

Coffee County Board of Commissioners
101 Peterson Avenue S.
Douglas, Georgia 31513

Coffee County Board of Elections
224 W. Ashley Street
Douglas, Georgia 31513

Dear County Commissioners and Members of the Board of Elections:

For several months our county has received extensive attention from the media and other sources. The attention has not been favorable and, in fact, has portrayed our community in a most unfavorable light. The attention has left us with a "black eye" from which it will require considerable effort to recover. We have become known by a number of references including "crooked Coffee." The focus of this attention has centered around a series of breaches that occurred in our election office beginning on January 7, 2021. There were a series of breaches and they have been documented in the sworn testimony of a voting system computer expert in the case of Curling, et.al v. Raffensperger, et.al. U.S. District Court for the Northern District of Georgia. The expert's findings can be summarized as follows:

1. In 2021, the security of Georgia's voting system was breached in Coffee County on at least three different occasions: January 7, January 18-19, and January 25-29.
2. On January 7 individuals from a data collection firm, hired by Sidney Powell, travelled to the Coffee County Election office and copied data from much of the election hardware using forensic tools and techniques. At least seven individuals including one THEN Election Board member and the THEN election supervisor were concurrently in the Election Office;
3. On January 18-19 access to our election office was once again provided to unauthorized outside individuals including during certain times the office was closed to the public. During this visit, system dates on the central election computer were changed; scanner settings were reconfigured; over 6500 ballots were scanned; one precinct scanner was opened to inspect parts, and other unauthorized actions were taken.

4. During January 25-29 an outside individual was again given extraordinary improper access to Georgia's voting system in our election office. The individual had access over 5 days. He made changes, scanned ballots and was given voting system data to take with him.

The expert further states on oath, "The data collected includes protected software from almost every component of Georgia's election system."

Information surrounding the breaches has been available for months but nothing has been done in Coffee County to inform the public of what transpired, what corrective actions were taken and what measures have been implemented to ensure safe and secure elections in the future. If there is any doubt that our elections office was literally ransacked, I urge you to please examine Exhibit A which I am attaching to this letter. This exhibit is a memorandum prepared by Mr. Barnes who replaced Ms. Hampton. Please note the apparent complete disregard for the voters of our county and the utter disregard for voting system computer security.

In the expert's report he points out that an Elections Board member was allegedly present during the initial breach. On April 12, 2022, an e-mail was sent by a reporter from the Washington Post to the County Attorney, who as you know is also the Elections Board's attorney, seeking verification of certain information that had been provided to the reporter by Misty Hampton. Among the information that Ms. Hampton provided to the reporter about the questionable activities was that " ...Eric Chaney was present with her and she did nothing without his knowledge." After being presented the reporter's claims Mr. Chaney, through the Board's attorneys, provided a response to the news person in which he denies the claims made by Ms. Hampton. I have made a copy of Mr. Chaney's response and include it herein as Exhibit "B".

As we all know, later that year, videos were produced which did in fact dispute Mr. Chaney's denial. The attorneys for the county and board had these videos since they were created in January and February of 2021. You may also remember some of the videos, along with a story dealing with the breaches, appeared in the September 21, 2022, edition of Douglas Now. No public action was taken by either the Commissioners or the Board of Elections to remove Mr. Chaney even after it seemed clear that he was involved in the breach, referred to by Misty and the expert in Federal court. Instead, he was allowed to

resign supposedly because he was told a new legal interpretation required he reside in the district of the commissioner that appointed him and since he had moved out of that district he could not serve. He discussed this in his deposition in August 2022. As best I can determine the law that Mr. Chaney refers to is Resolution No. 2022-15. This law was not signed until October 3, 2022, some months after Mr. Chaney resigned. The law also pertains to "future appointments" and not situations where board members were already serving such as Mr. Chaney. I mention these specific situations involving Mr. Chaney because the Commissioners and the Elections Board have by their conduct condoned and approved of such actions. Let me explain my reasons for this position.

In August 2022, Mr. Chaney's deposition was taken, under oath, in the Curling case which is pending in federal court. At the time he was not a Board member. It is clear Mr. Chaney had no authority from the Board or Commissioners or the Secretary of State to participate in a breach which involved the copying of Georgia's statewide software, for which the state holds the license. Coffee has no authority to allow anyone to make copies of this proprietary security-sensitive software. However, there is evidence indicating Chaney did take part in the breach and guided Ms. Hampton. It is my opinion that the interests of Mr. Chaney and those of the Commissioners and Board of Elections in this legal matter are not aligned and in conflict. Despite the adverse interests of Chaney and the Commissioners and Elections Board, the Commissioners and the Board allowed and caused Hall Booth Smith, the attorneys for the County and the Board to represent Mr. Chaney at his deposition. Mr. Chaney was prepared for his deposition and guided through it by Hall Booth Smith. They advised him when to take the Fifth Amendment and protected him to avoid self-incrimination on the facts of the breaches, within the confines of the law. Of course, all individuals are entitled to legal representation to protect themselves from self-incrimination. But legal representation is guided by strict ethical codes that prohibit attorneys from representing parties whose interests may conflict. When the Hall Booth Smith attorneys were acting as the attorneys for the County and the Board of Elections in this matter, the interests of the county boards are to fully expose the facts, not protect improper unauthorized behavior by anyone. Representing both Mr. Chaney and the County appears to have created an untenable ethical conflict for Hall Booth Smith. It certainly seems that they should have informed the County officials and stepped aside for other non-conflicted counsel to step in.

In September 2022, Mr. Stone appeared on behalf of the Election Board for its deposition in the same case. He testified that he met with attorneys from Hall Booth Smith and prepared for his deposition. Again, Hall Booth Smith guided Mr. Stone through his deposition. I respectfully submit to you that the result of Hall Smith representing Mr. Chaney while at the same time representing Mr. Stone is that the County Commissioners and Board of Elections seem to have condoned whatever conduct Mr. Chaney may have participated in relative the alleged "breaches," and county officials have effectively advocated for Chaney and his activities through their own attorneys—all at Coffee County taxpayer expense, The result and conclusion is that in order to avoid the appearance of impropriety, an independent counsel should be called upon by the county officials to look into this situation and make appropriate recommendations.

Finally, there is one more situation that you need to be aware of which taints this situation. It can best be discussed beginning with a timeline:

1. On December 9, 2020, 5 individuals met at our election office. I am attaching Exhibit "C" which shows three of the individuals. I am told there were two other individuals in the office, Ms. Hampton and Mr. Chaney. The rest of the Board was not present. The question arises why was the Board's attorney and the County Attorney meeting with a single Board member along with Ed Voyles and Cathy Latham, who was the chairman of the local Republican Party and is currently the subject of an election-related criminal investigation;
2. Following the meeting on December 9, 2020, Mr. Chaney signed a letter on December 10 addressed to the Georgia House Governmental Affairs. A copy of that letter is attached as Exhibit "D";
3. On December 17, 2020, a lawsuit was filed in Fulton Superior Court seeking to set aside the results of the 2020 presidential election. The lawsuit was filed by a Fulton County voter by the name of Shawn Still. More about Mr. Still later. The lawsuit was filed against our Coffee Board of Elections naming the individual board members at the time. It claimed the Board Members violated State Election Board Rules and Regulations; that the Board violated the basic tenants

of an open, free and fair election; that because of the Board's actions the election in Coffee County was fraught with irregularities, misconduct, and fraud sufficient to change the outcome of the election. A copy of the letter written by Mr. Chaney was attached to the lawsuit as Exhibit "A." I am attaching a copy of portions of this lawsuit as Exhibit "E". It should be pointed out that while this suit was filed on December 17, it was sworn to on December 12, some two days after Mr. Chaney's letter.

So, who is Shawn Still and how did he happen to file a lawsuit in Fulton Superior Court suing our County Board of Elections? I will try and answer these important questions.

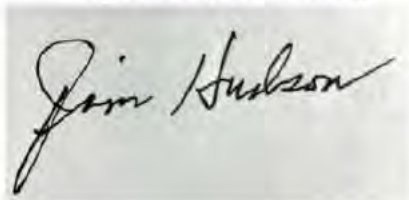
Mr. Still, a Fulton voter, was the person who filed the suit against Coffee Election Board members. Mr. Still testified before the January 6 committee in the U.S. Congress. In his testimony he informed the committee that he was encouraged to file this suit by two lawyers by the names of Alex Kaufmann and Brad Carver. Mr. Carver is a partner in the law firm of Hall Booth Smith. He, like Cathy Latham and Mr. Still, has previously been notified that he is subject of a criminal investigation related to the 2020 election. Mr. Still, along with Mr. Carver and Cathy Latham were 3 of the 16 individuals who signed the [fake elector certificates](#) that were ultimately sent to the National Archives in late 2020. Mr. Kaufmann, who along with Mr. Carver encouraged the suit, was not a partner in Hall Booth Smith at the time of the suit but became a partner afterward. Information I have received indicates Kaufmann and Robert Sinners (Georgia Trump campaign operations manager) came to Coffee County on December 12, 2020, to interview some witnesses and get them to sign affidavits for the lawsuit against our county board of elections members. Again, it should be noted that the lawsuit was signed by Mr. Still on December 12, 2021, two days after the letter signed by Mr. Chaney and a copy of Mr. Chaney's letter is attached as Exhibit "A". It may be that none of the Election Board members are aware of this lawsuit as service was made on their attorney and the suit was dismissed on January 7, the day of the initial breach. But, looking at the suit, you have a situation where members of the law firm that represents our Board of Elections and who represents our County Commissioners and who represented Mr. Chaney reportedly encouraged a lawsuit against their own client, Coffee County, and then were to get paid to "defend" the lawsuit against the county officials, all in furtherance of partisan efforts to overturn the election of 2020.

The questions I have presented here are far from comprehensive, as there are many more unanswered questions about the breaches, the responsibility for the security failures, the post-incident handling, and the responses to subpoenas and inquiries of the Court. Our county officials must address these questions, preferably through independent counsel, and hold responsible individuals accountable, and most importantly, right the ship and secure the elections, well in advance of the fall municipal elections and the 2024 presidential cycle elections.

Some will want to await investigations by the GBI or Fulton D.A. Willis before looking hard internally here in Coffee. That is the wrong approach, and merely kicking the can down the road while letting the situation deteriorate. Neither organization (GBI, Fulton DA) has the scope of mission to evaluate the governance practices or election security needs in our county. We must urgently take responsibility ourselves to act on behalf of Coffee citizens.

I urge you to seek assistance of outside independent counsel to consider a course of action to evaluate what types of investigations are needed locally, as well as how to determine what remedial actions are required for good public policy. Public faith in the purity of elections is essential in our nation to make our unique system of self-governance effective. County officials must act to regain the confidence of Coffee voters. The time to start is now.

Respectfully submitted,

A handwritten signature in black ink that reads "Jim Hudson". The signature is written in a cursive style and is placed on a light gray rectangular background.

Jim Hudson

From: James Barnes
Sent: Tuesday, August 24, 2021 10:17 AM
To: jblanchard@sos.ga.gov
Subject: Statement
Attachments: barnes.pdf

Good morning,

I have attached a detailed statement on the state in which I found the Coffee elections office in April.

James A. Barnes, Jr.
Supervisor of Elections
Coffee County
(912)-384-7018

COFFEE CO BOARD OF ELECTIONS & REGISTRATION

224 W Ashley St

DOUGLAS, GA 31533

Ernestine Thomas-Clark, Chairman

(912) 384-7018

James Barnes, Election Supervisor

Andy Thomas, Board

FAX (912) 384-1343

Wendell Stone, Board

Eric Chaney, Board

Matthew McCullough, Board

To whom it may concern,

I took over operations at the Coffee County Board of Elections & Registration on April 1st 2021. The office had been closed, and locked, since February 2021. Election materials that should have been turned over to the Clerk of Court dating from 2019 were scattered throughout the office. Documents dating as far back as 2010 were stored in a room with a leaking roof, walls and no environmental controls. Confirmation cards, precinct cards, and a large number of drivers licenses were found that had not been mailed to voters.

Coffee ICPs were stored in a room with an unlocked door to the outside of the building, a leaking roof, and walls with sunlight streaming through crevices. Pollen and dust coated the equipment and there was evidence of water accumulation. Back-up battery UPSs were stacked two, three, and four high. The faces of units were detached, and all units were tied to carts using their power cord. Memory cards from the previous voting equipment had not been turned over to CES.

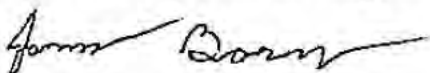
Cast ballots from multiple elections were mixed together in stacks and piles throughout the office. Absentee by mail envelopes from multiple elections were similarly strewn about the office in scattered piles. Most of the BMDs, printers, and UPSs had never been unboxed or inventoried. The routine maintenance, and charging, of equipment had not been performed and documented. There was also no color printer, camera, blue back drop, or TVIC sheets for the Voter ID system.

Regards

James A Barnes, Jr.

Coffee County

Board of Elections & Registration



From: Eric Chaney <ericchaney80@gmail.com>
Sent: Tuesday, April 12, 2022 2:29 PM
To: Jennifer Dorminey Herzog <jdherzog@hallboothsmith.com>
Subject:

Tony and Jennifer,

I do not know Scott Hall and, to my knowledge, I am not aware of nor was I present at the Coffee County Board of Elections and Registration's office when anyone illegally accessed the server or the room in which it is contained. Misty told me that she had contacted someone from the Secretary of State's office who was going to come down and investigate the November 2020 election. I do recall going by the office sometime after the recount in November 2020 and there were people present unknown to me. I believed those people to be associated with the Secretary of State's office. I have no knowledge whether or not Misty allowed anyone without authorization to access the server room (which remains locked and because of the layout of the Elections' office which is very small, you have to walk through Misty's office to access that room. Therefore, it is highly unlikely if not impossible for her not to know who did or did not enter the server room). I have no personal knowledge that anyone without authorization accessed the server room nor knowledge of any other statements or allegations in Ms. Brown's email.

Eric Chaney

I am laying this out for you because I would really appreciate the chance to include the county's perspective in the story, particularly a response to our conclusion that Hall and his team could have had access to the EMS because they were in the election office area, behind a locked door meant to keep out the general public, and in the vicinity of a usually unlocked EMS room with no one keeping a close eye on them.

If there is something we should be aware of that makes this conclusion unfair or inaccurate, I would really appreciate you letting me know. I'm not just asking as an exercise, but because we are preparing a story and I'm trying to present a clear and accurate picture.

My deadline is this afternoon and I would very much appreciate the chance to hear back from you at your earliest convenience today. Feel free to call or email and please let me know if anything I've written here needs clarification.

Thank you for your consideration.

Sincerely,
Emma Brown
202-674-5934

Sent from my iPhone

12/9/20



Tony Car

ED Car

Cathy Car



ExH. "C"

**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 McCullough, Member
Misty Martin, Election Supervisor
Jill 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.

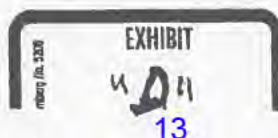
This fact (inherent inconsistency) alone was grounds not to certify the election based on the Dominion data set and report. However, the reluctance to certify the electronic recount was compounded where those results were considered in context with the two prior vote count results.

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,


Eric Chaney
Coffee County Board Member

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

2020CV343711

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*,

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.

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

**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 McCullough, Member
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December 10, 2020

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

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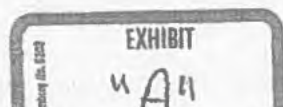
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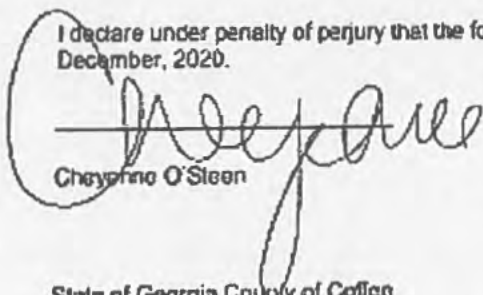


STATE OF GEORGIA
COUNTY OF COFFEE

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.

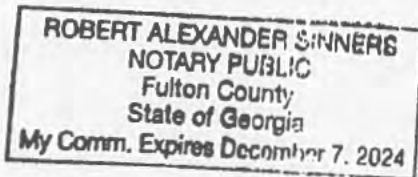

Cheyenne O'Steen

State of Georgia County of Coffee

Appeared before me ^{RAS} ~~Robert Alexander Sinners~~ 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

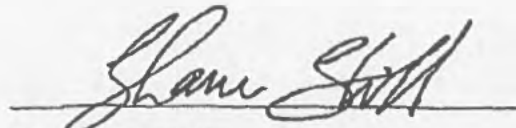




VERIFICATION

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.

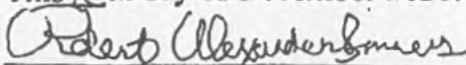
This 12th day of December 2020.



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

ADDITIONAL EXHIBITS 1-4
NOT REFERRED TO
IN LETTER



DEC 9, 2020





DEC. 10, 2020

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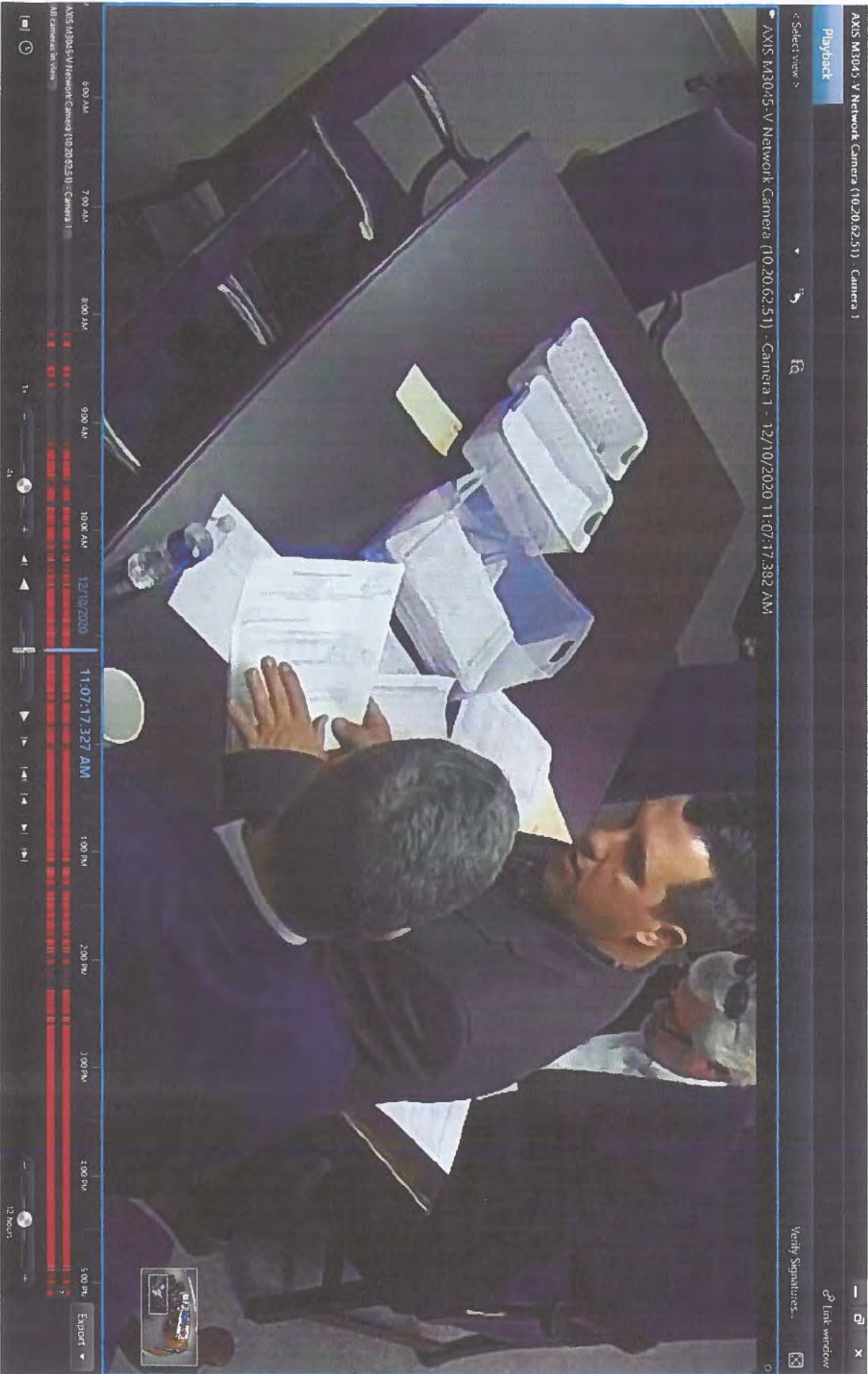
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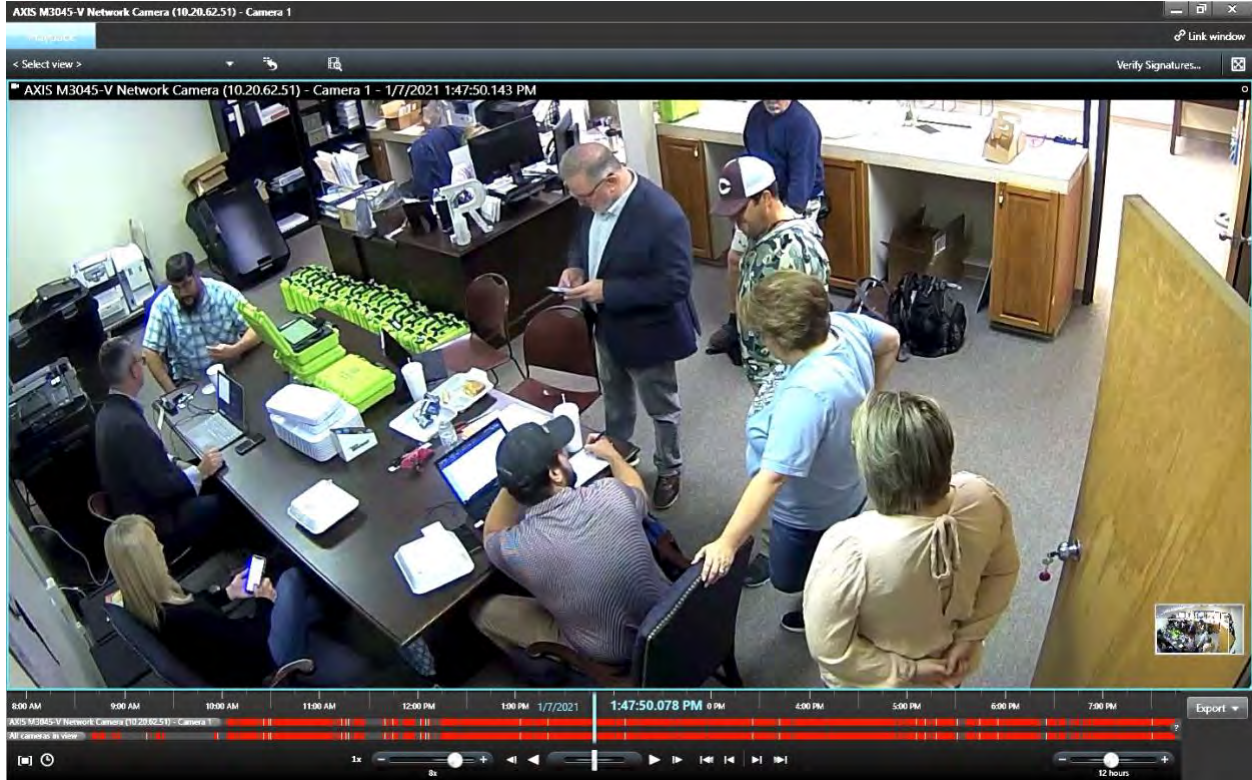
DEC. 10, 2020



DEC
10,
2020

4

January 7, 2021 Coffee Election Office
pictured Eric Chaney (camo shirt), Misty Hampton (blue tee shirt), Scott Hall (blue jacket),
SullivanStrickler staff and Alex Cruce (analyst) at table.



<https://www.heraldtribune.com/story/news/local/2023/05/21/investigators-target-cyber-ninjas-ceo-doug-logan-of-sarasota-for-possible-criminal-charges/70235749007/>

Cyber Ninjas CEO's voting machine activities in Georgia draw investigation and scrutiny



<https://www.heraldtribune.com/staff/3320763001/chris-anderson/>

At 4:20 p.m. on Jan. 18, 2021, [Doug Logan was allowed inside an elections office in rural Georgia](#) to examine voting machines. He admittedly did not have authorization from any government agency.

As Logan walked down a sidewalk and approached the brick building in Coffee County, about 200 miles southeast of Atlanta, he could not conceal his smile.

Already inside was an all-too-willing elections supervisor who had unlocked the door for Logan's coordinated visit, which was confirmed by a security camera.

Logan, along with a colleague named Jeffrey Lenberg, left nearly four hours later, only to return the next morning. Logan stayed much longer this time, altering dates on computers, reconfiguring settings, and scanning over 6,400 ballots, according to a lawsuit document that also alleged: "one precinct scanner was physically opened to inspect the internal parts."

Logan's visit is part of a broader investigation that could lead to the first criminal charges for those involved in the push to overturn President Joe Biden's victory over Donald Trump in 2020.



Logan – a Sarasota County resident who doubted the veracity of the presidential election – spent nearly 13 hours inside the elections office with Lenberg and a county elections official named Misty Hampton who no longer works in that job.

Hampton granted the pair unfettered access to voting machines, admittedly without the authorization or knowledge of the Georgia Secretary of State, which is a potential violation of state law, according to attorneys.

Logan, however, said in a deposition he assumed that proper channels were adhered to and that someone in his working group had received the proper assurance their activities were lawful.

"If there were any indication that it wasn't authorized, I would not have done it," Logan said in a deposition.

A mortgage, a PPP loan and an office sale

On Jan. 25, 2021, a week after the visit, records show Logan – father of 12 children – paid off a \$422,750 mortgage on his Sarasota County home. It took him less than four years.

On the same date, government records show, a Payment Protection Loan of \$99,081 granted to his business called Cyber Ninjas Inc. for payroll during the pandemic was forgiven.

Cyber Ninjas Inc. also sold an office on Fruitville Road on Dec. 10, 2020, for \$153,000, property records show.

"The last bit of money to finally pay off my house came from the sale of the Cyber Ninjas condo," Logan said in an email to the Herald-Tribune. "I've had a 25-year goal of owning my home debt free, and I busted my butt to make it happen.

"I'm so sick of these arguments trying to imply it's because I broke the law and it was from PPP loans, or Patrick Byrne paid it off. I had a successful business. It's not news that I own my home."



'The bigger movement later'

After Logan's two visits to the Coffee County elections office, he wrote a "Special Report" based on his observations.

The possibility of using the information in Logan's report to decertify a crucial runoff vote for a United States Senate seat was discussed, according to an email revealed in a Georgia civil lawsuit that involves voting machines.

The email, at the time, referenced the upcoming certification of Georgia Democrat Jon Ossoff's crucial win over Republican David Perdue for a Senate seat that would decide the majority.

The email to Logan was written by a colleague named Jim Penrose, and it read:

"Here's the plan. Let's keep this close hold. We only have until Saturday to decide if we're going to use this report to try to decertify the senate runoff election or if we hold it for a bigger movement later."

It is unclear "what the bigger movement later" was.

Defending the Republic

According to CNN, the potential breach in Coffee County involving Logan is part of a larger criminal investigation into 2020 election interference by Fulton County district attorney Fani Willis, who is expected to announce this summer the results of an investigation that could bring racketeering charges against multiple individuals who bought and peddled Trump's election fraud falsehoods.

The Georgia Bureau of Investigation has also said it is looking at the Coffee County activities involving Logan.

Logan's involvement in obtaining information about the inner workings of Dominion voting machines was more far-reaching.

Logan was active in several counties in Michigan, along with Georgia, Nevada, New Hampshire, Arizona, and Pennsylvania, records show and was copied on numerous emails of importance to a group mission.

Activities in at least two of those states were funded by a nonprofit called Defending the Republic, which was run by Sidney Powell, a former attorney for Trump and Ret. Gen. Michael Flynn, who lives in Englewood.

Powell's nonprofit was under federal investigation. It is unclear if it remains so.

The nonprofit, which received contributions of \$16,390,340 between Dec. 1, 2020, and Nov. 30, 2021, according to its 990 tax filing, has used several Sarasota addresses in recent years for business filings, including a downtown office space and a small home near Siesta Key.

The home belongs to a woman named Mary Pat Coughlin, who has been listed as the chief financial officer of Defending the Republic for the last several years. She signed the non-profit's most recent 990 tax form on Aug. 14, 2022, a form that listed her as working 40 hours per week for Powell.

The same form also said the non-profit gave Cyber Ninjas, Logan's former company, a cash grant of \$700,128 for "equipment." Cyber Ninjas conducted the Maricopa audit in Arizona in 2021. Logan said the company lost over \$2 million and is now out of business.

How Coughlin became involved with Powell is unclear. Little is known about Coughlin, though records show she is a long-time Sarasota accountant who has been involved in a company that has produced movies about the Florida Skunk Ape.

Coughlin did not come to the door of her house when told by a man living there that a reporter was asking about Powell.

Logan's loan:[OPINION: This loan from CEO of Cyber Ninjas comes off as curious](#)

The Big Lie:[OPINION: Cyber Ninjas' connection to Big Lie runs far, deep and dangerous](#)

No More Ninjas: [Sarasota's Cyber Ninjas is out of business after losses from Arizona vote audit, founder says](#)

Criminal investigation in Michigan over voting machine tampering

Logan, who said in a deposition he likely signed a confidentiality agreement with Defending the Republic at one point, remains part of a criminal investigation in Michigan centered on voting machine tampering, and according to the Detroit News, a special grand jury was hearing testimony as recently as March.

Last August, Dana Nessel, Michigan's Attorney General, said in a petition that Logan was one of nine people involved in a "conspiracy" to gain unauthorized access to voting machines in that state, a felony that can carry up to five years in prison.

Logan, according to the Attorney General's petition, was one of four people who took five tabulators to hotel rooms or Airbnb property rentals in Oakland County and "broke into the tabulators and performed tests on the equipment."

Logan's involvement in the quest to prove voter fraud occurred in the 2020 election apparently began on a plantation in South Carolina owned by attorney Lin Wood called Tomotley.

Logan was at the property from Nov. 14, 2020, through Christmas Eve, he said in a deposition, leaving at least once to attend a strategy meeting in D.C.

Two Sarasota County residents – former CEO of Overstock.com and Flynn – were at the meeting, according to a deposition.

The plan, Logan said in a deposition, was to identify counties that displayed what the group believed to be abnormalities in voting machines, file lawsuits funded by Powell's nonprofit, Defending the Republic, and obtain forensic images from the machines to support litigation.

By Christmas 2020, Logan said he was unable to find counties that would cooperate with an examination, until, he said, someone made contact with Coffee County. That surprised him.

According to a civil lawsuit, "Georgia's voting system was breached by a team from forensics firm SullivanStricker, was orchestrated by Coffee County Republican Chair Cathy Latham, election officials Misty Hampton and Eric Chaney, and Cyber Ninjas CEO Doug Logan."

The lawsuit also said, "An organization funded and operated by Sidney Powell, an attorney for the Trump campaign, paid for the infiltration."

Logan said they reached out to the Atlanta-based SullivanStricker to help them because the forensics company was a "highly reputable firm who would do it the proper way so it would be legally admissible."

Lenberg, a colleague of Logan's, first visited the Coffee County office on Jan. 7, 2021, the day after the insurrection in Washington D.C.

Logan was not there.

An invoice shows that SullivanStricker billed Sidney Powell, and Defending the Republic, \$26,000 for work in Coffee County on that day.

Back in Coffee County

Lenberg was back in Coffee County on Jan. 17, 2021, sending an email to Logan that said, "I am in Coffee County now. It will be Monday evening. She thinks she can do it then."

Lenberg, apparently, was referring to Hampton, the elections official who would let the men into the office on Jan. 18 and 19, 2021. Security camera footage shows she did just that.

Logan said he did not touch any voting equipment during the 13 hours he spent inside the office, nor did he scan any ballots. He said he gave instructions to Hampton to perform certain tasks instead. And she would.

A court document said, "SullivanStricker uploaded the data it collected from Georgia's voting system – including protected software from nearly every component of that system – to a cloud-based ShareFile site and provided login credentials to download the data to individuals identified by Sidney Powell. Anyone with login credentials could access the data.

"Mr. Logan uploaded several files, including virtual machine copies of the voting system components and a new version of the EMS server files to the ShareFile site from a location in Florida on Jan. 16, 2021.

"SullivanStricker did not know why Mr. Logan uploaded these files, what they were, or where they came from. Others apparently downloaded data from locations as far-reaching as California, Kansas, England, and Italy."

During a deposition on Nov. 11, 2022, Hampton, the former elections official, was asked:

"Did you inform anyone at the Secretary of State's Office before Mr. Lenberg and Mr. Logan came to the Coffee County Office?"

"I did not," she said

"And why did you not let the Secretary of State's Office know?"

"I take the fifth," she said.

Hampton was also asked:

"Was the visit by Logan and Lenberg to your office on Jan. 18th and 19th related to any effort to decertify the Senate runoff election?"

"I have no idea," she said.

During Logan's deposition on Nov. 18, 2022, he was asked by an attorney the same question as Hampton.

"Do you recall how your report would have been used to decertify the Senate run-off election?"

"I don't think I ever knew that," Logan said. "So no, I have no idea."

"Was one of the purposes of your being (in Coffee County) to get evidence to decertify the Senate runoff election?"

"I don't recall that being discussed at any point in time," Logan said.

"Is it possible your work was going to be used for purposes you did not intend it to be used for?"

"I mean, that's always a possibility," Logan said.

'What they could have done'

David Cross, a D.C. attorney who deposed Logan, Lenberg, and Hampton, among others, tried to sum up the Coffee County office visit before a judge during a hearing.

"This is how I think about it," he said. "If we are going on a skydiving trip and we saw a bunch of bad actors unpack our parachutes, take them all apart and repack them, and then the pilot said, 'Don't worry, your parachute is probably fine, so go ahead and jump,' and you find out in the air, no one would jump.

"This is where we are. We have lots of people who are widely considered bad actors because of the lies they spread about the 2020 election who had unmitigated access to the election system – not pieces, not disconnected pieces, but the actual system – for the better part of two weeks.

"And we don't know what they all did.

"But we do know what they could have done."