certify that the attached Election Summary is a true and correct count of the votes cast in this County for the candidates in the General Election.

In TESTIMONY WHEREOF, We have hereunto set our hands and seals this _____ day of _____, 20_____. SIGNED IN QUADRUPLICATE.

Assistant

Assistant

Assistant

Assistant

Assistant

Superintendent/Supervisor Of Elections

EXHIBIT 7

**COFFEE COUNTY BOARD OF
ELECTIONS AND REGISTRATION**

Ernestine Thomas-Clark, Chairman
Wendell Stone, Vice-chairman
C.T. Peavy, Member

224 West Ashley Street
Douglas, GA 31533
(912) 384-7018
FAX (912) 384-1343
E-Mail: misty-hampton@coffeecounty-ga.gov

Eric Chaney, Member
Matthew McCulloch, Member
Misty Martin, Election Supervisor
Jill Riddlehoover, Elections Assistant

Brad Raffensperger
2 MLK Jr. Dr. S.E. Ste. 814
Floyd W Tower
Atlanta, Ga. 30334

November 11, 2020

Dear Mr. Raffensperger,

During the election conducted on 11/3/2020 the Coffee County Board of Elections and Registration discovered deficiencies in the current Dominion election system. We are writing to ensure you are aware of these and that they may be immediately rectified.

The adjudication process allows the ICC operator to choose how adjudication occurs, i.e. ambiguous marks, over vote, under vote, blank ballots, or ALL ballots. With the setting on "all ballots" we could adjudicate and change votes on all ballots, even if the ballot was correctly and cleanly voted. We believe a statewide standard would be appropriate.

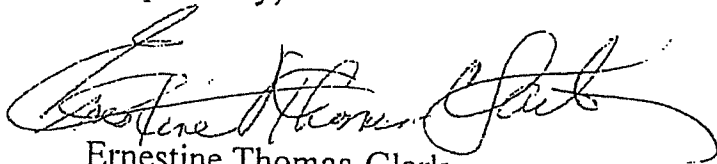
Using the old Diebold system, absentee ballots by mail that have errors would duplicate the voter's intent on a new ballot on all races possible. A representative from the Democratic and Republican Party plus a board member, would all agree on the marking or duplicating the ballot. We, also, all 3 sign the top tab of the ballot that we attach to the void ballot so that we may recreate the process and see who was making the changes. We have proof it was agreed by all.

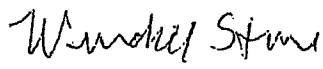
During the adjudication process with the Dominion system, no such trail can be created. This allows ANYONE to make a change to the vote so there

is no accountability. We also believe that the adjudication process may not be observed from any distance beyond that of the operator of the ICC. Given the computer screen it is not possible to observe the change being completed from any further distance.

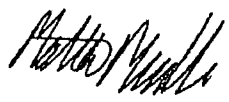
In a Mockup election we were able to count ballot multiple times. It was during this mockup election we have verified and recreated the above deficiencies

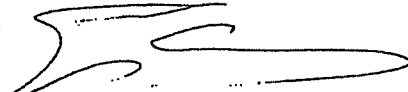
Respectfully,


Ernestine Thomas-Clark


Wendell Stone

Wendell Stone


Matthew McCullough

Eric Chaney 

Delivered by: Overnight and fax 404-656-0513

Transmission Log

Coffee Co Commission

Friday, 2020-11-13 16:28

9123840291

Date	Time	Type	Job #	Length	Speed	Fax Name/Number	Pgs	Status
2020-11-13	16:27	SCAN	09389	0:32	14400	814046560513	1	OK -- V.17 AB31

COFFEE COUNTY BOARD OF ELECTIONS AND REGISTRATION

Ernestine Thomas-Clark, Chairman
Wendell Stone, Vice-Chairman
C.T. Penny, Member

224 West Ashley Street
Douglas, GA 31533
(912) 384-7018
FAX (912) 384-1343
E-Mail: misty-hampton@coffeecounty-ga.gov

Eric Chincy, Member
Matthew McCullough, Member
Misty Martin, Election Supervisor
Jill Riddlehoover, Elections Assistant

Brad Raffensperger
2 MLK Jr. Dr. S.E. Ste. 814
Floyd W Tower
Atlanta, Ga. 30334

November 11, 2020

Dear Mr. Raffensperger,

During the election conducted on 11/3/2020 the Coffee County Board of Elections and Registration discovered deficiencies in the current Dominion election system. We are writing to ensure you are aware of these and that they may be immediately rectified.

The adjudication process allows the ICC operator to choose how adjudication occurs, i.e. ambiguous marks, over vote, under vote, blank ballots, or ALL ballots. With the setting on "all ballots" we could adjudicate and change votes on all ballots, even if the ballot was correctly and cleanly voted. We believe a statewide standard would be appropriate.

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During the adjudication process with the Dominion system, no such trail can be created. This allows ANYONE to make a change to the vote so there

[Track Another Package +](#)

Tracking Number: EJ475214345US

[Remove X](#)

Scheduled Delivery by

MONDAY

16 NOVEMBER 2020 ⓘ by **3:00pm** ⓘ

Delivery Attempt

November 14, 2020 at 10:09 am
Delivery Attempted - No Access to Delivery Location
30334

[Get Updates](#) ▾

Feedback

Text & Email Updates



Select what types of updates you'd like to receive and how. Send me a notification for:

Text

Email

- | | |
|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> All Below Updates |
| <input type="checkbox"/> | <input type="checkbox"/> Expected Delivery Updates ⓘ |
| <input type="checkbox"/> | <input type="checkbox"/> Day of Delivery Updates ⓘ |
| <input type="checkbox"/> | <input type="checkbox"/> Package Delivered ⓘ |
| <input type="checkbox"/> | <input type="checkbox"/> Available for Pickup ⓘ |
| <input type="checkbox"/> | <input type="checkbox"/> Delivery Exception Updates ⓘ |
| <input type="checkbox"/> | <input type="checkbox"/> Package In-Transit Updates ⓘ |

Proof of Delivery



EXHIBIT 8

The following 15 people have received calls or letters identifying the following cartological problems with the Dominion software and other issues.

1. The adjudication processes and the ability to manipulate votes
2. The absence of audit trail to identify who changed data in adjudication process and who witnessed to the adjudication of any given ballot.
3. Change by the SOS in the adjudication process changing the old system which required a rep from each party, plus a board member, to determine the voter's intent.

Under the Dominion adjudication process anyone can adjudicate change a vote with out any oversite or accountability from any neutral 3 party. A single ballot can be scanned and counted multiple times.

4. Multiple complaints and concerns have been logged over training, equipment failure and inexplicable software anomalies.

Secretary of State Brad Raffensperger

Gary Gainous _ Dominion Tech

Dominic LaRiccia – State House Representatives for Dist 169 6/10

Butch Miller – Senator 12/3

Mike Dugan – Senator 12/3

Steve Gooch – Senator 12/3

John Kennedy – Senator 12/3

Larry Walker – Senator 12/3

Dean Burke – Senator 12/3

Tyler Harper – Senator 12/3

Blake Tillery 12/3 & 12/4

Cardan Summers 12/3 & 12/8

Cathy Latham 12/7 & 12/8

Whitney Argenbright – Albany News - 12/7

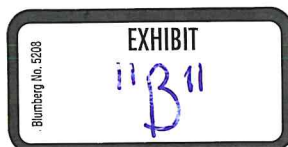
Robert Preston 12/7 & 12/8

Brad Schrade with AJC 12/8

AFFIDAVIT OF ALYSSA HOPE TAYLOR

Comes now, Alyssa Hope Taylor, and after being duly sworn makes the following statement under oath:

1. My name is Alyssa Hope Taylor.
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 am a resident of Coffee County, GA.
4. On multiple occasions I have tried to register to vote in Coffee County, GA.
5. On multiple occasions, my husband - who lives at the same address - also tried to register to vote in Coffee County, Ga.
6. Both my husband and I were denied the opportunity to register to vote.
7. I wished to vote for President Donald J. Trump in the 2020 Presidential Election.
8. My husband also wished to vote for President Donald J. Trump in the 2020 Presidential Election.
9. We were denied the opportunity to register to vote in Coffee County, GA.
10. We were denied the opportunity to vote.



11. I was told that I could not vote.

12. I was denied the opportunity to vote.

13. I was denied the opportunity to vote for President Donald J. Trump's re-election.

14. Upon information and belief there are other similarly situated eligible registered voters in Coffee County that were not allowed to register to vote.

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

Executed this 12th day of December, 2020.

Alyssa Taylor
Alyssa Hope Taylor

State of Georgia
County of Coffee

Appeared before me Alyssa Hope Taylor, this 12th day of December, 2020 and after being duly sworn, stated the foregoing statements are true and correct to the best of his knowledge and belief.

Robert Alexander Sinners

ROBERT ALEXANDER SINNERS
NOTARY PUBLIC
Fulton County
State of Georgia
My Comm. Expires December 7, 2024

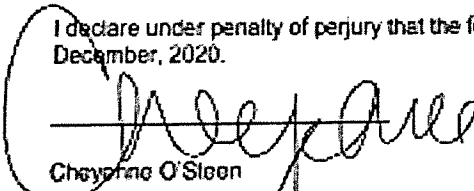
12/12/20

STATE OF GEORGIA
COUNTY OF COFFEE

Personally appeared before me, the undersigned officer duly authorized to administer oaths, **Cecilia O'Steen**, who, after having been sworn, deposes and says as follows:

1. My name is Cecilia Cheyenne O'Steen.
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 1414 GA HWY 64, NICHOLLS, GA 31554.
4. I am a resident of Coffee County.
5. I registered to vote when renewing my Driver's License on 3/13/2018.
6. My Driver's License incorrectly places my residence in Bacon County.
7. When attempting to vote in Coffee County on 10/30/2018, I was told I was registered in Bacon County.
8. I was not allowed to vote.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of December, 2020.


Cheyenne O'Steen

State of Georgia County of Coffee

Appeared before me ^{RAS} this 12th day of December, 2020 and after being duly sworn, stated the foregoing statements are true and correct to the best of his knowledge and belief.

12/12/20



ROBERT ALEXANDER SINNERS
NOTARY PUBLIC
Fulton County
State of Georgia
My Comm. Expires December 7, 2024

AFFIDAVIT OF APRIL MICHELLE MCCLAIN

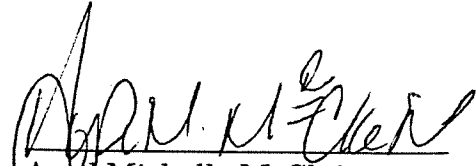
Comes now, April Michelle McClain, and after being duly sworn makes the following statement under oath:

1. My name is April Michelle McClain.
2. I am over the age of 18 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 am a resident of Coffee County, GA.
4. I registered to vote in Georgia on or about January 14, 2020.
5. I wished to vote for President Donald J. Trump in the 2020 Presidential Election.
6. I attempted to vote early in person in October, 2020.
7. I showed my driver's license to a female employee at the Coffee County Elections Office.
8. I was told by the female poll worker employee that I was not registered to vote.
9. I was told that I could not vote.
10. I was denied the opportunity to vote.
11. I was denied the opportunity to vote for President Donald J. Trump's re-election.

12. Upon information and belief there are other similarly situated eligible registered voters in Coffee County that were denied the opportunity to register or vote.

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

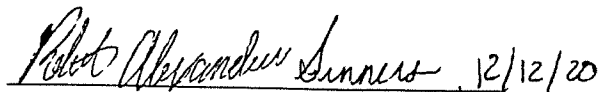
Executed this 12th day of December, 2020.


April Michelle McClain

State of Georgia
County of Coffee

Appeared before me April Michelle McClain, this 12th day of December, 2020 and after being duly sworn, stated the forgoing statements are true and correct to the best of his knowledge and belief.




Notary Public

My commission expires

ROBERT ALEXANDER SINNERS NOTARY PUBLIC Fulton County State of Georgia My Comm. Expires December 7, 2024

**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA**

**SHAWN STILL, in his capacity as a Voter and
capacity as an Official Presidential Elector,
JANE DOE 1,
 Petitioner,**

vs.

**BRAD RAFFENSPERGER, in his official
capacity as Secretary of State of Georgia,
COFFEE COUNTY BOARD OF ELECTIONS
AND REGISTRATION, ERNESTINE
THOMAS-CLARK, in her official capacity as
Chairman of the Coffee County Board of
Elections and Registration, WENDELL STONE,
in his official capacity as vice-chairman of the
Coffee County Board of Elections and
Registration, ERIC CHANEY, in his official
capacity as a member of the Coffee County
Board of Elections and Registration,
MATTHEW MCCULLOGH, in his official
Capacity as a member of the Coffee County
Board of Elections and Registration, C.T.
PEAVY, in his official capacity as a member
of the Coffee County Board of Elections and
Registration, MISTY MARTIN, in her official
Capacity as Coffee County Election Supervisor,
JIL RIDLEHOOVER, in her official capacity as
Coffee County Elections Assistant,
CORPORATE ENTITY 1, JOHN DOE 1
 Respondents.**

CIVIL ACTION FILE

NO. _____

PETITIONER'S EMERGENCY MOTION FOR EXPEDITED DISCOVERY

COMES NOW the Petitioner, Shawn Still, and moves pursuant to O.C.G.A. § 9-11-26, and as otherwise allowed by law and the Uniform Superior Court Rules, this Honorable Court for Expedited Discovery for good cause shown. Specifically, Petitioner requests that the Court require



Respondents to produce documents and testimony regarding facts surrounding the elections certification process in Coffee County, GA. See Petitioner's Request for Production of Documents, Requests for Admission, and Interrogatories, attached hereto as Exhibits C-1 and C-2. O.C.G.A. § 9-11-26; O.C.G.A. § 9-11-33, 9-11-34, and 9-11-36.

Petitioner is a designated Georgia Elector for the November 3, 2020 presidential election. Petitioner *must* complete discovery within 36 hours of this filing to discern election results for Coffee County, Georgia **in advance of December 14, 2020**, the date specified by federal statute for the vote of the Electoral College. ("The electors of President and Vice President of each State shall meet and give their votes on the first Monday after the second Wednesday in December next..."). 3 U.S.C. § 7. Petitioner cannot ascertain or perform his duty as a member of the Electoral College without completed discovery in this case. Accordingly, due to the extreme time constraint and based on the recent documentation that was discovered December 4, 2020, the need for expedited discovery is paramount to resolving the underlying Election Contest and determining the irregularities, misconduct and possible fraud in the Presidential Election that may be "sufficient" to change the outcome of the election, or place the result in doubt – not only in Coffee County, but also in the entire State of Georgia.

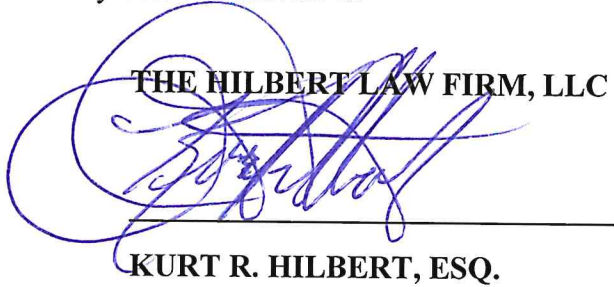
Further, Petitioner intends to file a motion to add parties and needs responses to this discovery to identify those parties and expeditiously proceed with the parties' addition and subsequent litigation.

A proposed Order granting this Motion is attached hereto as Exhibit C-3.

WHEREFORE, for the within and foregoing reasons, Petitioner Shawn Still's Motion for Expedited Discovery respectfully requests that its motion be **GRANTED** in the above captioned matter, and for such other and further relief as is just, proper and equitable.

Respectfully submitted this 12th day of December 2020.

THE HILBERT LAW FIRM, LLC



KURT R. HILBERT, ESQ.

Georgia Bar No. 352877
Attorney for Shawn Still
205 Norcross Street
Roswell, GA 30075
Georgia Bar No. 352877
T: (770) 551-9310
F: (770) 551-9311
khilbert@hilbertlaw.com

**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA**

**SHAWN STILL, in his capacity as a Voter and
capacity as an Official Presidential Elector,
JANE DOE 1,
 Petitioner,**

vs.

**BRAD RAFFENSPERGER, in his official
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COFFEE COUNTY BOARD OF ELECTIONS
AND REGISTRATION, ERNESTINE
THOMAS-CLARK, in her official capacity as
Chairman of the Coffee County Board of
Elections and Registration, WENDELL STONE,
in his official capacity as vice-chairman of the
Coffee County Board of Elections and
Registration, ERIC CHANEY, in his official
capacity as a member of the Coffee County
Board of Elections and Registration,
MATTHEW MCCULLOGH, in his official
Capacity as a member of the Coffee County
Board of Elections and Registration, C.T.
PEAVY, in his official capacity as a member
of the Coffee County Board of Elections and
Registration, MISTY MARTIN, in her official
Capacity as Coffee County Election Supervisor,
JIL RIDLEHOOVER, in her official capacity as
Coffee County Elections Assistant,
CORPORATE ENTITY 1, JOHN DOE 1
 Respondents.**

CIVIL ACTION FILE

NO. _____

**PETITIONER'S FIRST DISCOVERY REQUESTS
TO RESPONDENT COFFEE COUNTY BOARD OF ELECTIONS AND REGISTRATION
SERVED WITH THE VERIFIED PETITION**

COMES NOW Petitioner Shawn Still, in his Official Capacity as Presidential Elector and serves upon Respondent Coffee County Board of Elections and Registration (hereinafter the "Coffee County Board") the following Discovery requests pursuant to O.C.G.A. § 9-11-26, 9-11-33,



9-11-34, and 9-11-36, and as otherwise allowed by law.

Respondent Coffee County Board is requested to respond to the following discovery request by serving its responses upon the undersigned counsel for Petitioner within forty-five (45) days from the date of service of the discovery with the Complaint in conformance with the requirements of the Georgia Civil Practice Act, or on a more expedited basis as this Honorable Court may so direct and order.

DEFINITIONS

The Definitions set forth below are incorporated into this request and are to be carefully followed.

1. When used herein, the following terms shall have the meanings described below:
 - a. The “Contested Election” is defined as the 2020 Presidential Election Contest in Georgia concluding on November 3, 2020.
 - b. “Election Night” is defined as the evening of November 3, 2020, and the morning of November 4, 2020.
 - c. “Dominion” is defined as Dominion Voting Systems Corp.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1.

Produce copies of all election ballots for the 2020 Presidential Election in Coffee County, Georgia with redactions of only personal identifying information.

2.

Produce all recordings, videos, text messages, voicemails, emails, and communications of any kind and nature with any Dominion representative that participated in the recount of the ballots in the 2020 Presidential Election in Coffee County, Georgia.

3.

Produce all documentation evidencing who was deputized as an official election official in the 2020 Presidential Election in Coffee County, Georgia.

4.

Produce all documentation evidencing what rules, regulations or instructions (other than the Election Code), if any, that the Coffee County Board relied upon to conduct the recount concerning the 2020 Presidential Election in Coffee County, Georgia.

5.

Produce all documentation evidencing who was registered to vote in the 2020 Presidential Election in Coffee County, Georgia.

6.

Produce any and all documentation evidencing any provisional ballots in the 2020 Presidential Election in Coffee County, Georgia.

7.

Produce all documentation evidencing any and all provisional ballots that were counted in the 2020 Presidential Election in Coffee County, Georgia.

8.

Produce all documentation evidencing any and all provisional ballots that were not counted in the 2020 Presidential Election in Coffee County, Georgia.

9.

Produce all documentation evidencing any and all software and/or coding for the

Dominion machines that was provided to the Coffee County Board.

10.

Produce all documents and communications from other Georgia counties evidencing election irregularities regarding the Contested Election.

11.

Produce all documents and communications with the Office of the Secretary of State of Georgia concerning irregularities with vote counts and recounts concerning the Contested Election.

INTERROGATORIES

1.

If the Coffee County Board's response to any Request for Admission contained in Petitioner's First Requests for Admission is anything other than an unqualified admission, state the factual basis for the response.

2.

Identify any representative(s), employees, contractors, and/or agents from Dominion who was/were present during the Coffee County Board's administration of the Contested Election and/or any recount related to the Contested Election.

3.

Identify any representative(s), employees, contractors, and/or agents from Dominion who was present during the Coffee County Board's electronic recount who did not provide an explanation for inaccuracies with the electronic recount for the Contested Election after being asked by agent(s) of the Coffee County Board for such explanation.

4.

Identify the representative from Dominion who informed agent(s) of the Coffee County Board that it had to make a decision regarding whether to submit electronic recount results or results from Election Night to the Georgia Secretary of State and state whether such individual contacted the Georgia Board of Elections or the Georgia Secretary of State's Office prior to making that comment.

5.

State whether any representatives from Dominion who were present during the Coffee County Board's administration of the Contested Election and/or during any vote counting for the Contested Election were deputized as election officials in connection with Georgia's 2020 General Election.

6.

Identify who found the 185 ballots that neglected to be counted initially in connection with Georgia's 2020 General Election.

7.

Identify if any the 185 ballots were either so-called "no-vote" ballots, or "write-in" ballots.

8.

Identify any and all facts that any person on the Coffee County Board has in their possession, custody or control that shows that "NO local election board has the ability to reconcile the anomalies reflected in" the spreadsheet attached to the letter dated December 4, 2020.

9.

Identify any and all conversations that any Coffee County Board official had with Secretary

Raffensperger or any of his employees, staff or agents concerning the 2020 Election recount anomalies and the content of such conversations and the date, time, and parties to said communications.

REQUESTS FOR ADMISSION

1.

Admit that venue in this action is proper as to the Coffee County Board.

2.

Admit that jurisdiction in this action is proper as to the Coffee County Board.

3.

Admit that jurisdiction in this action is proper as to the Secretary of State of Georgia Brad Raffensperger.

4.

Admit that venue in this action is proper as to the Secretary of State of Georgia Brad Raffensperger.

5.

Admit that Respondents have been properly served with process in this case, or have acknowledged service of process pursuant to O.C.G.A. § 9-11-4 et seq.

6.

Admit that all factual allegations in the Verified Petition are true and correct.

7.

Admit that all exhibits attached to the Verified Petition are true and correct copies.

8.

Admit that agents of the Coffee County Board were responsible for administering the Contested Election in Coffee County.

9.

Admit that agents of the Coffee County Board are responsible for totaling the number of votes in the Contested Election in Coffee County.

10.

Admit that agents of the Coffee County Board reported vote totals for the Contested Election in Coffee County to the Georgia State Elections Board on Election Night.

11.

Admit that on November 9, 2020, agents of the Coffee County Board certified the Coffee County Election Night results of the Contested Election.

12.

Admit that agents of the Coffee County Board conducted a hand recount of the votes cast in the Contested Election in Coffee County.

13.

Admit that agents of the Coffee County Board obtained vote totals resulting from a hand recount for the Contested Election in Coffee County on or around November 17, 2020.

14.

Admit that agents of the Coffee County Board compared vote totals resulting from a hand recount of the raw Election Night results for the Contested Election in Coffee County.

15.

Admit that agents of the Coffee County Board, to satisfy the demand of the Georgia Secretary of State, conducted an electronic recount of the votes cast in the Contested Election in Coffee County.

16.

Admit that agents of the Coffee County Board obtained vote totals from an electronic recount for the Contested Election in Coffee County on or around November 30, 2020.

17.

Admit that electronic recount did not match the raw Election Night results or the hand recount for the candidates running in the Contested Election.

18.

Admit that the electronic recount process for the Contested Election in Coffee County did not duplicate the election results for the Contested Election in Coffee County obtained on Election Night.

19.

Admit that the electronic recount process for the Contested Election in Coffee County had discrepancies in the totals.

20.

Admit that the electronic recount process for the Contested Election in Coffee County did not change the totals after 185 ballots were re-run that had not been counted previously.

21.

Admit that the electronic recount process for the Contested Election in Coffee County

produced inaccurate results that could not be repeatedly replicated.

22.

Admit that the electronic vote recount process used for the Contested Election in Coffee County produced a report with a summary showing that more votes were cast in the Contested Election in Coffee County than the total number of votes reflected in the report.

23.

Admit that the Coffee County Board was required to certify election results from the Contested Election by attaching the Elections Summary and certifying it is "a true and correct count of the votes cast" in Coffee County.

24.

Admit that on or about December 4, 2020, the Coffee County Board did not certify the results based on the electronic recount.

25.

Admit that on or about December 4, 2020, the Coffee County Board certified the same results of the Contested Election that it previously certified on November 9, 2020.

26.

Admit that on December 4, 2020, the Coffee County Board, sent the letter attached as Exhibit A to the Petition to the Office of the Georgia Secretary of State.

27.

Admit that the members of the Coffee County Board gave unanimous consent to send the letter attached as Exhibit A to the Petition to the Office of the Georgia Secretary of State.

28.

Admit that the onsite representative of Dominion during the electronic recount instructed the Coffee County Board to “make a decision” on the voting results.

29.

Admit that the onsite representative of Dominion during the electronic recount was not deputized by the Secretary of State of Georgia or any member of the Coffee County Board.

30.

Admit that the onsite representative of Dominion did not contact the Georgia Secretary of State before instructing the Coffee County Board to “make a decision” on the electronic vote recount.

31.

Admit that the Coffee County Board voted to certify the Election Night results only and submitted those results to the Georgia Secretary of State in place of or instead of the election recount results.

32.

Admit that Secretary Raffensperger certified the results of the Contested Election on December 7, 2020.

33.

Admit that a representative from Dominion could not explain the inconsistencies in the

electronic recount tabulations for the Contested Election.

34.

Admit that the Coffee County Board discovered deficiencies in the Dominion electronic election system prior to November 11, 2020.

35.

Admit that the Coffee County Board discovered prior to November 11, 2020, that operators using the Dominion electronic election system could change votes on valid ballots.

36.

Admit that the Coffee County Board discovered that operators using the Dominion electronic election system could change votes on valid ballots without the Dominion system recording evidence of the operator's identity.

37.

Admit that the Coffee County Board provided notice to Secretary Raffensperger on November 11, 2020 of the deficiencies discovered in the letter attached hereto as **Exhibit 1**.

38.

Admit that on or about December 12, 2020, Secretary Raffensperger along with armed election investigators traveled to Coffee County, Georgia and, without a warrant, began investigating the Coffee County, Georgia 2020 election results.

39.

Admit that on or about December 12, 2020, Secretary Raffensperger along with armed election investigators traveled to Coffee County, Georgia and, without a warrant, began investigating the Coffee County, Georgia 2020 election results.

40.

Admit that on or about December 12, 2020, Secretary Raffensperger along with armed election investigators and while in Coffee County, Georgia gathered and instructed high school students from, upon information and belief Citizens Cristian Academy, who were under the age of 18, to engage in another recount of the ballots of Coffee County, Georgia.

This 12th day of December, 2020.


THE HILBERT LAW FIRM, LLC

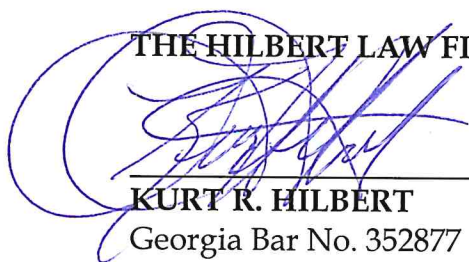
KURT R. HILBERT
Georgia Bar No. 352877
Attorney for Petitioner

205 Norcross Street
Roswell, Georgia 30075
T: (770) 551-9310
F: (770) 551-9311
E: khilbert@hilbertlaw.com

CERTIFICATE OF SERVICE

This is to certify that I have attached the foregoing **PETITIONER'S FIRST DISCOVERY REQUESTS TO RESPONDENT COFFEE COUNTY BOARD OF ELECTIONS AND REGISTRATION SERVED WITH THE VERIFIED PETITION** filed with the Superior Court of Coffee County on the same date as filing of the Verified Complaint, and this discovery shall be served upon Respondents simultaneously along with the Summons and Complaint upon Respondents in accordance with the Georgia Civil Practice Act.

This 12th day of December, 2020.


THE HILBERT LAW FIRM, LLC

KURT R. HILBERT
Georgia Bar No. 352877
Attorneys for Petitioner

The Hilbert Law Firm, LLC
205 Norcross Street
Roswell, Georgia 30075
T: (770) 551-9310
F: (770) 551-9311
E: khilbert@hilbertlaw.com

**COFFEE COUNTY BOARD OF
ELECTIONS AND REGISTRATION**

Ernestine Thomas-Clark, Chairman
Wendell Stone, Vice-chairman
C.T. Peavy, Member

224 West Ashley Street
Douglas, GA 31533
(912) 384-7018
FAX (912) 384-1343
E-Mail: misty-hampton@coffeecounty-ga.gov

Eric Chaney, Member
Mathew McCullough, Member
Misty Martin, Election Supervisor
Jill Riddlehoover, Elections Assistant

Brad Raffensperger
2 MLK Jr. Dr. S.E. Ste. 814
Floyd W Tower
Atlanta, Ga. 30334

November 11, 2020

Dear Mr. Raffensperger,

During the election conducted on 11/3/2020 the Coffee County Board of Elections and Registration discovered deficiencies in the current Dominion election system. We are writing to ensure you are aware of these and that they may be immediately rectified.

The adjudication process allows the ICC operator to choose how adjudication occurs, i.e. ambiguous marks, over vote, under vote, blank ballots, or ALL ballots. With the setting on "all ballots" we could adjudicate and change votes on all ballots, even if the ballot was correctly and cleanly voted. We believe a statewide standard would be appropriate.

Using the old Diebold system, absentee ballots by mail that have errors would duplicate the voter's intent on a new ballot on all races possible. A representative from the Democratic and Republican Party plus a board member, would all agree on the marking or duplicating the ballot. We, also, all 3 sign the top tab of the ballot that we attach to the void ballot so that we may recreate the process and see who was making the changes. We have proof it was agreed by all.

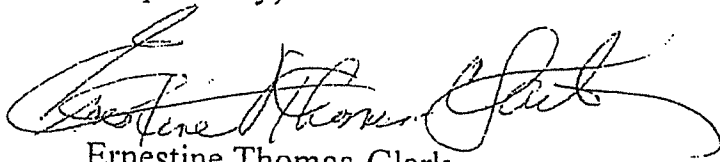
During the adjudication process with the Dominion system, no such trail can be created. This allows ANYONE to make a change to the vote so there




is no accountability. We also believe that the adjudication process may not be observed from any distance beyond that of the operator of the ICC. Given the computer screen it is not possible to observe the change being completed from any further distance.

In a Mockup election we were able to count ballot multiple times. It was during this mockup election we have verified and recreated the above deficiencies

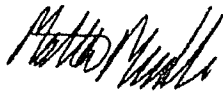
Respectfully,



Ernestine Thomas-Clark

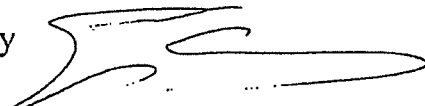


Wendell Stone



Matthew McCullough

Eric Chaney



Delivered by: Overnight and fax 404-656-0513

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

SHAWN STILL, in his capacity as a Voter and
capacity as an Official Presidential Elector,
JANE DOE 1,
 Petitioner,

vs.

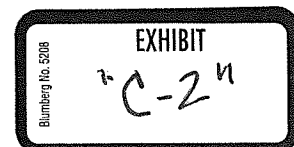
BRAD RAFFENSPERGER, in his official
capacity as Secretary of State of Georgia,
COFFEE COUNTY BOARD OF ELECTIONS
AND REGISTRATION, ERNESTINE
THOMAS-CLARK, in her official capacity as
Chairman of the Coffee County Board of
Elections and Registration, WENDELL STONE,
in his official capacity as vice-chairman of the
Coffee County Board of Elections and
Registration, ERIC CHANEY, in his official
capacity as a member of the Coffee County
Board of Elections and Registration,
MATTHEW MCCULLOGH, in his official
Capacity as a member of the Coffee County
Board of Elections and Registration, C.T.
PEAVY, in his official capacity as a member
of the Coffee County Board of Elections and
Registration, MISTY MARTIN, in her official
Capacity as Coffee County Election Supervisor,
JIL RIDLEHOOVER, in her official capacity as
Coffee County Elections Assistant,
CORPORATE ENTITY 1, JOHN DOE 1
 Respondents.

CIVIL ACTION FILE

NO. _____

PETITIONER’S FIRST DISCOVERY REQUESTS
TO RESPONDENT BRAD RAFFENSPERGER IN HIS OFFICIAL CAPACITY AS
SECRETARY OF STATE SERVED WITH THE VERIFIED PETITION

COMES NOW Petitioner Shawn Still, in his Official Capacity as Presidential Elector and serves upon Respondent Brad Raffensperger in his Official Capacity as Secretary of State of Georgia (hereinafter the “Secretary Raffensperger” or “Respondent”) the following Discovery



requests pursuant to O.C.G.A. § 9-11-26, 9-11-33 and 9-11-34 and as otherwise allowed by law.

Respondent is requested to respond to the following discovery request by serving his responses upon the undersigned counsel for Petitioner within forty-five (45) days from the date of service of the discovery with the Complaint in conformance with the requirements of the Georgia Civil Practice Act, or on a more expedited basis as this Honorable Court may so direct and order.

DEFINITIONS

The Definitions set forth below are incorporated into this request and are to be carefully followed.

1. When used herein, the following terms shall have the meanings described below:
 - a. The “Contested Election” is defined as the 2020 Presidential Election Contest in Georgia concluding on November 3, 2020.
 - b. “Election Night” is defined as the evening of November 3, 2020, and the morning of November 4, 2020.
 - c. “Dominion” is defined as Dominion Voting Systems Corp.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1.

Produce all recordings, videos, text messages, voicemails, emails, and communications of any kind and nature with any Dominion representative that participated in the recount of the ballots in the 2020 Presidential Election in Coffee County, Georgia.

2.

Produce all documentation evidencing who was deputized as an election official in the 2020 Presidential Election in Coffee County, Georgia.

3.

Produce all documents and communications from all Georgia counties evidencing election irregularities regarding the Contested Election.

4.

Produce all documents and communications with Coffee County, Georgia election officials concerning irregularities with vote counts and recounts concerning the Contested Election.

INTERROGATORIES

1.

Identify any and all conversations that any Coffee County Board official had with Secretary Raffensperger or any of his employees, staff or agents concerning the 2020 Election recount anomalies and the content of such conversations and the date, time, and parties to said communications.

2.

Identify all persons, their addresses, telephone numbers, and their ages who participated in the unofficial recount that took place at Citizens Christian Academy, in Coffee County, Georgia, or other school or facility used to count ballots on December 12, 2020.

This 12th day of December, 2020.

THE HILBERT LAW FIRM, LLC



KURT R. HILBERT

Georgia Bar No. 352877

Attorney for Petitioner

205 Norcross Street
Roswell, Georgia 30075
T: (770) 551-9310

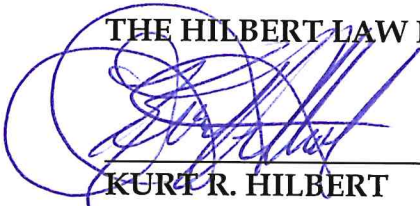
F: (770) 551-9311

E: khilbert@hilbertlaw.com

CERTIFICATE OF SERVICE

This is to certify that I have attached the foregoing **PETITIONER'S FIRST DISCOVERY REQUESTS TO RESPONDENT BRAD RAFFENSPERGER IN HIS OFFICIAL CAPACITY AS SECRETARY OF STATE SERVED WITH THE VERIFIED PETITION** filed with the Superior Court of Coffee County on the same date as filing of the Verified Complaint, and this discovery shall be served upon Respondents simultaneously along with the Summons and Complaint upon Respondents in accordance with the Georgia Civil Practice Act.

This 12th day of December, 2020.

THE HILBERT LAW FIRM, LLC


KURT R. HILBERT
Georgia Bar No. 352877
Attorneys for Petitioner

The Hilbert Law Firm, LLC
205 Norcross Street
Roswell, Georgia 30075
T: (770) 551-9310
F: (770) 551-9311
E: khilbert@hilbertlaw.com

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

SHAWN STILL, in his capacity as a Voter and
capacity as an Official Presidential Elector,
JANE DOE 1,
Petitioner,

vs.

BRAD RAFFENSPERGER, in his official
capacity as Secretary of State of Georgia,
COFFEE COUNTY BOARD OF ELECTIONS
AND REGISTRATION, ERNESTINE
THOMAS-CLARK, in her official capacity as
Chairman of the Coffee County Board of
Elections and Registration, WENDELL STONE,
in his official capacity as vice-chairman of the
Coffee County Board of Elections and
Registration, ERIC CHANEY, in his official
capacity as a member of the Coffee County
Board of Elections and Registration,
MATTHEW MCCULLOGH, in his official
Capacity as a member of the Coffee County
Board of Elections and Registration, C.T.
PEAVY, in his official capacity as a member
of the Coffee County Board of Elections and
Registration, MISTY MARTIN, in her official
Capacity as Coffee County Election Supervisor,
JIL RIDLEHOOVER, in her official capacity as
Coffee County Elections Assistant,
CORPORATE ENTITY 1, JOHN DOE 1
Respondents.

CIVIL ACTION FILE

NO. _____

PROPOSED ORDER GRANTING MOTION FOR EXPEDITED DISCOVERY

Upon consideration of Petitioner's Emergency Motion for Expedited Discovery in the above-captioned matter, the arguments and materials submitted by the parties and for good cause shown, Petitioner's Motion is hereby **GRANTED** in the above captioned matter, and it is **ORDERED** as follows:



1. Petitioner's Request for Production of Documents, Requests for Admission and Interrogatories are deemed properly served as of the date of service of the Motion.
2. Responses to Petitioner's Request for Production of Documents, Requests for Admission and Interrogatories shall be served and the documents to be produced pursuant thereto shall be made available for inspection and copying on or before 11:00 a.m. on December 14, 2020.

IT IS SO ORDERED this _____ day of December 2020.

Judge, _____
Superior Court of _____ County
State of Georgia

Submitted by:

Kurt Hilbert, Esq.
The Hilbert Law Firm, LLC
205 Norcross Street
Roswell, GA 30075
Georgia Bar No. 352877
T: (770) 551-9310
F: (770) 551-9311
khilbert@hilbertlaw.com

**IN THE SUPERIOR COURT OF FULTON COUNTY
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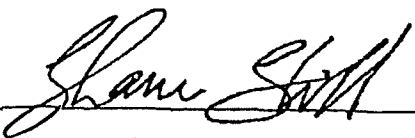
CIVIL ACTION FILE

NO. _____

VERIFICATION

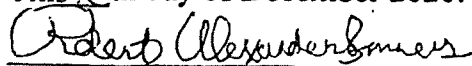
Personally appeared before me, the undersigned officer, duly authorized by law to administer oaths, came SHAWN STILL who is *sui juris*, of sound mind and body, and upon oath, does depose and say that he has reviewed the foregoing **VERIFIED PETITION FOR EMERGENCY INJUNCTIVE AND DECLARATORY RELIEF** with regard to the facts contained therein, and that the facts set forth therein are true and correct where derived from his own knowledge and are believed to be true and correct where derived from the knowledge of others, public information, or from documents that are maintained in the course of business.

This 12th day of December 2020.


By: Shawn Still

Sworn to and subscribed before me

This 12th day of December 2020.



NOTARY PUBLIC
ROBERT ALEXANDER SINNERS
Fulton County
State of Georgia
My Comm. Expires December 7, 2024