



*Voters Organized for Trusted  
Election Results in Georgia*

***Refutation of Georgia  
Secretary of State  
Brad Raffensperger's  
False Election Claims***

Produced for Georgia County Election Officials and  
the Georgia General Assembly

**ABSTRACT**

*Based on claims made in a January 6,  
2021 letter to Vice President Michael  
Pence, Georgia Members of Congress  
and the Georgia General Assembly*

**GARLAND FAVORITO / BOB COOVERT**

February 8, 2022 - Edited February 10, 2022



February 8, 2022

## **I. BACKGROUND**

On January 6, 2021, Georgia Secretary of State (SOS) Brad Raffensperger wrote to Georgia Congressional members, Vice President Pence and leaders in U. S. Senate and House claiming that false allegations about the November 3, 2020 General Election in Georgia were being made by “*the President and his allies*”. The contents of his [letter](#) dramatically contradicted findings by the Georgia General Assembly based on extensive first-hand testimony from three hearings:

- [December 3 – Senate Judiciary Sub-Committee](#)
- [December 10 – House Government Affair Committee](#)
- [December 30 - Senate Judiciary Sub Committee](#)

On December 17, 2020 the Georgia Senate Judiciary Election Law sub-committee provided their election integrity findings to Secretary Raffensperger and the executive branch. The sub-committee chair was former Judge William Ligon with 16 years' experience dealing with evidence. Finding number 9 of his [report](#) states, “*The oral testimonies of witnesses on December 3, 2020, and subsequently, the written testimonies submitted by many others, provide ample evidence that the 2020 Georgia General Election was so compromised by systemic irregularities and voter fraud that it should not be certified*”. When Senator Ligon was asked what did Secretary Raffensperger do with the evidence in your report, he stated, “*the Secretary did nothing*”. The Secretary did not even reference any of the General Assembly's evidence in his letter to Congress.

During the past year, more extensive evidence about 2020 election fraud, errors and irregularities have become readily available. The availability of this new information is attributable, in part, to:

- Additional legal evidence that has been made available through court cases;
- The General Assembly's passage of a new law to make ballot images public;
- Georgia Open Records Requests that have either been fulfilled or denied;
- Extensive independent research that has been conducted into the election;

Much of the newer information could have only been known by the SOS office and certain election officials at the time leading up to the December certification of the election and the aforementioned letter to Congress. As a result, it has now become obvious that Secretary Raffensperger's letter withheld facts about the election that the U.S. Congress and the general public needed to know. It is also obvious that the letter contained many false statements and deceptively misleading claims.

This document offers a point-by-point refutation of those false and misleading statements in the letter. These false or misleading statements from SOS Raffensperger's office will come as no surprise to many Georgians who are aware that **the August, 2019 U.S. District Court order in the *Curling v. Raffensperger* case found the SOS office to be “not credible”**. In referring to (*BRAD RAFFENSPERGER, et al.*) Judge Totenberg stated, “*The Defendants have previously minimized, erased, or dodged the issues underlying this case. Thus, the Court has made sure that the past is recounted frankly in this Order, to ensure transparency for the future.*” [pg152]. Transparency is paramount in any election in our Republic as Judge Totenberg provides insight to the character of Secretary Raffensperger and his office.



## **II. POINT BY POINT REFUTATION OF FALSE CLAIMS TO CONGRESS**

The individual refutations in this document are organized in sections that correspond to the introduction and sections of Secretary Raffensperger's original letter. Each refutation contains an original quote of the false or deceptive statement and one or more paragraphs of refuting facts. In many cases, electronically linked source references that are underlined have been included so the reader can have the assurance that the facts presented in this document are the true and correct ones.

### **A. INTRODUCTORY CLAIMS**

1. *"However, my office has taken multiple steps to confirm that the result is accurate, including conducting a hand audit that confirmed the results of the Presidential contest,"*  
**Governor Brian Kemp's [36-point report](#) and [letter](#) for the State Election Board confirmed that the hand count audit conducted for Fulton County Presidential race on November 14-15, 2020 was fatally flawed. His report is based on an [independent VoterGA analysis](#) of the hand count audit results that found the audit contained:**

- A 60% batch error rate;
- 7 falsified tally sheets with 850 Biden votes to 0 Trump votes;
- Over 200 duplicate scanned ballots;
- Over 4,000 duplicate reported ballots.

**It is simply not possible that an audit with a 60% error rate, falsified tally sheets and thousands of duplicate votes in the audit results could confirm original election results.**

2. *"...a recount requested by President Trump that also confirmed the result..."*  
**The recount requested by President Trump as well as the original election were both conducted on a voting system that the U.S. District Court found to be unverifiable to the voter and in violation of Georgia laws. An October, 2020 [U.S. District Court order](#) explained this in great depth. It is not feasible for a system that is illegal and unverifiable to the voter to have confirmed election results and it is equally as unfeasible that the original results produced under the same conditions could be deemed credible. [pg. 81-82]**

3. *"...an audit of voting machines that confirmed the software on the machine was accurate and not tampered with..."*  
**The "audit" referenced did not confirm the software was accurate, nor was it intended to do so. It only confirmed the software versions were as expected. The difference between the Georgia "audit" and the Maricopa County audit performed by Pro-V&V are described in the Addendum.**

**Furthermore, the [Field Audit Report](#) confirms the "audit of the voting machines" did not evaluate any Election Management Server (EMS) that runs in each of the 159 Georgia counties. The evaluation was limited to Ballot Marking Devices and scanners that are either Image Cast Precinct or Image Cast Central models. Testing of the EMS is mandatory to determine if software is accurate because the server is integral to a final tabulation and**



**publishing of results. Thus, the overall system was neither confirmed as accurate or checked for tampering.**

4. *"... an audit of absentee ballot signatures in Cobb County that confirmed that process was done correctly."*

**The audit of absentee ballot signatures in Cobb County did not confirm that the process was done correctly in all other counties, especially given that some other counties had many more instances of questionable ballots. The dramatic, inappropriate, statewide reduction in signature rejection rates from 3.47% in 2018 to .34 % in 2020 is evidence that the signature verification process was not properly done in many counties.**

5. *"Law enforcement officers with my office and the Georgia Bureau of Investigation have been diligently investigating all claims of fraud or irregularities and continue to investigate."*

**The Georgia Bureau of Investigation (GBI) declined to investigate ballot harvesting claims made by True the Vote. True the Vote provided the GBI office with Geo tracking data, surveillance video and allegations from a whistle blower indicating that teams of 242 ballot harvesters may have stuffed thousands of ballots into drop boxes. Many of these drops were allegedly between midnight and 5am by harvesters who were paid \$10 per ballot according to a whistle blower in what seems to be a multi-million-dollar operation.**

**The SOS Inspector General's (IG) office now states they are investigating these claims 14 months after the election was conducted. When faced with similar claims, the IG office did not diligently investigate them. They did not attempt to have election records unsealed so they could investigate claims of counterfeit ballots, unsecured test ballots and unusual, unexplained vote count spikes. Instead, whistleblowers Suzi Voyles, Bridget Thorne and Garland Favorito, who respectively voiced these concerns, contend that the IG office attempted to investigate them when an investigator contacted them.**

6. *"Their work has shown me that there is nowhere close to sufficient evidence to put in doubt the result of the presidential contest in Georgia."*

**The margin of victory in the Georgia 2020 Presidential race is 11,779 votes. The number of uninvestigated, potential counterfeit ballots previously mentioned could be in the tens of thousands according to at least one affidavit. The uninvestigated ballot harvesting previously mentioned could even involve hundreds of thousands of ballots according to the evidence presented. Each of these uninvestigated claims involves a number of potential ballots that could put the presidential contest in doubt.**

7. *"While there is no such thing as a perfect election, our law enforcement officers are not seeing anything out of the ordinary scope of regular post-election issues that will be addressed by the State Election Board after the investigations are complete."*

**Many examples of conditions that are outside the ordinary scope of regular post-election issues have been identified for Georgia's November 2020 election in this document. Examples that have been ignored or not meaningfully investigated by SOS law enforcement officers are:**



## ***Refutation of Georgia Secretary Brad Raffensperger's False Election Claims***

- Counterfeit ballots in Fulton County audit results;
- Ballot harvesting teams operating in several counties;
- Inexplicable voting system malfunctions in multiple counties;
- Improper chain of custody forms for over 100,00 drop box ballots statewide;
- Destroyed or lost original ballot images totaling over 1.7 million statewide;

The State Election Board has never been equipped to investigate these types of irregularities and would not be impartial since their investigators actually work for the IG who reports to the SOS.

8. *"There will end up being a small number of illegal votes (there always is in any election because federal and state law err on the side of letting people vote and punishing them after the fact), but nowhere near the amount that would put the result of the presidential election in question."*

**Examples of existing apparent conditions that put the 11,779-vote margin of victory for the presidential election into serious question include:**

- [Sworn affidavits](#) indicating there may be tens of thousands of counterfeit ballots;
- 17,724 certified votes in Fulton County that have no ballot images at all;
- 18,325 voters who voted from a vacant address based on U.S. Postal Service records;
- [Improper chain of custody forms](#) for over 100,000 drop box ballots statewide;
- Destroyed or lost original ballot images totaling over 1.7 million statewide

9. *"The result of the presidential election is not what I preferred, but the result from Georgia is accurate."*

**Given facts cited above and elsewhere in this document it is simply impossible to definitively state that results of the Presidential race or other Georgia races are accurate.**

10. *"Just as the result of your own election was valid and accurate, the certified result in the presidential contest is valid and accurate as well."*

**There is no evidence that the result of the elections for members of the U.S. Congress who received Secretary Raffensperger's letter are accurate because U.S. Congressional races, as well as those races for members of the Georgia General Assembly, are never audited. Thus, Georgia has no mechanism to ensure these specific elections are valid and accurate.**

### **B. ALLEGATIONS INVOLVING DOMINION VOTING SYSTEMS**

11. *"There was even a social media rumor that a third-party had conducted an audit of voting machines in Ware County, Georgia and had found that the machines "flipped" votes from Trump to Biden at a rate of 28%. Not a single part of that rumor was true."*

**Several parts of this mis-reported social media "rumor" are true. [Certified Ware County election results](#) from the SOS office reported that Donald Trump received 9865 votes, Joe Biden received 4211 votes and Jo Jorgenson received 136 votes in the 2020 General election. [Published audit results](#) for Ware County confirmed that Donald Trump actually received 9902 votes, Joe Biden received 4174 votes and Jo Jorgenson received 117 votes.**

Thus, the hand count audit revealed the Dominion voting system recorded 37 more votes for Joe Biden and 37 less votes for Donald Trump than the actual, verifiable audit totals. The rate is about .25% or almost exactly the victory margin rate that Joe Biden received over Donald Trump. The SOS office admitted in a press release that the audit found 37 more votes for Donald Trump than the voting system originally reported but did not acknowledge that the audit found that the system originally attributed those 37 extra votes to Joe Biden.

12. *"It was quickly debunked by the Ware County Elections Director and by fact checkers."*  
The Ware County Elections Director affirmed in his [written confirmation](#) that the above audit totals and the 37-vote differentials between the audit and the certified election results for the candidates are correct as stated above. The "fake" fact checker referenced never contacted VoterGA to confirm the details of the allegations.
  
13. *"The allegations about Dominion most relevant to the election outcome in Georgia are that votes tallied on a Dominion vote tabulator were somehow manipulated on a statewide basis to elevate the count in favor of the Democratic presidential candidate. It is important to understand that this is not possible—not on a machine-by-machine basis, not by alleged hacking, not by manipulating software, and not by imagined ways of "sending" votes to overseas locations—"*  
Expert witness [testimony](#) in the *Curling v. Raffensperger* case from Professor [Alex Halderman](#) and cybersecurity expert [Harry Hursti](#) did show that it is possible to manipulate the vote via various types of hacking. In fact, Georgia's Dominion voting system is so vulnerable that a comprehensive [hacking study](#) produced by Prof. Alex Halderman is still under seal by the U.S. District court.
  
14. *"In Georgia, we were able to show that none of these allegations are true because we completed a 100% hand audit of all ballots cast in the presidential contest."*  
The [published hand count audit results](#) of the presidential contest demonstrated that the certified election results were inexplicably inaccurate in many counties. The audit was limited to only the Presidential race and certainly did not prove whether or not voting system election results in all races can be, or were, manipulated.

As previously explained, [an independent VoterGA analysis](#) of the hand count audit results conducted for the Fulton County Presidential race on November 14-15, 2020 found that it was fatally flawed. Specifically, the audit results contained:

- A 60% batch error rate;
- 7 falsified tally sheets with 850 to 0 Biden votes;
- Over 200 duplicate scanned ballots;
- Over 4,000 duplicate reported ballots among other problems.

Furthermore, tally sheets for over 50,000 Fulton and Cobb. Co. ballots were added to the audit roughly two months after it was conducted. It is simply not possible that an audit with a 60% error rate, falsified tally sheets and thousands of reported duplicate ballots could confirm the original reported election results, especially with a 0% risk limit.

15. *"This hand audit, which relied exclusively on the printed text on the ballot-marking device ballot or the bubbled in choice of the absentee ballot confirmed the result of the election with a 0% risk limit."*  
As previously explained, [an independent VoterGA analysis](#) of the hand count audit results conducted for the Fulton County Presidential race on November 14-15, 2020 found that it was fatally flawed. Specifically, the audit results contained:

- A 60% batch error rate;
- 7 falsified tally sheets with 850 to 0 Biden votes;
- Over 200 duplicate scanned ballots;
- Over 4,000 duplicate reported ballots among other problems.

Furthermore, tally sheets for over 50,000 Fulton and Cobb. Co. ballots were added to the audit roughly two months after it was conducted. It is simply not possible that an audit with a 60% error rate, falsified tally sheets and thousands of reported duplicate ballots could confirm the original reported election results, especially with a 0% risk limit.

The audit was fatally flawed for the following reasons:

- There was a 6' monitoring restriction that prevented monitors from meaningful audit of the elections;
- There was no provision to deal with counterfeit ballots when they were identified;
- The two person tables did not have a member of opposing parties or campaigns present and this facilitated collusion which led to falsified tally sheets;
- Monitors were often prohibited from monitoring the data upload point so there was no way to verify the tally sheets totals were entered correctly;
- The counties were forced to enter data into a remote SOS system thus breaking the chain of custody for the entire statewide audit;
- The counties failed to maintain their own original data entry result totals and had no means to confirm whether or not the SOS reported audit results were accurate.

16. *"We further know these allegations are false because our office engaged a federally certified voting systems test lab to perform an audit of the voting machines following the November election."*  
The federally certified systems test lab, ProV&V, was not accredited to perform any audits. The lab is only certified to determine if the voting machines conform to the Election Assistance Commission's (EAC) Voluntary Voting System guidelines from 2005.

Furthermore, the SOS and his office knew of the security weaknesses in advance of the 2020 General election based on expert witness testimony in the *Curling v. Raffensperger* case from Mr. Vincent Liu, a leading international cybersecurity analyst and consultant. Mr. Liu dismisses Pro V&V's and Dominion's reliance on hash values as a central software security protective device. "[I]f you have an infected BMD that has been compromised [by malware], it can just tell you whatever value that it wants." (Id. at 59.) "[A]s it is deployed within the Dominion devices, it does not appear to be used in a fashion that could be considered secure. It can easily be circumvented." (Id. at 64.) Liu similarly addresses the insecurity of the encryption key and other gateways to the system that he states can be





bypassed by malware to allow access to QR codes (and faking of such). (Id. at 60-61, 63; Liu Decl., Doc. 855-2 at 5-8.)

17. *“Pro V&V conducted an audit of a random sample of Dominion Voting Systems voting machines throughout the state using forensic techniques, including equipment from Cobb, Douglas, Floyd, Morgan, Paulding, and Spalding Counties. ICP (precinct ballot scanners), ICX (ballot marking devices), and ICC (central absentee ballot scanners) components were all subject to the audit.”*

**It is disingenuous to claim that Pro V&V used forensic techniques. The activity they performed simply confirmed the software and firmware versions running on each device. The Summary Findings of their report clearly state: *“During the Field Audit, a total of eighteen (18) components located among six (6) counties were evaluated to verify the version of software/firmware running on each device”***

**The EAC's best practices manual explains: *“Digital forensics require specialized skillsets, and the audit team should possess certifications or applicable work experience in this specialty. Industry standard certifications are offered by organizations such as the International Association of Computer Investigative Specialists (IACIS) or the Sans Institute.”*** [Pg 15]

**A U.S. District Court order found ProV&V's Jack Cobb, who approved the Field Audit Report, was not qualified to do so. The court found: *“Mr. Cobb testified at the injunction hearing that he had fourteen years of experience in testing voting machines, but as became apparent in the course of these proceedings, he does not have any specialized expertise in cybersecurity testing or analysis or cybersecurity risk analysis.”*** [Pg 21]

**For these reasons, no legitimate “audit of the voting machines” has ever been conducted. In fact, Cobb and Paulding counties indicated that no such audit was ever done in their counties.**

18. *“Through each of these actions, I can definitively say that the results reported by the Dominion Voting System used in Georgia were accurate.”*

**In addition to all the problems cited above that show Georgia's voting system cannot be proven to be accurate, the Coffee County voting system [failed to recount](#) the Presidential race correctly. County election officials refused to certify the electronic recount results and provided extensive documentation to the SOS office and the General Assembly. Several Coffee County election officials testified about the problems in Georgia [House](#) and [Senate hearings](#) held during December 2020. The Secretary of State withheld this critical information in his letter. Given all of these conditions stated, and the references included in this document, it is impossible to definitively say that the Dominion voting system results reported in Georgia are accurate.**

### **C. ALLEGATIONS REGARDING ABSENTEE BALLOTS**





## **Refutation of Georgia Secretary Brad Raffensperger's False Election Claims**

19. *"The truth is that my office protected and strengthened Georgia's signature verification system."*

**The truth is that Secretary Raffensperger, with assistance from the office Attorney General Chris Carr, entered into a "settlement agreement" that allowed ballot signatures to be verified against the corresponding ballot application signature rather than the actual voter signature on file. This resulted in a statewide decrease in the signature rejection rate from 3.47% in 2018 to .34% in 2020. That reduction allowed roughly 45,000 questionable ballots to be accepted into the 2020 General Election results. The Secretary has attempted to block inspection of those ballots and envelopes in Fulton County.**

**In addition, it appears many of these questionable signatures were updated into the voter registration database replacing valid signatures on file. The legislature was so concerned about this vulnerability that they eliminated election signature matching altogether when passing [SB202](#) in 2021. They chose to replace it with Driver's License and Alternate ID number matching instead. Thus, SOS Raffensperger's office actually weakened the signature verification process so much that it became untenable and had to be replaced.**

20. *"We chose to start with Cobb County because it was the only county where the President and his allies had submitted any credible evidence that the signature verification process was not properly done."*

**The dramatic statewide 90% reduction in signature rejection rates is credible evidence the signature verification process was not properly done in many counties, not just Cobb. The evidence justified signature audits on the envelopes in most, if not all, counties.**

**It is diversionary to perform a signature audit in Cobb County when the election issues continued in Fulton County as per Secretary Raffensperger's own [statement](#): "After 20 years of documented failure in Fulton County elections, Georgians are tired of waiting to see what the next embarrassing revelation will be."**

21. *"There have also been allegations of so-called "pristine ballots" in Fulton County. These are ballots that partisan poll watchers thought looked suspicious during the hand audit because they were not folded (as ballots that had been put in an envelope would be). First, there are numerous reasons why a hand-marked ballot may be not folded. Emergency ballots, which are ballots cast by eligible voters at polling places if there is an issue with a ballot marking device, are scanned straight into the scanner. Certain military/overseas ballots or ballots that are damaged and cannot be scanned are duplicated and would also not be folded prior to scanning. The unstated implication of this allegation is that county elections officials are creating fake or invalid ballots and running them through scanners. There is absolutely no evidence that this happened a single time in Georgia."*

**Six affidavits from four senior poll managers and two audit monitors provide prima facie, probable cause evidence of counterfeit ballots in the Fulton County 2020 General Election results. The monitors found "mail-in" ballots there were not creased from being mailed, not marked with a writing instrument, not on the correct paper stock and marked the same way in all down ballot races. At least one affidavit indicated that the number of counterfeit ballots could be as high as tens of thousands. These ballots were not from military/overseas batches and were not part of the 100 or so emergency ballots that were used in two precincts that had emergencies during the election.**

There is no evidence as to how the counterfeit ballots got there because SOS Raffensperger opposed a public ballot inspection. SOS Raffensperger made no substantive attempt to determine who created and injected fake ballots into the system and even filed an [amicus brief](#) against petitioners attempting to obtain a court order for a public inspection of the ballots. The petitioners' [reply brief](#) identified substantial false claims in the content of the Raffensperger's amicus brief.

22. *"One of the first things I did as Secretary of State was to ensure that ballot harvesting was illegal in Georgia."*

In addition to the subversion of signature verification matching as previously cited, Secretary Raffensperger implemented outdoor drop boxes for the 2020 General Election, which facilitated ballot harvesting. Voters were previously required to either mail in their ballot or return it in person to their election's office. Outdoor drop boxes gave ballot harvesters the opportunity to drop any number of ballots into the election system in the wee hours of the morning for days on end during early voting.

SOS Raffensperger also failed to ensure that video surveillance was readily available to review prior to election certification. A VoterGA volunteer was told by one county that it would cost \$15,000 to get the videos. Other counties refused to provide any videos until months after the election was certified. Open Records Requests show that many counties destroyed their videos within weeks after the election despite federal and state retention laws requiring election records to be held for approximately two years.

Furthermore, SOS Raffensperger failed to ensure that all chain of custody forms were completed correctly for ballots picked up from drop boxes. Reports have shown that 43,000 ballots picked up in Dekalb County have improper chain of custody forms and forms for an estimated 355,000 ballots are missing. Another analysis found that forms representing over 100,000 ballots were improperly completed in violation of various State Election Board rules. There was no requirement for counties to record the number of ballots received from drop boxes.

The SOS office is now investigating True the Vote's [complaint](#) of a massive ballot harvesting effort in the 2020 election. True the Vote provided the SOS office with Geo tracking data, surveillance video and allegations from a whistle blower indicating that 242 ballot harvesters stuffed thousands of ballots into drop boxes. They were allegedly paid \$10 per ballot in what is apparently a multi-million-dollar operation.

SOS Raffensperger did not ensure that ballot harvesting was illegal but instead implemented an environment that allowed ballot harvesting to flourish in a manner that devastated the legitimacy of the certified 2020 General Election results.

23. *"No specific allegations of ballot harvesting have been brought forward."*

True the Vote has filed a specific [complaint](#) with the office of the Secretary of State including details of the ballot harvesting allegations cited above. They also filed two other complaints involving the destruction of video surveillance footage in violation of federal and state election retention laws that require two-year preservation.

In addition, VoterGA released actual [video footage](#) of a ballot harvester fanning an array of ballots, taking a picture of them (for payment) and then stuffing them into a drop box in Gwinnett County. The Secretary of State's office had access to all of the described ballot harvesting videos since the election was conducted in November, 2020.

24. *"Nevertheless, the MITRE Corporation's National Election Security Lab conducted a statewide Ballot Harvesting Analysis of the November elections across Georgia's 159 counties."*

The MITRE [report](#) entitled *"Data Analytics to Enhance Election Transparency"* could hardly be considered a *"ballot harvesting analysis"*. Its contents are limited to statistical academic theory, not actual evidence. The report does not mention specific facts discovered about Georgia ballot harvesting operations that contradict its theories.

The report compares the number of ballots requested to the number of ballots returned. This methodology fails to consider that harvesters may have made ballot requests that were approved. The report further compares the percentage of vote for the winner with the percentage of voter turnout. This methodology fails to consider that ballot harvesting would likely increase both percentages proportionally. Contrary to its title, the report does not enhance election transparency but attempts to substitute for the real election transparency need of making physical ballots public record.

25. *"MITRE collected data on the absentee by mail ballots requested and returned to check for unusually high or unusually low return rates. According to the report, a statistical analysis of ballot return rates shows no anomalous points; no suspicious indicators of ballot harvesting"*

A scientific [critique](#) published by a group of professionals led by John Droz pointed out that a more in-depth analysis of the data used by the Mitre report shows the report reached premature conclusions. The critique found:

*"Fulton County especially stands out as having a large discrepancy between requested and returned ballots when compared with other counties of similar size (note both axes are still on a log scale). Points are colored by the fraction of mail votes Biden won in the election. Contrary to the MITRE Report's quick conclusion, the same plot when viewed with increased resolution leaves open the clear possibility that harvesting did in fact occur — and with sufficient magnitude to change the Georgia 2020 Presidential election results.*

*To summarize, the MITRE team concluded that since county mail-ballot data fall on or near the trend line based on simple visual inspection, the ballots were not mis-handled. A*



***more detailed analysis shows there are in fact outliers of sufficient magnitude to influence the election outcome. How those occurred justifies further investigation.***

***Georgia voter data posted on various sites for the four most populous counties shows 1,654,500± absentee ballots were mailed to voters in those four counties. Of those receiving a mail-in-ballot, 922,000± voters chose to vote in person. There is no mention of how those 732,000± purportedly unused mailed-out ballots were handled."***

#### **D. ALLEGATIONS REGARDING POLL WATCHERS**

26. *"There have been numerous reports of insufficient access for poll watchers or public monitors. Ironically, those reports are all made by poll watchers or other public monitors, showing that they were in fact highly involved in the process and monitoring each step of the way."*

**Poll watchers and audit monitors for the November 2020 and January 2021 runoff election constantly complained that they were prohibited from becoming meaningfully involved in the monitoring process. For example, they wrote affidavits or complained in writing to poll watcher coordinators such as the co-author of this document that:**

- They were not allowed to get within 6' of any election activities;
- They were not allowed to monitor the hand count audit data upload point;
- They were placed in a corner where they could not visually see many activities;
- They were refused access altogether at the polling location;
- They were improperly denied credentials altogether.

**Many of these complaints define inappropriate restrictions placed upon poll watchers or audit monitors in conflict with Georgia election transparency laws. They show repeatedly that poll watchers and audit monitors were not involved in process and monitoring as they should have been.**

**These complaints have been further confirmed by one or more [lawsuits](#) that have been filed on behalf of Election Day poll watchers associated with Fulton and Cobb County putting physical barriers preventing poll watchers in fulfilling their legal responsibility.**

27. *"Throughout this election cycle, my office has told Georgia counties to ensure transparency and openness and, when any questions arise, to err on the side of transparency. "*

**On the contrary, the SOS's former Election Director, Chris Harvey specifically erred AGAINST transparency with the concurrence of SOS's Legal Counsel Ryan Germany. He [refused](#) to tell Cobb and Fulton counties to allow Constitution Party of Georgia (CPGA) monitors during the November 2020 audits even though the CPGA had a qualified write-in candidate on the ballot. Harvey sent counties a bulletin containing instructions that directly conflicted with O.C.G.A. 21-2-495. When confronted with the law in an Email from CPGA Chairman Ricardo Davis, he erred AGAINST transparency, not for it, by refusing to correct his bulletin. Both Fulton and Cobb County election procedures and results are still being called into question today.**



## **Refutation of Georgia Secretary Brad Raffensperger's False Election Claims**

28. *"We ensured monitors had access and that the public could observe the hand audit and recount, in addition to the regular laws that govern partisan poll watchers on Election Day and early voting."*  
**The actual conditions explained in the previous two points show that monitors did not have acceptable access and the public could not meaningfully observe. In addition, the attempt to block the CPGA from monitoring the elections process for their candidate conflicts with Georgia election transparency law.**
29. *"The most prominent allegation of issues with monitors took place in State Farm Arena, where Fulton County conducted its absentee ballot processing. Unfortunately, due to what appears to be a miscommunication between county staff and poll watchers, the poll watchers left at 10:30 p.m. on election night when they thought Fulton was done scanning for the night. Fulton denies ever telling monitors that they had to leave."*  
**There was no miscommunication. Sworn affidavits from monitors [Michelle Branton](#) and [Mitchell Harrison](#) explain how a Fulton elections supervisor announced that all workers should stop and come back in the morning (not that the monitors had to leave). The State Farm Arena video clearly shows the supervisor making the announcement and thus it corroborates both affidavits. The video further shows the monitors stayed for approximately another half hour while Fulton employees closed down the operation. The monitors left once they became wrongly convinced that scanning would actually stop.**
30. *"Fortunately, a monitor designated by the State Election Board arrived shortly after the other poll watchers left."*  
**The State Election Board monitor arrived AFTER all scanning was complete for the evening and the employees had left. The State Farm Arena video shows that the monitor did not arrive until about 1:40am, 45 minutes after scanning had stopped for the night and Fulton County employees had left the premises around 12:55am.**
31. *"Partisan poll watchers and other monitors remained at Fulton County's election warehouse where results were being tabulated the entire time and were aware that absentee ballot scanning was continuing at State Farm Arena."*  
**Results were not tabulated continuously for the entire time of the election. Poll watchers and audit monitors at Fulton County's election warehouse, including the co-author of this report, were not aware as to whether or not ballot scanning was continuing at the State Farm Arena on election night.**
32. *"...review of the entire surveillance tape by both law enforcement officers with my office and fact checkers has shown that no untoward activity took place."*  
**On the contrary, the State Farm Arena video shows multiple likely violations of Georgia election transparency laws and other Georgia election laws:**
- **The use of a curved room with inadequate visibility for on-site observers such as the author of this report is a potential violation O.C.G.A. 21-2-406;**
  - **The use of skirted tables is also a potential violation of O.C.G.A. 21-2-406;**
  - **Hiding ballots underneath the skirted tables is a further potential violation of O.C.G.A. 21-2-406;**



## Refutation of Georgia Secretary Brad Raffensperger's False Election Claims

- Continuing to scan ballots without observation after announcing that scanning will stop is a potential violation of O.C.G.A. 21-2-483(b);
- Duplicate scanning of ballots that clearly did not experience paper jams requiring a rescan is a potential violation of Constitutional protections and legal provisions of conducting elections including O.C.G.A. 21-2-374, 21-2-419(c) and other statutes. Over 200 duplicate scanned ballots were found in ballot image reviews of the Fulton County results.

### E. ALLEGATIONS REGARDING INELEGIBLE VOTERS VOTING

33. *"The President's allies have alleged that 66,241 underage teenagers voted in Georgia in November. The actual number is 0. Our office compared the list of people who voted in Georgia to their full birthdays to determine this. 4 voters requested a ballot prior to turning 18, and all 4 turned 18 prior to the November 3 election."*  
**The actual number is not 0. In reality, 2,047 individuals who cast a vote in the November 2020 General Election were under the legal age of 17 when they registered to vote, according to the data published by the secretary of state. These facts were [derived](#) directly from the SOS's voter registration database from October 27, 2020.**
34. *"The President's allies allege that 2,423 people voted who were not registered to vote. The actual number is 0. Voters cannot be given credit for voting in Georgia unless they are registered to vote."*  
**The actual number is not 0. There are 4,502 registration numbers in the voter history file, which lists voters who were credited with voting in the November 2020 election, who did not appear in the voter registration file, which lists voters who are eligible to vote in the election. These facts are [based on](#) the Voter History File from November 28, 2020 and the Voter Registration file from October 27, 2020.**
35. *"The President's allies allege that 10,315 dead people voted. Our office has discovered 2 potential dead voters and both instances are under investigation. We will fully investigate all credible allegations of potential dead voters, but the allegation that a large number of dead people voted in Georgia is not supported by any evidence."*  
**The actual evidence shows that at least 873 people received credit for voting in the November 2020 election although they had died in 2020 prior to Election Day. This is [based on](#) the voter history file from November 28, 2020 and a deceased individuals file from the State of Georgia's Public Health Department. These files were matched on First Name, Last Name, Date of Birth and Address. The number is likely to be higher once matching for years prior to 2020 is taken under consideration or if a more complex matching technique is used.**
36. *"The President's allies allege that 1,043 people voted who were registered at addresses that are actually Post-Office boxes. A simple google search of this list revealed that many of the addresses that are alleged to be post office boxes are actually apartments."*  
**If the SOS did a simple search he would have [determined](#) that there are at least 907 voters who are registered to vote at Post Office Boxes in locations that are clearly not apartments. These Post Office Boxes are in U.S. Postal Service locations, UPS stores, Fed**





Ex locations, and other stores such as PAK mail, Anytime Mail and Postnet. These illegal voters are shown in the Absentee Early Voting file from November 16, 2020. Secretary Raffensperger has offered no explanation for these illegal Post Office Box registrations.

37. *"The President's allies allege that approximately 4000 people voted in Georgia who had subsequent voter registrations in other states. Our research into these people shows that these allegations rely on inaccurate and incomplete data. The detailed voter registration records on those voters reviewed so far show that they are legitimate Georgia voters.*

**The allegations are based on the SOS's Statewide Voter Database obtained in early November of 2020, the SOS's 2020 Voter History file, and U.S. Postal Service national change of address processing. If Secretary Raffensperger meant to admit that his department's data is inaccurate and incomplete then he should certainly take the initiative to correct it.**

38. *The President's allies also allege that there are approximately 15,000 people who voted in Georgia after having filed a National Change of Address with the U.S. Post Office indicating they had a new out of state address .... But our initial investigation indicates that the total number of illegal voters for any reason (no longer a Georgia resident, felon, double voter, etc.) will not be close to sufficient to place the result of the presidential election in Georgia in question."*

**Nearly 35,000 people who voted in the November 2020 election based on the 2020 Voter History file had submitted a change of address to the U.S. Postal Service (USPS) showing they moved to another county and gave the USPS a "Move Effective Date" more than 30 days prior to the election. This is based on the Statewide Voter Database obtained in early November of 2020, the 2020 Voter History file, and U.S. Postal Service national change of address processing.**

**The vast majority of these could not have cast a legal ballot under those circumstances because they no longer lived in the county where they voted. The number of this type of illegal voter alone greatly exceeds the 11,779-vote victory margin and is thus sufficient to place the results of the presidential election in Georgia in question.**

#### **F. CONCLUSION CLAIMS**

39. *The facts show that the claims asserted by the President and his allies about the voting machines used in Georgia are false.*

**The facts show that the claims asserted by Georgia Secretary of State Raffensperger about the voting machines used in Georgia are false or misleading and that the related claims asserted by the President and his allies are supported by evidence that SOS Raffensperger withheld in his letter.**

40. *The facts show that the claims that the 2020 election did not follow Georgia law on absentee ballots are false.*

**The facts show that the claims asserted by Georgia Secretary of State Raffensperger about absentee ballots and Georgia law are false or misleading and that the related claims**





## ***Refutation of Georgia Secretary Brad Raffensperger's False Election Claims***

**asserted by the President and his allies are supported by evidence that SOS Raffensperger withheld in his letter.**

41. *The claims that the election was not transparent or that monitors did not have the access to which they were entitled are false.*

**The facts show that the claims asserted by Georgia Secretary of State Raffensperger about the election being transparent and the access given to monitors are false or misleading and that the related claims asserted by the President and his allies are supported by evidence that SOS Raffensperger withheld in his letter.**

42. *The claims that there are a sufficient number of illegal voters to put the result of the Presidential contest in question are false.*

**The facts show that the claims asserted by Georgia Secretary of State Raffensperger about an insufficient number of illegal voters to put the result of the Presidential contest in question are false or misleading and that the related claims asserted by the President and his allies are supported by evidence that SOS Raffensperger withheld in his letter.**



### **III. SUMMARY**

In summary, this document provides 42 counterpoints with about 44 instances of references refuting 42 of Georgia Secretary of State Brad Raffensperger's statements in his 10-page January 6<sup>th</sup> letter to Congress. The counterpoints include electronically linked references to help the reader determine the actual truth about the November 2020 Georgia General election.

It is important to understand that the VoterGA has a **15-year track record as a non-partisan organization** advocating for election integrity and fair ballot access in Georgia. The co-founders have a combined 70 years of Information Technology experience and the co-author of this report has 20 years of part-time experience in voting system research and reporting. The co-founders are not associated with either of the two major political parties and it is a matter of court record that the co-author of this report did not vote for either of the two major presidential candidates. Thus, there is no more qualified of an organization in the state that could have produced this report.

As explained in the opening, the arguments contained in this report should come as no surprise considering an August, 2019 [U.S. District Court order](#) in the *Curling v. Raffensperger* case found the SOS office as **"not credible"**. The office repeatedly misled and deceived the court as clearly and meticulously explained in two scathing orders totaling 300 pages from Judge Amy Totenberg. Judge Totenberg reviewed what is arguably the most comprehensive set of evidence ever presented in a Georgia election case and concluded: ***"The Defendants have previously minimized, erased, or dodged the issues underlying this case. Thus, the Court has made sure that the past is recounted frankly in this Order, to ensure transparency for the future."***

Also, **Secretary Raffensperger also completely ignored all evidence collected by the Georgia General Assembly in writing his January 6 letter.** This includes comprehensive testimonies and evidence presented in the three separate December 2020 hearings previously mentioned. The Senate Judiciary Election Law Sub-Committee Report summarized the findings for just one of those hearings: ***"The oral testimonies of witnesses on December 3, 2020, and subsequently, the written testimonies submitted by many others, provide ample evidence that the 2020 Georgia General Election was so compromised by systemic irregularities and voter fraud that it should not be certified"***.

The overwhelming evidence now collected and presented in this report confirms the Judiciary sub-committee was correct in stating Georgia's 2020 Presidential election should not have been certified. There is a distinct possibility that Secretary Raffensperger certified the incorrect winner in Georgia's Presidential contest and possibly even one of the U.S. Senate races in the January, 2021 runoff. Yet even more evidence of this continues to surface on a weekly basis and the voters have not been adequately protected from the fraud, errors and irregularities for the upcoming 2022 primaries.

Bob Coovert (Mountain Patriots)  
Garland Favorito  
Co-founder





**IV. ADDENDUM**

When comparing the Georgia Pro V&V audit report to the Maricopa County Arizona Pro V&V Field Audit Report several important distinctions become evident. The Georgia report does not mention where the audits were performed, it simply state’s 6 counties. This is not verifiable and contrary to why an audit is conducted.

The Georgia audit report does not list the audited machines serial numbers or seal numbers which is imperative in order to ensure the machines were not tampered with and allows the machines to be traceable. The Georgia audit report does not list the software verification serial and seal numbers to ensure proper software and no tampering. These tables are examples from the actual Pro V&V report for Maricopa County, Arizona clearly identifying the actual machines, software, and seals.

**Table 3-1 ICP2 Software Verification Serial and Seal Numbers**

ICP2 Serial Number	Seal Number	
	Front	Back
FAL19460086	IS143365	1004649
FAL19460030	IS437104	1004719
FAL19330163	IS439376	1004217

**Table 3-2 ICP2 Hardware Verification Serial and Seal Numbers**

ICP2 Serial Number	Seal Number
FAL19380033	1004580
FAL19450257	***
FAL19320179	1004481
FAL19320062	1004029
FAL19450040	1004708

The Georgia audit report does not mention if actions were taken to identify the presence of malware, network analysis or meeting voting system guidelines. These methods were identified in the Maricopa audit report. The Georgia Audit Scope and the Maricopa Audit scope are listed below.

**Georgia Audit Scope**

**1.5 Scope**

Pro V&V randomly selected components of the D-Suite system (an ICP, an ICX, and an ICC) from the system in each county that had been utilized in the November 2020 General Election. It was at the discretion of the Pro V&V on-site team which units were subject to verification. The SOS office contacted the selected counties and arranged for the Pro V&V team to be granted access to the systems. The selected counties were given less than six hours’ notice before the Pro V&V team arrived.



## **Maricopa Audit Scope**

The Post-Election Field Audit evaluated the EMS and ICC workstations and servers by comparing the SHA-256 hash value to the known SHA-256 hash values. In addition, a malware detection tool was run on each workstation/server to establish whether any malware/virus or malicious software was running on the workstations/servers. Pro V&V utilized the tool to extract the firmware from a sample of thirty-five 4 | P a g e v. TR-01-03-MAR-01.00 ICP2 units. These extractions were then placed on the Pro V&V laptop to generate the SHA-256 hash value for the firmware. These hash values were compared to known hash values for the Election Assistance Commission Federal Test Campaign. In addition to these evaluations, Pro V&V conducted a network analysis to ensure the network is a "Closed Network" incapable of reaching the internet Pro V&V also conducted an Accuracy Test to meet the requirements of the 2005 Voluntary Voting Systems Guidelines (VVSG).