

January 9, 2024

The Honorable Benjamin W. Cheesbro, Magistrate Judge
Frank M. Scarlett Federal Building
801 Gloucester Street
Brunswick, GA 31520

Reference: Coalition for Good Governance and Donna Curling v. Coffee County Board of Elections
& Registration. 5:23-mc-00001-LGW-BWC

Dear Judge Cheesbro,

My letter motion pertains to the case seeking enforcement of, or sanctions related to, subpoenas targeting Coffee County Board of Elections & Registration (CCBOER) records regarding the Jan. 2021 elections office intrusions.

A freelance investigative journalist for more than a decade, I've spent over eight months investigating the Coffee County elections office breach. For my latest article, published Dec. 19 by the *Daily Dot*, an Austin-based online news outlet founded in 2011, I uncovered three pieces of information that I believe are key to this case. I alerted CCBOER and their counsel, in a letter emailed on Jan. 4, to these three revelations and to my article:

<https://dailydot.com/news/missing-laptop-trump-case-georgia/>
https://douglaslucas.com/files/LetterToCoffeeOfficials_DouglasLucasLaptopArticle_4Jan2024.pdf

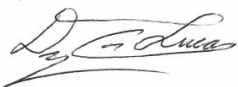
1. At the Nov. 22 hearing, CCBOER counsel Wes Rahn addressed the matter of sworn declarations that plaintiffs hoped would reveal each proposed declarant's knowledge or lack of knowledge about the missing silver laptop used for years by Misty Hampton, election supervisor during the breach. The proposed declarants: county manager Wesley Vickers; senior county lawyer Tony Rowell; and Charles Dial, head of Coffee County's longtime IT contractor. Rahn said CCBOER had requested declarations from them. Presumably relying on Rahn's assertion, Your Honor wrote in a Nov. 28 order that "Defendant has relayed the declaration requests." But that same day, I called Dial. To quote my article, Dial "told the *Daily Dot* in a Nov. 28 telephone conversation that he wasn't aware of the request for a sworn declaration. Before deferring further questions to Coffee County's open records office, he said, 'I have no recollection, I have nothing on that, I don't even know what you're talking about, honestly.'" Were the requests really relayed? Given the total surprise of proposed declarant Dial at the very idea, it seems not.

2. At the Nov. 15 hearing, CCBOER counsel Ben Perkins speculated that maybe, the silver laptop belongs to the Georgia Secretary of State, not his client. But as my article explains: "if the laptop were Georgia's property, the county could obtain it or documentation confirming its ownership, such as an inventory form or purchase receipt. The Secretary of State's Office told the *Daily Dot* on Nov. 28 that they do 'not have records responsive to this request' for inventory or purchase documents concerning the silver laptop." That ORR correspondence:

https://douglaslucas.com/files/SOSLucasEmails_LateNovember2023.pdf

3. Based on my interviews with longtime elections board member Ernestine Thomas-Clark and James Barnes, the election supervisor who replaced Hampton in April 2021, my article finds, contrary to a chief theory of the respondent's, that Hampton did *not* leave with the laptop when ousted in February 2021, nor was it her personal property. Instead, it disappeared in December 2021 after Barnes resigned early that month. With the Secretary and Hampton eliminated as possibilities, no viable candidate for the silver laptop's owner exists except Coffee County.

Sincerely,



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cc: DOJ Special Counsel Jack Smith; CISA Director Jen Easterly