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REPORT OF INVESTIGATION

&

VERIFIED SUPPLEMENTAL COMPLAINT

INVESTIGATION OF THE FULTON COUNTY 2020 GENERAL ELECTION IRREGULARITIES & FAILURES OF THREE COUNTS

EXECUTIVE SUMMARY

Georgia's 2020 General Election was not accurate, not credible, and the results cannot be verified. Core election records, including ballot images and logs have been destroyed; however, over the course of what has been a two-plus year investigation, many determinations have been made. Although this report is primarily focused on Fulton County, the problems documented herein do not stop at the county line. Forthcoming reports will detail the deficiencies in other counties.

Georgia's elections do not have checks and balances. There are no layers of redundancy or even basic accounting. The safeguards one would expect to be inherent in the process do not exist. Here are the facts:

Fulton County's Original Count results include the votes of 20,713 early voting ballots for which there are no poll tapes, ballot images, recap sheets or other records, whatsoever. What's more, at the end of early voting the security seals were broken and the memory cards were removed from all early voting tabulators. When the polls closed on Election Day the memory cards were inserted into surrogate machines and fraudulent poll closing tapes were printed. Those poll tapes for nearly 300,000 ballots were never signed, witnessed or certified as required by Georgia law.

This bears repeating. The legal hard-copy representation of nearly 300,000 ballots cast during early voting in Fulton County, were unlawfully printed from different tabulators which produced poll closing tapes bearing a different serial number and protective counter (tabulator odometer) number than that of the machine that scanned the ballots.

The 138 unlawfully produced and fraudulently identified poll closing tapes were not signed, they were not witnessed, and they were not certified. Additionally, ten tabulators and the votes of 20,713 ballots, have no poll tapes, ballot images or any other substantiating records. In any other facet of life, the uncertified, false, and fraudulent record of 313,885 ballots would render the Fulton County Certification of the 2020 General Election results “*void ab initio*”, or void from the beginning.

The results of the hand count/audit have been used by Georgia election officials to substantiate the results of the Election Day count because “they match”; however, such validation no longer exists. 36 errors were identified by Mr. Joseph Rossi which were validated by the Governor who referred the matter to the Georgia State Election Board (“SEB”). The SEB referred the complaint to the Georgia Attorney General who also validated the 36 errors and the over 6,000 false votes added to the Presidential race that did not exist.

Similarly, the results of the Recount as submitted at midnight December 02, 2020, was short some 17,000 ballots as compared to the official results of the Original Count. Nearly all of the shortfall was somehow found and scanned the following night. Strangely, some 17,000 ballot images are missing from the official record.

THE THREE COUNTS

Georgia’s 2020 General Election included three (3) separate counts:

1. November 3rd count (“original count”)
2. Hand Count / Audit
3. Machine Recount

1. ORIGINAL COUNT

Fulton County’s 2020 General Election included nearly three (3) weeks of in-person Advance (early), Absentee by Mail, drop-box, and Election Day voting.

A private post-election investigation attempted to verify the results by acquiring all election records, including the ballot images and the tabulator poll tapes. It was quickly discovered that Fulton County failed to save and preserve the in-person ballot images.¹ The only ballot images that Fulton County properly preserved in accordance with state and Federal law were the Absentee/Drop-Box ballots. All ballot images for in-person voting were destroyed.

Failing the ballot images, next sought were the tabulator poll tapes. There are primarily two (2) types of poll tapes- a poll open or “zero” tape, and a poll close tape. An open tape is printed before the polls open to establish that no ballots or votes are counted on each tabulator. A poll close tape is printed when the polls close on election night and is similar to a receipt for each tabulator.

¹ See Fulton County’s responses to Request for Admissions: [Fulton County Request for Admissions2 | PDF \(scribd.com\)](https://www.scribd.com/document/511111111/Fulton-County-Request-for-Admissions-2)

which shows the number of votes counted for each contest. The poll closing tape is the legal, hard-copy record of the tabulator count.

In response to Open Records Requests, only nine (9) open tapes and 138 unsigned, uncertified poll close tapes (printed on surrogate tabulators) were returned for early voting.² After all tapes were logged, verified, and totaled, it was determined that there were no tabulator poll closing tapes for 20,713 ballots. Using the Cast Vote Record (CVR) and a report generated by the Dominion election system called a “Batches Loaded Report” (“BLR”), the ten outstanding tabulators were identified. An Open Records Request for the ten identified and outstanding tabulator tapes was submitted to Fulton County. In response, Fulton County stated no such records exist. After a series of phone calls and emails, the Records Custodian was asked if the tabulator tapes were lost, destroyed, or do not exist. The response from Fulton County was that the requested records “do not exist”.

Subsequent efforts to validate the existence of the 10 early voting tabulators proved unsuccessful. In fact, the tabulators are not reflected in Logic & Accuracy testing records, nor equipment distribution, pick-up schedules, or logs. There are no ballot images, scanner recap sheets, poll open tapes, poll closing tapes, tabulator system logs nor any other records which document the existence of the ten machines. No records exist- except the unsubstantiated electronic results of 20,713 “ballots” attributed to the phantom tabulators.

During the course of what has been an over two (2) year investigation, we have uncovered and meticulously documented multiple failures with regards to the 2020 General Election, which include:

- a. No Logic & Accuracy testing was performed on any of the voting equipment used for Advance Voting in violation of Ga. Comp. R. & Regs. 183-1-12-.08.³
- b. The Georgia Secretary of State changed the protocol for Logic & Accuracy testing from the process specified in the 2020 Procedures Manual to a “truncated” process for the Election Day voting equipment. This issue was raised in the *Curling v. Raffensperger* case pending in Federal court. Judge Totenberg stated the following in her October 11, 2020, Order:

“...the Secretary of State’s January 2020 Procedures Manual is plainly inconsistent with the state statutory objective and requirements. The issue before the Court, though, is not whether any particular set of procedures is in full compliance with state law or a mere error in judgment by the Secretary of State’s Office. Voters do not have a First or Fourteenth Amendment constitutional right to perfect implementation of state statutory provisions guiding election preparations and operations. But they do have the right to cast a ballot vote that

² Poll closing tapes for advance voting can be found here: [Fulton 2020 Av Poll Tapes Certified | PDF | Elections \(scribd.com\)](#)

³ [Exclusive: Majority of Early Voting in Fulton County Done on Untested Machines - UncoverDC](#)

is properly counted on machinery that is not compromised or that produces unreliable results. L & A testing is not complex. It is tedious –but it is essential homework that protects the system and voters as the elections commence.”

- c. Logic & Accuracy testing was performed in-private and without providing the public proper notice in violation of Ga. Code § 21-2-379.25 (“*Public notice of the time and place of the test shall be made at least five days prior thereto*”).
- d. Logic & Accuracy testing was conducted and overseen by an unauthorized 3rd party, named Ryan Macias along with several others working on behalf of the Elections Group.⁴ What’s more, under the direction of Mr. Macias, Dominion technicians performed the mandatory testing at the cost of \$2,000 per technician, per day, and totaled more than \$2,000,000.00.⁵
- e. Ballot Marking Devices were reprogrammed across the state only days before the 2020 General Election with software that had not yet been tested nor submitted to the Election Assistance Commission for approval.
- f. Precinct tabulator memory cards were unlawfully replaced during a live election while the polls were open, and for reasons other than the excuses subsequently provided by election officials (storage capacity and lacking sufficient tabulator inventory- both disproven).⁶ It is important to note that this practice was not exclusive to just Fulton County but repeated in at least the three next-largest counties. Cobb, DeKalb, and Gwinnett also inexplicably replaced tabulator memory cards in violation of Ga. Comp. R. & Regs. 183-1-14-.02.
- g. At the end of early voting on October 30, 2020, the zip-tie seals were cut, and the memory cards were unlawfully removed from all tabulators. After the polls closed on Election Day the memory cards were inserted into surrogate machines on which the polls were closed and the poll closing tapes were printed.⁷ Mandatory reconciliation of the tabulator totals with the corresponding written logs (Scanner Recap sheets) as prescribed by Ga. Comp. R. & Regs. 183-1-14-.02, was entirely circumvented.
- h. The surreptitious process masked the serial number and protective counter (tabulator odometer) of the scanning tabulator, thereby rendering the critical processes of basic election accounting, reconciliation, and verification *impossible*. The actions detailed in this section were in violation of Ga. Comp. R. & Regs. 183-1-14-.02.

⁴ An Open Records Request for all contracts or agreements with or including Ryan Macias was submitted to Fulton County, who returned “No such Records”.

⁵ [Fulton County Paid Dominion \\$2M to Staff and Run Elections At Rate of \\$2k+/Person/Day - UncoverDC](#)

⁶ See corresponding SEB complaint file on March 28, 2022, here: [Fulton County Early Voting Complaint | PDF \(scribd.com\)](#)

⁷ Separately detailed in the above-referenced complaint.

- i. 138 fraudulently produced, unsigned, unwitnessed, and uncertified tabulator poll closing tapes, representing all of the approximate 293,172 ballots purportedly cast during the course of in-person early voting, make up the official record.⁸
- j. As described in the opening section, no poll tapes and no other records exist for ten Advance Voting tabulators and approximately 20,713 ballots purportedly attributed to the illusive machines.
- k. Of the 148,318 Absentee ballot images (produced under court order), only 16,038 have a corresponding SHA (Secure Hash Algorithm) ballot image authentication file.⁹ It is important to note that the absence of these select files is not possible due to mistake and is *highly* suspect.¹⁰
 1. The data of the ballot image files described above also suggest tampering for several reasons, including last modified timestamps, speed of transfer times, and the fact that the machines were programmed to send all Absentee ballots to adjudication.¹¹
 2. There also exists strong evidence which suggests that the ballot image files were replaced with different image files of the same name.
 3. Fortuitous is the fact that such manipulation would be detected with the SHA ballot image authentication files curiously missing from the official record (as produced by Fulton County under Court Order).
- l. Fulton County, among many others, failed to preserve all ballot images for in-person voting.¹²

Under a Court Order in the Curling v. Raffensperger case, Fulton County produced the election records for the 2020 General Election and Recount to the Curling Plaintiffs. The Declarations of two highly respected subject matter experts, Philip Stark, and Duncan Buell, were filed in the case each after performing their own independent analysis of the election records produced by Fulton County.¹³ From the Declaration of Duncan Buell (at 7):

“In Fulton County ballot images and their attached “AuditMark” tabulation interpretations are missing for approximately 360,000 BMD ballots and 6.4 million BMD votes they contain for in-person voting for the official certified count of all down ballot races.; Such electronic files are essential when testing the election records for consistency and accuracy. Significant numbers of missing files inhibits a complete authoritative analysis of causes or effects of potential impacts of

⁸ A true and correct copy of all 138 tabulator tapes for in-person Advance Voting as certified by the Fulton County Custodian of Records can be found here: [Fulton 2020 Av Poll Tapes Certified | PDF | Elections \(scribd.com\)](#)

⁹ [Fulton County Ballot Image: What a SHAM! - UncoverDC](#)

¹⁰ A true and correct copy of the Declaration of election systems and data expert, Duncan Buell, can be found here: [20220111 Buell Expert Report Final Served | PDF | Election Recount | Voting \(scribd.com\)](#)

¹¹ [\(2\) Fulton County 2020 Absentee Ballot Results Were Physically Impossible and Files Were Modified \(substack.com\)](#)

¹² See a true and correct copy of Fulton County's responses to a request for admissions filed in the Curling v. Raffensperger case: [Fulton County Request for Admissions2 | PDF \(scribd.com\)](#)

¹³ The Declaration of Philip Stark can be found here: [Philip Stark CGG 9 | PDF | Government \(scribd.com\)](#); The Declaration of Duncan Buell can be found here: [Buell Expert Report Final Served | PDF | Election Recount | Voting \(scribd.com\)](#)

malware, software bugs, equipment malfunction, human error or malfeasance by insiders.”

Considering the state and federal legal requirements for preservation of election records, the failure of counties and the state to preserve core election records is not only unlawful, but highly suspect.

SUMMARY

The Fulton County Board of Registration and Elections (FCBRE) officially certified the 2020 General Election results based on 138 fraudulent, unsigned, unwitnessed, and uncertified (blank) poll tapes representing 293,172 ballots, along with no poll tapes or provenance whatsoever for an additional 20,713 ballots.

Certification of election results based on uncertified records is unjustifiable.

Fulton County’s November 03, 2020, election results are not supported by records or fact. Not just technically, but materially, and overwhelmingly. Fulton County’s official results of the November 3rd General Election Original count quite literally rest on nothing more than unsubstantiated, unverifiable, and unlawfully derived numbers ceremoniously adopted by a blind-folded county election board; however, certifying that something is true and correct without performing the due diligence required to ensure it is in fact true and correct, is fraudulent.

2. HAND-COUNT-AUDIT

By statute, a Risk Limiting Audit (“RLA”) was required to be performed following the 2020 General Election. The Secretary of State, for whatever reason, decided to perform a full hand count/audit. Georgia state election officials have repeatedly stated that *all* of the ballots were counted by hand, and that the results matched. It has been claimed repeatedly that the hand count audit results verified the original count results. The fact is that the results of the two counts did not match.

UNCOUNTED BALLOTS

First, during the hand-count audit uncounted ballots were *found* in the following counties:

- | | |
|-------------------|---------------------|
| 1. Fayette County | 2,755 ¹⁴ |
| 2. Floyd County | 3,060 ¹⁵ |
| 3. Douglas County | 293 ¹⁶ |
| 4. Walton County | 284 ¹⁷ |

A total of 6,392 ballots were found that had not been counted or included in the original count. Gabriel Sterling says that the discoveries are evidence that the system is working:

¹⁴ [Second Georgia county finds previously uncounted votes | AP News](#)

¹⁵ [Floyd County Finishes Hand Recount, Adding 3,060 Votes - Coosa Valley News](#)

¹⁶ [293 votes found during hand recount in Douglas | Local News | douglascountysentinel.com](#)

¹⁷ [4th Georgia county finds uncounted votes as hand count deadline approaches \(news4jax.com\)](#)

"The hope is we don't find any more of these counties with you know, a couple of hundred here or 3,000 votes there, but the reason you do the audit is to find these kinds of human errors and then make sure that they are corrected,"¹⁸

Mr. Sterling's logic is simply wrong. The 6,392 ballots that were found during the hand count were not known to exist until they were discovered. This is only possible in the *absence* of basic election accounting and reconciliation. Traditionally, upon the closing of the polls the number of voters that check-in at a polling location, the number of paper ballots, and the number of ballots cast as calculated by the voting machine are compared. These three numbers should match. Like the 3 legs of a stool, they must all be equal. Had proper accounting and reconciliation been performed at the polling location it would have been immediately clear that ballots remained outstanding and uncounted.

The belated discovery of uncounted ballots in just one county is in and of itself indicative of failure. Finding uncounted ballots in (at least) 4 separate counties strongly suggests the existence of a widespread and systemic problem. Georgia election officials contend that *all* ballots were hand counted but do not define "*all*". There was no metric with which to gauge how many ballots were supposed to be counted because there was no reconciliation or accounting, whatsoever.

The reason that the hand count/audit results seemed to "match" those of the original count is because the counties' results were *recertified* to include the uncounted ballots that were found. In short, the results of the first count were changed after the fact to match the hand count. The hand count audit *did not* verify the election results of the original count.

Third, the hand count/audit was not conducted entirely by hand. Batches of ballots were counted by hand and then the totals were entered into a state-wide audit software program called ARLO. The software was provided by VotingWorks who was contracted by the Secretary of State. The software performed the aggregation of the data and then provided counties with their results. This was not an organic "bottom-up" exercise, but the opposite. Berkeley Prof. Philip Stark, Ph.D., inventor of the Risk Limiting Audit and highly respected election systems and processes expert stated the following about Georgia's hand-count/audit in a Declaration filed in the Curling v. Raffensperger case:¹⁹

"Fulton County's chaotic, unaccountable curation and processing of cast ballots, cast BMD printout, and electronic records make a true risk-limiting audit impossible. It is unreasonable for voters to trust that their votes were counted at all, much less counted correctly. Voters have good reason to believe that some votes counted more than others: some votes were included twice or thrice in the totals. There is no way to know how many votes were omitted from the tabulation, absent access to the physical ballots and BMD printout and evidence that the chain of custody is intact. From the records produced so far, it is impossible to determine whether malware, bugs, misconfiguration, or malfeasance disenfranchised voters or altered the election results."

¹⁸ [Refuting falsehoods, Georgia election officials defend integrity of audit, election - Good Morning America](#)

¹⁹ A true and correct copy of the Declaration of Philip Stark can be found here: [Philip Stark CGG 9 | PDF | Government \(scribd.com\)](#)

FULTON COUNTY'S THIRTY-SIX DOCUMENTED HAND-COUNT ERRORS

The hand count audit records have since been found to be riddled with errors. Two Georgia voters, Mr. David Cross and Mr. Joseph Rossi, found multiple discrepancies, duplications, and

mistakes in Fulton County's hand count records. Mr. Rossi specifically documented thirty-six errors and provided the same to Georgia Governor Brian Kemp for further review. Over a period of several weeks the Governor's office recreated and verified Mr. Rossi's findings, and on November 17, 2021, Governor Kemp issued a letter referring the matter to the State Election Board for investigation.²⁰ In addition, the Governor provided a report detailing each of the 36 inconsistencies as verified by his office.²¹

Only for the relentless efforts of Mr. Rossi over a period of some nineteen months, the matter known as SEB 2021-181 resulted in quiet confirmation of the errors. This came in the form of a privately negotiated consent agreement between the Georgia Attorney General and Fulton County. The same was ratified and adopted by the State Election Board on June 21, 2023, by a four-to-one vote.²² What's interesting is that three (3) members of the board voted to adopt the agreement *sight unseen*. At the time of the vote, only former Chairman William Duffey had read the consent agreement, to which the former Federal judge failed to provide the members of the board.

What's more, it was discovered by the complainant that at least some of the board members did not have access to the consent agreement at the time of the vote, therefore he inquired with the other board members. Email records show that subsequent to the complainant's inquiry, Chairman Duffey proceeded to interrogate and intimidate the board member who disclosed the facts. When asked by the complainant if the board member had read the consent agreement, she simply answered honestly and said that she "*didn't have it*". It is clear from the ensuing email exchange that Chairman Duffey was only concerned, not with the merit of the problem, but only how it was leaked.

Although the agreement did acknowledge the fact that Fulton County made errors in their hand count audit, the details and magnitude of those errors were omitted. It was only said that the errors were unintentional, and the result did not change the outcome of the race. The fact is that the result of the twice-verified 36 inconsistencies falsely attributed 5,618 votes to Joe Biden, and 1035 votes to President Trump that did not exist.²³ The net result of the hand count corrections reduced the margin of victory by 4,583 votes, from 11,779 to 7196 in one county alone. It is also interesting that 35 of the 36 errors, and eighty percent of the false votes favored Joe Biden.

²⁰ [Brian Kemp Georgia SEB Letter Joe Rossi 11.17.2021 \(1\) | PDF \(scribd.com\)](#)

²¹ [Brian Kemp Audit Inconsistencies Report Joe Rossi 11.18.2021 | PDF | Absentee Ballot | Evaluation Methods \(scribd.com\)](#)

²² [Signed - Consent Order SEB 2021-181 and 2022-025 \(Fulton County\) With Exhibit A - Redacted | PDF \(scribd.com\)](#)

²³ A true and correct copy of the 36 errors and the itemized breakdown of votes is available upon request.

Lastly, the consent agreement failed to take any punitive or even corrective action. Fulton County is simply required to do what it was already required to do- follow the law. Sadly, the agreement does not even require Fulton County to publicly correct the official hand count/audit results, nor those on the SOS's website.

SUMMARY

In conclusion, the hand count audit ***did not*** verify nor authenticate the results of the original count. It has now been officially established that there is a difference of at least 6,695 votes between the original count results and that of the hand count, after a private audit of only one county (not including the changes/corrections made to the original count results for the 6,392 ballots that were found). The hand count/audit is now an official benchmark to show that the Original Count *was not* credible. From the Declaration of Philip Stark:²⁴

“A rigorous audit can provide confidence that a well-run election found the true winner(s). But it cannot compensate for using untrustworthy technology to record votes or for a poorly run election; in such circumstances, it distracts attention from the real problems rather than improving election integrity and justifying confidence in electoral outcomes. Absent a trustworthy record of the votes, no procedure can provide affirmative evidence that the reported winner(s) really won. Georgia lacks such a record, for many reasons, including the heavy reliance on BMDs and the lack of physical accounting of ballots, memory cards, and other election materials; lack of pollbook and voter participation reconciliation; etc.

By claiming to perform risk-limiting audits when its paper trail is not trustworthy, the State of Georgia is in effect adding stories to a building that needs its foundation replaced. First things first.”

This begs the question as to how the results of the original count and those of the hand count were said to have matched before these “errors” were discovered? The only plausible explanation is that the 6,695-vote discrepancy was not the product of mistake. Furthermore, the hand count/audit no longer props up the results of the discredited original count, but instead provides further cause to question those results.

3. MACHINE RECOUNT

Following the certification of the November 3, 2020, General Election, President Trump's campaign requested an official recount which is referenced herein as the Recount. Pursuant to Georgia Law, a recount is performed by machine. The Recount began on November 24, 2020, and lasted until the prescribed deadline of midnight Wednesday, December 2, 2020.

²⁴ A true and correct copy of the Declaration of Philip Stark can be found here: [Philip Stark CGG 9 | PDF | Government \(scribd.com\)](#)

With only minutes to spare, Fulton County submitted the results of the Recount. At approximately 12- noon the following day, Fulton County Elections Director Rick Barron sends an email to Ryan Macias with the recount results attached, totaling 511,543 votes. 17,234 votes *less* than the November 3rd original count.²⁵ Between the time of the email and the official certification of the recount results some 24 hours later, Fulton County found 16,382 votes, -nearly all of the shortfall. The details which yielded the vote difference during the interim period is the subject of a complaint filed with the SEB-2023-025 (July 08, 2022), which, at the time of this writing, remains under investigation.²⁶

Through an exhaustive and multi-faceted investigation and analysis, the recount results verifiably include 17,852 votes with no corresponding ballot images. In addition, 3,125 ballots were found to have been counted twice. The 17,852 unsubstantiated votes, plus the 3,125 duplicates, together total 20,977 illegitimate votes which were included in the Recount results. It is important to note that the Recount is the only official results for the contest of the Office of the President.

As detailed in the first section, the original November 3rd count includes the results of 20,713 ballots for which there are no ballot images, corresponding tabulator poll open or close tapes, nor any other substantiating documentation whatsoever. Like that of the original count, the Recount includes the results for 20,977 ballots for which there are no ballot images or any other documentation.

ILLEGITIMATE BALLOT BREAKDOWN AND VOTE DISTRIBUTION

BALLOT RECORDS WITH NO BALLOT IMAGE

Using the Cast Vote Record (CVR), Batches Loaded Reports for the Recount, and the ballot images for the Recount (produced under court order), 17,852 records with no corresponding ballot images were identified.²⁷ From these records, the corresponding votes which were recorded for the contest of President of the United States were counted and the sum for each candidate is shown below.

SUM OF RECORDED VOTES FOR RECORDS WITH NO BALLOT IMAGES:

Donald J. Trump (I) (Rep)	Joseph R. Biden (Dem)	Jo Jorgensen (Lib)	Blank Contest	Write-in	Grand Total
4319	13390	107	34	2	17852

²⁵ [582622243 Moncla and Rossi Complaint 07/08/2022 | PDF | Elections | Science \(scribd.com\)](#)

²⁶ Case Number 2023-025 [582622243 Moncla and Rossi Complaint 07/08/2022 | PDF | Elections | Science \(scribd.com\)](#)

²⁷ See list of all 17,852 Cast Vote Records (CVR) for which there are no corresponding ballot images, here: [Fulton County Recount Missing Ballot Images | PDF | Federal Elections Of The United States | Democracy \(scribd.com\)](#)

DUPLICATE BALLOT IMAGES

Duplicate and triplicate ballot images were identified using a combination of methods, such as identification of 2 or more batches in the Cast Vote Record (CVR) with mirrored series of ballot types in the same sequential order.

For the Recount all ballots were scanned in batches each containing approximately 100-300 ballots. Different ballot styles (for different precincts, etc.) each have a unique code called a Ballot ID or Combo Code. The CVR data shows each batch and each ballot’s Ballot ID or Combo Code in the order in which it was scanned. Therefore, batches are searched for matching series of Ballot ID’s or Combo Codes that have been scanned more than once. The ballot images are then visually compared side by side to determine if the two images are of the same ballot. Prof. Philip Stark made the following statement regarding the duplicate ballot images in his Declaration:²⁸

“The full extent of this multiple-counting problem cannot be determined without additional discovery, but there is ample evidence that it added thousands of bogus votes to the reported machine-count results. That is, thousands of Fulton County voters’ votes were included in the reported totals more than once.”

The Recount includes 3,125 verified duplicate ballots that were in fact counted.²⁹ The records for each of the duplicated ballots were identified. From these records, the recorded votes for the contest of President of the United States were counted and the sum for each candidate is shown below:

SUM OF RECORDED VOTES FOR VERIFIED DUPLICATE BALLOTS:

Donald J. Trump (I) (Rep)	Joseph R. Biden (Dem)	Jo Jorgensen (Lib)	Blank Contest
1383	1565	52	16

RECONCILIATION OF RESULTS

	Donald J. Trump (I) (Rep)	Joseph R. Biden (Dem)	Jo Jorgensen (Lib)	Blank Contest
ILLEGITIMATE	4319	13390	107	34
DUPLICATE	1383	1565	52	16
TOTAL	5702	14955	159	50

	Donald J. Trump (I) (Rep)	Joseph R. Biden (Dem)	Jo Jorgensen (Lib)	Blank Contest
OFFICIAL RESULTS	2,461,854	2,473,633	62,229	
ILLEGITIMATE	5702	14955	159	50
	2,456,152	2,458,678	62,070	

²⁸ A true and correct copy of Philip Stark’s Declaration can be found here: [Philip Stark CGG 9 | PDF | Government \(scribd.com\)](#)

²⁹ Data set available upon request.

When corrected for the documented illegitimate ballots in Fulton County alone, the margin of victory for the race for President of the United States is reduced to 2,526 votes.

EVIDENCE OF ELECTION RESULTS MANIPULATION

DIFFERENT BALLOTS SCANNED FOR ORIGINAL & RECOUNT

The paper ballots scanned and counted for the original count, are in large number, not the same paper ballots as those scanned and counted for the Recount. What follows are three separate metrics of different data points that are calculated and recorded for each of the two counts and then compared.

It is important to note that the variables contemplated herein are immutable characteristics which should not deviate from the Original Count to the Recount. Unfortunately, analysis of Fulton County's own records reveal that is not the case. Each separate comparison corroborates the next and to the ultimate conclusion that not only do the two counts fail to mirror one another, but that the official records fail to support either count.

1. BALLOTS UNIQUE TO ORIGINAL COUNT & RECOUNT- NOT COMMON TO BOTH

A digital signature was created for each ballot record (variables include ballot style, precinct, contest selections, voting method, etc.). The quantity of each unique signature was calculated for each count and then compared. This process revealed many ballots which were included in only one count.

- a. At least 10,196 ballots are included in the Original Count that are not included in the Recount.
- b. At least 9,345 ballots are included in the Recount that are not included in the Original Count.
- c. A total of 19,541 ballots are in one count and not the other.

The same ballots should appear in both the Original Count and the Recount. The total number of ballots unique to each count are in question and far surpass the margin of victory.

2. BALLOTS WERE ATTRIBUTED TO DIFFERENT PRECINCTS FOR EACH COUNT

Ballots are each printed with a Ballot ID that is unique to only one precinct. Therefore, the same number of ballots should be attributed to the same precincts for both the original count and the Recount.

- a. 125 precincts received a total of 1,983 more ballots for the Recount than the original count.
- b. 215 precincts received a total of 2,835 less ballots for the Recount than the original count.
- c. A total of 4,818 ballots which were attributed to different precincts between the two counts.

FIVE EXAMPLE PRECINCTS:

# 3.a) The Net Change in results from Election Night to the Recount hides material vote losses at the precinct level																		
Election Night - SOS - Official Results					Trump					Biden					Election Night			
Precinct	Registered	Times Cast	Under	Over	Total Votes	Election Day	Advanced	Absentee Mail	Provisional	Total	Election Day	Advanced	Absentee Mail	Provisional	Total	Total POTUS	Total Counted	
02L2	2,249	1,550	2	0	1,548	44	140	36	2	222	105	829	375	5	1,314	1,546	1,548	
03I	1,607	670	3	0	667	25	44	13	7	89	95	332	115	17	559	664	667	
06D1	2,539	1,506	3	1	1,502	52	202	43	2	299	55	954	166	3	1,178	1,494	1,498	
08N1	824	679	6	0	673	25	219	73	1	318	11	194	131	2	338	671	677	
08N2	1,616	1,235	15	0	1,220	44	271	136	1	452	49	411	294	2	756	1,219	1,234	
https://results.enr.clarityelections.com/GA/Fulton/105430/web.264614/#/summary																		
Recount - SOS - Official Results					Trump					Biden					Recount			
Precinct	Registered	Times Cast	Under	Over	Total Votes	Election Day	Advanced	Absentee Mail	Provisional	Total	Election Day	Advanced	Absentee Mail	Provisional	Total	Total POTUS	Total Counted	
02L2	2,249	1,395	3	0	1,392	0	140	36	1	177	0	827	373	5	1,205	1,392	1,395	
03I	1,607	540	4	0	536	0	44	13	9	66	0	331	111	15	457	534	538	
06D1	2,539	1,390	4	0	1,386	0	202	44	2	248	0	951	164	1	1,116	1,379	1,383	
08N1	824	636	6	0	630	0	219	73	1	293	0	191	131	1	323	628	634	
08N2	1,616	1,119	15	0	1,104	0	271	132	0	403	0	405	287	0	692	1,103	1,118	
https://results.enr.clarityelections.com/GA/Fulton/107292/web.274956/#/summary																		
Results Change from Election Night to Recount					Trump					Biden					Vote Count Variance			
Precinct	Registered	Times Cast	Under	Over	Total Votes	Election Day	Advanced	Absentee Mail	Provisional	Total	Election Day	Advanced	Absentee Mail	Provisional	Total	Total POTUS	Total Counted	% Delta Counted
02L2	0	(155)	1	0	(156)	(44)	0	0	(1)	(45)	(105)	(2)	(2)	0	(109)	(154)	(153)	-9.9%
03I	0	(130)	1	0	(131)	(25)	0	0	2	(23)	(95)	(1)	(4)	(2)	(102)	(130)	(129)	-19.3%
06D1	0	(116)	1	(1)	(116)	(52)	0	1	0	(51)	(55)	(3)	(2)	(2)	(62)	(115)	(115)	-7.7%
08N1	0	(43)	0	0	(43)	(25)	0	0	0	(25)	(11)	(3)	0	(1)	(15)	(43)	(43)	-6.4%
08N2	0	(116)	0	0	(116)	(44)	0	(4)	(1)	(49)	(49)	(6)	(7)	(2)	(64)	(116)	(116)	-9.4%
5 Example Sum:		(560)	3	(1)	(562)	(190)	0	(3)	0	(193)	(315)	(15)	(15)	(7)	(352)	(558)	(556)	

Any change in the number of ballots attributed to a precinct from the original count to the Recount is inexplicable as Ballot ID and precinct are fixed, immutable characteristics. The wholesale changes documented here can only be explained by electronically manipulated results or through the scanning of different ballots. There is no third option.

3. VOTER CREDIT DOES NOT MATCH BALLOTS CAST FOR EITHER COUNT

When a voter returns an Absentee by Mail ballot, or when a voter checks-in at a polling location, the voter receives “credit” for voting. In other words, the Voter History File (VHF) is updated to show that a particular voter cast a ballot. Each voter can only be associated with one type of ballot style that is called a Ballot ID. All people living at the same location will have the same Ballot ID. Whereas someone in a separate school district or other designation will have a different Ballot ID with corresponding contests on their ballot.

A Voter’s precinct and Ballot ID are irrevocably tethered and therefore when a ballot is cast, the corresponding voter credit and cast ballot should always be attributed to the same precinct.

Fulton County’s election records reveal wildly different attributions of voter credit from the Original Count to the Recount.³⁰ Moreover, the VHF doesn’t match either count when there should be no significant variance between voter credit and ballots cast at all.

PRECINCTS WITH:	Original Count	Recount
MORE VOTES COUNTED THAN CAST CREDITS	3,402	3,831
MORE CAST CREDITS THAN VOTES COUNTED	1,528	2,809

The fact that there is such deviation between variables that should reconcile and remain static for both counts is indicative of manipulation. The fact that voter credit and ballots cast are changing from one count to the next essentially rules out any type of error as the error would remain constant.

It’s important to note that the numbers for this analysis – including both counts and the VHF are from the Georgia Secretary of State. Please see the attached spreadsheet for the breakdown of each precinct and the corresponding ballots cast versus voter credit attached hereto as “Exhibit F”. This too can only be explained by electronically manipulated results or through the scanning of different ballots. There is no third option.

4. INTENTIONAL MANIPULATION

Through an ongoing collaborative effort with P. Davis, *thousands* of ballots have been identified across multiple counties that appear only in the Recount and not the original

³⁰ Source of data set available here: [Georgia Election Results | Georgia Secretary of State \(ga.gov\)](https://www.ga.gov/electionresults)



count. This includes hand-marked paper ballots, QR code ballots, duplicate ballots and ballots which only have votes for the Presidential race. What's more, these ballots with only votes for the Presidential race often appear together in batches with others of the same type and include ballots for multiple precincts within the same batch. It is important to note that there is no known plausible explanation for this and can only be interpreted as a coordinated and intentional effort to falsely manipulate the results of the Recount.

Although our analysis and investigation is ongoing and overall scope remains unknown, there is sufficient evidence to warrant an investigation by the State Election Board. Supporting evidence and a preliminary report is being drafted and will be forthcoming in the coming days.

CONCLUSION

The major failures, anomalies, and irregularities documented in this report for each of the three counts render the Original Count, the hand-count/audit, and the official Recount results, impossible. As established, there is no verifiable election record to support Fulton County's 2020 General Election results. The records that do exist are either conflicting, irreconcilable, or both. Furthermore, there is no way in which the existing election records were naturally created and have certainly been manipulated.