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12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **SOUTHERN DIVISION**

15 JOHN C. EASTMAN

16 Plaintiff,

17 vs.

18 BENNIE G. THOMPSON, *et al.*,

19 Defendants.

20 Case No. 8:22-cv-00099-DOC-DFM

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22
23
24
25 **Exhibit Q**
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27
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IN THE SUPERIOR COURT OF FULTON COUNTY

STATE OF GEORGIA

**DONALD J. TRUMP, in his capacity as a
Candidate for President, DONALD J.
TRUMP FOR PRESIDENT, INC., and
DAVID SHAFER, in his capacity as a
Registered Voter and Presidential Elector
pledged to Donald Trump for President,**

Petitioners,

v.

**RICHARD L. BARRON, in his official
capacity as Director of Registration and
Elections for Fulton County, JANINE
EVELER, in her official capacity as
Director of Registration and Elections for
Cobb County, ERICA HAMILTON, in her
official capacity as Director of Voter
Registration and Elections for DeKalb
County, KRISTI ROYSTON, in her
official capacity as Elections Supervisor
for Gwinnett County, RUSSELL
BRIDGES, in his official capacity as
Elections Supervisor for Chatham County,
KIM STANCIL, in her official capacity as
Director of Elections and Voter
Registration for Cherokee County,
SHAUNA DOZIER, in her official capacity
as Elections Director for Clayton County,
MANDI SMITH, in her official capacity as
Director of Voter Registration and
Elections for Forsyth County, AMEIKA
PITTS, in her official capacity as Director
of the Board of Elections & Registration
for Henry County, LYNN BAILEY, in her
official capacity as Executive Director of
Elections for Richmond County, DEBRA
PRESSWOOD, in her official capacity as
Registration and Election Supervisor for
Houston County, VANESSA WADDELL,
in her capacity as Chief Clerk of Elections**

CIVIL ACTION FILE NO.

for Floyd County, JULIANNE ROBERTS,)
 in her official capacity as Supervisor of)
 Elections and Voter Registration for)
 Pickins County, JOSEPH KIRK, in his)
 official capacity as Elections Supervisor)
 for Bartow County, GERALD MCCOWN,)
 in his official capacity as Elections)
 Supervisor for Hancock County, BRAD)
 RAFFENSPERGER, in his official)
 capacity as Secretary of State of Georgia,)
 REBECCA N. SULLIVAN, in her official)
 capacity as Vice Chair of the Georgia State)
 Election Board, DAVID J. WORLEY, in)
 his official capacity as a Member of the)
 Georgia State Election Board,)
 MATTHEW MASHBURN, in his official)
 capacity as a Member of the Georgia State)
 Election Board, and ANH LE, in her)
 official capacity as a Member of the)
 Georgia State Election Board,)
)
)
 Respondents.)

AFFIDAVIT OF BRYAN GEELS

Personally appeared before the undersigned officer, duly authorized to administer oaths, Bryan Geels, who, after being sworn, testifies and states as follows:

1.

I am an expert witness on behalf of Petitioner in the above captioned proceeding. I expect to testify on the following subject matters: (i) analysis of the database for the November 3, 2020 election for the selection of Presidential Electors in the State of Georgia (“State”); (ii) opinions regarding whether individuals identified in the State’s voter database were actually qualified to vote on Election Day; (iii) opinions regarding the quality of the data that the Georgia Secretary of State and county elections officials relied upon to administer the November 3, 2020 election.

2.

This is a statement of my relevant opinions and an outline of the factual basis for these opinions. The opinions and facts contained herein are based on the information made available to me in this case prior to preparation of this report, as well as my professional experience as an established data analytics and risk assessment expert. I reserve the right to supplement or amend this statement on the basis of further information obtained prior to the time of trial or in order to clarify or correct the information contained herein.

3.

I reviewed the following documents and data in arriving at my opinions:

- a. The Absentee Early Voting File, as maintained by Georgia's Secretary of State, which contains records of all voters in the State who voted absentee, either by mail or early in person, in the 2020 General Election. The data constitute official records which are public and publicly available online.
- b. The Voter Registration File, as maintained by Georgia's Secretary of State, which contains the full record of all voters who were registered to vote in the 2020 General Election.
- c. The Voter Registration File, as maintained by Georgia's Secretary of State, which contains the full record of all voters who were registered to vote in the 2016 General Election.
- d. Voter History 2020 General Election File, as maintained by, Georgia's Secretary of State, which contains the full record voters who cast a vote in the 2020 General Election.
- e. An official list containing information from death certificates for individuals who died in the State of Georgia in the calendar year 2020 (the "Deceased Individuals File"). This

file was obtained through an open records request with the Georgia Department of Public Health (GDPH). Nicole Medrozo, Associate General Counsel, Privacy Officer from the Georgia Department of Public Health, produced the file on behalf of GDPH.

f. An official list of felons in the State of Georgia (the “Inmate File”). This file was obtained through a request with the Georgia Department of Corrections (GDOC). Kenneth Mantle, Director Offender Administration at GDOC, provided the file.

4.

The data files above constitute official records which are public and publicly available online on the Georgia Secretary of State’s website. Once downloaded, I loaded the data into Power BI, a widely-used business software tool for conducting statistical analysis, and created a data model for analysis in order to assess the potential for fraudulent or invalid voter records contained in the State’s files.

5.

In addition, I discussed the facts of this matter with Petitioner’s attorney, Ray S. Smith III, and members of his legal team.

6.

I am a licensed CPA, and I own a data analytics consultancy firm, Geels Consulting, based in Seattle, WA. Before starting Geels Consulting, I worked for 9 years in public accounting at a large CPA firm. Based on my experience as an auditor working as a Senior Manager at a large CPA firm, I am an established data analytics and risk assessment expert.

7.

While I did not create or compile the source of the data—the State of Georgia's Elections Division did—I am familiar with accessing files on the internet generally, including those provided by state and federal governments. I am also an expert working with zip files, Microsoft Excel spreadsheets, Power Query, and Power BI.

8.

With respect to publications I have authored in the last 10 years, I have not authored any publications in the last ten years.

9.

I have been retained as an expert witness for Petitioner. I am being compensated for a flat fee of \$15,000.00

10.

I have not provided testimony as an expert either at trial or in deposition in the last four years.

11.

As set forth above, I have been engaged to provide expert opinions regarding analysis in the November 3, 2020, election of Presidential electors. Based on my review of the documents and data described above my discussions with statisticians and analysts working with me and at my direction, my discussions with the attorneys representing Petitioner, I make the following observations:

12.

From the State's database for the November 3, 2020 election, it is my opinion to a reasonable degree of scientific certainty that 4,502 individuals whom the State's database identifies as having cast a ballot show no record of having been registered to vote in the November 3, 2020 election.

13.

From the State's database for the November 3, 2020 election, it is my opinion to a reasonable degree of scientific certainty that 305,701 individuals have records indicating that they applied for absentee ballots more than 180 days prior to the general election (i.e., prior to May 6, 2020), exceeding the statutory maximum according to state law.

14.

From the State's database for the November 3, 2020 election, it is my opinion to a reasonable degree of scientific certainty that 92 individuals whom the State's database identifies as having cast a ballot show that they returned their absentee ballots before the ballot was issued to the voter.

15.

From the State's database for the November 3, 2020 election, it is my opinion to a reasonable degree of scientific certainty that 29 individuals whom the State's database identifies as having cast a ballot show that the absentee ballot was issued before the voter applied for the ballot.

16.

From the State's database for the November 3, 2020 election, it is my opinion to a reasonable degree of scientific certainty that 10 individuals have records indicating that the early in-person ballot was accepted either prior to the start or after the end of early in-person voting in the state of Georgia (i.e., prior to October 12 or after November 3).

17.

From the State's database for the November 3, 2020 election, it is my opinion to a reasonable degree of scientific certainty that 50 individuals have records indicating that the mail-in ballot was accepted before the earliest possible date that ballots could have been mailed per Georgia voting rules (i.e., September 15, 2020).

18.

From the State's database for the November 3, 2020 election, it is my opinion to a reasonable degree of scientific certainty that 2,664 individuals have records indicating that they were issued mailed absentee ballots prior to the earliest possible date that ballots could have been mailed per Georgia voting rules (i.e., September 15, 2020).

19.

From the State's database for the November 3, 2020 election, it is my opinion to a reasonable degree of scientific certainty that 98 individuals whom the State's database identifies as having cast a ballot show that they were registered after the last day a person could register to vote per Georgia voting rules (i.e., October 5, 2020).

20.

From the State's database for the November 3, 2020 election, it is my opinion to a reasonable degree of scientific certainty that 217 individuals who voted by mail-in ballot have records indicating that they applied for the absentee ballot, were issued the absentee ballot, and the ballot was returned all on the same day which seems like an impossible occurrence for a mail-in ballot to be applied for, accepted, ballot mailed to the voter, ballot received by the voter, and to have been returned all on the same day.

21.

From the State's database for the November 3, 2020 election, it is my opinion to a reasonable degree of scientific certainty that 2 individuals have records indicating that the ballot applications were rejected but whose vote was accepted and counted.

22.

From the State's database for the November 3, 2020 election, it is my opinion to a reasonable degree of scientific certainty that 13 individuals have records indicating that the ballot application date precedes the voters' registration date. The normal expected fact pattern is that an individual should be registered to vote before they apply for an absentee ballot.

23.

From the State's database for the November 3, 2020 election, it is my opinion to a reasonable degree of scientific certainty that there are 4 accepted votes whose matching record in the registration file has a name that is completely different from the name of the voter in the Absentee Early Voter file. Due to the simple method used to identify matching names, there are

likely more individuals whose vote was matched up to the wrong registration record, including the improper matching of similar names. These records are highlighted to show that Georgia's voter system allows a person to vote under another person's registration.

24.

From the State's database for the November 3, 2020 election, it is my opinion to a reasonable degree of scientific certainty that there are 66,247 individuals whom the State's database identifies as having cast a ballot whose records indicate that they were registered to vote prior to their 17th birthday.

25.

From the State's database for the November 3, 2020 election, it is my opinion to a reasonable degree of scientific certainty that there are 6,635 individuals whom the State's database identifies as having cast a ballot whose records indicate that they were added to the voter registration file subsequent to the 2016 general election (since they weren't listed in the 2016 Voter Registration File) but whose voter registration date precedes the 2016 election. This is a significant recordkeeping and data integrity issue as the fact pattern indicates that voters were added to the registration file after the 2016 election, but the registration date was manipulated and is unreliable.

26.

From the State's database for the November 3, 2020 election, it is my opinion to a reasonable degree of scientific certainty that there are 2,024 individuals whom the State's database identifies as having cast a ballot whose birth dates was changed when comparing the 2020 Voter Registration file birthdate to the related 2016 Registration file birthdate. This is a significant

recordkeeping issue as the fact pattern indicates that state's recordkeeping of voter birthdates is unreliable, at best, or were manipulated intentionally. I called one of the voters in this list, Nancy Dousharm, at 229-251-8408, and discovered that Nancy voted in-person and showed her ID at the early voting location. Her birthdate as shown in the 2016 registration file was confirmed to be correct as 1971. Her birthdate as shown in the 2020 registration file was changed to 1941. This fact pattern does not appear to be a case that can be explained by a clerical error, as the birthdate should not change, unless there was valid proof that the birthdate in the Registration records was recorded incorrectly. The questions that follow this fact pattern could cause a reasonable person to conclude that the birthdate in the Voter Registration File is not reliable and may have been manipulated.

27.

From the State's database for the November 3, 2020 election, it is my opinion to a reasonable degree of scientific certainty that there are 134 individuals whom the State's database identifies as having cast a ballot whose recorded birthdate is on or before 1915. I researched the individuals in this list and discovered that there were 10 individuals in this list who appeared to match up to an individual who was deceased prior to the election time period, 1 individual who matched to a felon, and 30 individuals who could not be identified.

28.

From the Deceased Individuals File and the State's voter database for the November 3, 2020 election, it is my opinion to a reasonable degree of scientific certainty that there were as many as 10,315 individuals who cast ballots in the November 3, 2020 election that were accepted and counted but who were deceased prior to Election Day. 8,718 of these individuals are recorded as

having perished prior to the date the State records as accepting their ballot. These matches are for individuals who appear in the 2020 Death files whose First Name, Last Name, and Birth Year match exactly to a record of a Georgia voter in the Voter History File. It should be noted that the death file obtained through the open records request contains death certificates only for individuals who died in calendar year 2020. In all likelihood, there would be significantly more matches if the population of deceased individuals was expanded to include persons who perished prior to calendar year 2020. It should also be noted that only the Birth Year is available for records of voters in the State's database. Because only a Birth Year is provided, there may indeed be false positives in the population—for example, due to the match of multiple people with a common name who were also born in the same year or to the omission of a suffix. The reliability of these matches could be improved and a full analysis conducted (i.e., for all individuals who perished prior to calendar year 2020) only by the State of Georgia, which alone has access to the full birth date records of its voters and the death certificates for each county for all calendar years prior to 2020.

29.

From the Inmates File and the State's voter database for the November 3, 2020 election, it is my opinion to a reasonable degree of scientific certainty that there could have been up to 2,560 individuals who cast ballots that were accepted and counted but who were inmates. 2,560 represents the number of individuals in the Active Inmate file whose First Name, Last Name, and Birth Year matched exactly to the Voter History File. It should be noted that, similar to the analysis in #17 for deceased individuals, only the Birth Year is available in the State's voter record files. This analysis therefore may also contain false positives due to the imperfect nature

of the match. The reliability of these matches could be improved and a full analysis conducted only by the State of Georgia, which alone has access to the full birth date records of its voters.

30.

The findings summarized above demonstrate that the state of Georgia's voting system which the state relies upon to produce accurate election results has numerous control deficiencies including unreliable data governance policies to help ensure that votes cast and counted are valid votes that comply with national and state election rules. Without a proper controls structures and data governance policies in place to govern the election, there is an increased risk of invalid or fraudulent votes being counted without detection. It is my opinion that the data relied upon by the Georgia Secretary of State and county election officials is either not trustworthy and cannot have been relied upon to conduct an election without serious risk of fraud; or, alternatively, if it is good data, indicates a significant number of fraudulent or invalid votes of a magnitude which calls into question the outcome of the Presidential general election.

31.

First, the State of Georgia maintains a database for the November 3, 2020 election, obtainable through the Georgia Secretary of State's website, which list records on voters who applied for an absentee or early voter status for the November 3, 2020 election, voters who are registered to vote in the State of Georgia for the November 3, 2020 election, and voters who are registered to vote in the State of Georgia for the November 8, 2016 election. I received these files in a table format with columns and rows which can be searched, sorted, and filtered. Each row sets forth data on an individual voter. The data for each file was loaded into a Power BI data model. The Tables were related together using the common key in each file:

- GA_ABEV_STW (“Absentee Early Voting File”): Voter Registration #

- GA_VF_20GCOB_STW (“Voter Registration File” or “Voter File”):

REGISTRATION_NUMBER

- GA_VF_16GCOB_STW (“Voter Registration File” or “Voter File”):

REGISTRATION_NUMBER

- Voter History 11 3 2020 (“Voter History File”): Registration Number

32.

Each of the observations summarized above were performed using the following filters and rationale:

General filter used to calculate vote counts across all observations:

(GA_ABEV_STW [Ballot Status] = A or GA_ABEV_STW [Ballot Status] = Blank()) AND
GA_ABEV_STW [Ballot Return Date] is not Blank()

33.

Records outside of these filters that are included in the Absentee Early Voting File should not be counted in vote totals because they do not represent accepted votes that were counted.

Filtering the Absentee Early Voting File as described above counts only the Absentee Early Votes that were accepted and counted.

34.

Voted Absentee Not in Voter File: There are 4,502 votes in this population. This is a list of early and absentee voters and election day voters whose ballots were accepted but whose voter

registration number in the Voter History File does not match up to a record in the Voter Registration File. In addition to the general filter, a filter was used to show records with a GA_VF_20GCOB_STW [REGISTRATION_NUMBER] = Blank() and Voter History 11 3 2020 [Registration Number] is not Blank().

35.

Voted Absentee, Applied Earlier than 180 Days Before the Election: There are 305,701 votes in this population. This is a list of Absentee Early Votes that were counted that had an Application Date before May 6, which is more than 180 days before the election. In addition to the general filter, a filter was used to show records with GA_ABEV_STW [Application Date] < 5/6/2020. Votes in this risk bucket are questionable because Absentee Ballots can only be requested up to 180 days before the election per the Georgia state rules found here:

https://sos.ga.gov/index.php/Elections/absentee_voting_in_georgia. May 6, 2020 is 181 days from November 3, 2020. Votes in this population appear to be tell a story that does not comply with voter laws in Georgia.

36.

Ballots Returned Before They Were Issued: There are 92 votes in this population. This is a list of Absentee Early Votes that were counted that had a Ballot Return Date before the Ballot Issued Date. A calculated field was create using the following formula: Ballots returned before issue date = If(GA_ABEV_STW[Ballot Return Date] < GA_ABEV_STW[Ballot Issued Date], 1, 0). This creates a field that displays a 1 for each record that had a Ballot Return Date before the Ballot Issued Date. In addition to the general filter, a filter was used to show records with [Ballots returned before issue date] = 1. Votes in this risk bucket are questionable because

Ballots, as a matter-of-fact, cannot be returned before they were issued. The logical fact pattern for an Absentee ballot is (1) voter applies for a ballot, (2) application is approved and ballot is issued to the voter, (3) ballot is filled out by the voter and the ballot is returned and accepted. Ballots cannot be returned before they are issued. Votes in this bucket should be investigated to understand why the data in the Absentee Early Voter file tells a story that does not follow the logical and expected chain of events.

37.

Ballots Issued Before Application: There are 29 votes in this population. This is a list of Absentee Early Votes that were counted that had a Ballot Issued Date before the Ballot Application Date. A calculated field was created using the following formula: Ballots issued before Application date = If(GA_ABEV_STW[Ballot Issued Date] < GA_ABEV_STW[Application Date], 1, 0). This creates a field that displays a 1 for each record that had Ballot Issued Date before Application Date. In addition to the general filter, a filter was used to show records with [Ballots issued before Application date] = 1. Votes in this risk bucket are questionable because Ballots, as a matter of fact, cannot be issued before the ballot was applied for by the voter. The logical fact pattern for an Absentee ballot is (1) voter applies for a ballot, (2) application is approved and ballot is issued to the voter, (3) ballot is filled out by the voter and the ballot is returned and accepted. Ballots cannot be issued before the ballot was applied for by the voter. Votes in this appear to tell a story that does not follow the logical and expected chain of events.

38.

Early Voter Accepted before October 12, 2020 or after November 3, 2020: There are 10 votes in this population. This is a list of Early Votes that were counted that had a Ballot Return Date before October 12 or after November 3. In addition to the general filter, a filter was used to show records with GA_ABEV_STW [Ballot Style] = "IN PERSON" and (GA_ABEV_STW [Ballot Return Date] < 10/12/2020 or GA_ABEV_STW [Ballot Return Date] > 11/3/2020). Early Votes are records with the "IN PERSON" code in the Ballot Style field in the Absentee Early Voting data. Votes in this risk bucket are questionable because the period for Early Voting is October 12, 2020 – November 3, 2020 per the Georgia state rules found here: <https://sos.ga.gov/admin/files/2020%20Revised%20Short%20Calendar.pdf>. Votes in this risk bucket appear to tell a story that does not comply with Georgia voter rules.

39.

Mailed Voter Received before they were Eligible to be Sent Out on September 15, 2020: There are 50 votes in this population. This is a list of Absentee Votes that were counted that had a Ballot Return Date before the earliest day for a registrar to mail an absentee ballot of September 15, 2020. In addition to the general filter, a filter was used to show records with GA_ABEV_STW [Ballot Style] = MAILED and GA_ABEV_STW [Ballot Returned Date] < 9/15/2020. Absentee Votes are records with the "MAILED" code in the Ballot Style field in the Absentee Early Voting data. Votes in this risk bucket are questionable because Absentee Ballots were not to be mailed until September 15, 2020 per the Georgia state rules found here: <https://sos.ga.gov/admin/files/2020%20Revised%20Short%20Calendar.pdf>. A ballot cannot be returned before they were eligible to be mailed out to voters. Votes in this bucket appear to tell a story that does not comply with Georgia voter rules.

40.

Active Mailed Voter Issued Before They Were Eligible to be Sent Out on September 15, 2020: There are 2,664 votes in this population. This is a list of Absentee votes that were issued before the earliest day for a registrar to mail an absentee ballot of September 15, 2020. In addition to the general filter, a filter was used to show records with GA_ABEV_STW[Ballot Style] = MAILED and GA_ABEV_STW[Ballot Issued Date] < 9/15/2020. Absentee Votes are records with the “MAILED” code in the Ballot Style field in the Absentee Early Voting data. Votes in this risk bucket are questionable because Absentee Ballots should not to be mailed to voters until September 15, 2020 per the Georgia state rules found here: <https://sos.ga.gov/admin/files/2020%20Revised%20Short%20Calendar.pdf>. A ballot should not have been issued before the date the ballots were eligible to be sent out to voters. Votes in this bucket appear to tell a story that does not comply with Georgia voter rules.

41.

Voters who both registered after the deadline of October 5, 2020: There are 98 votes in this population. This is a list of Absentee and Early Voters who both registered after the deadline of October 5, 2020. In addition to the general filter, a filter was used to show records with GA_VF_20GCOB_STW [REGISTRATION_DATE] > 10/5/2020. Votes in this risk bucket are questionable because October 5, 2020 was the last day a person could register and be eligible to vote in the November General Election per the Georgia state rules found here: <https://sos.ga.gov/admin/files/2020%20Revised%20Short%20Calendar.pdf>. A person voting in this election should not have registered to vote after the deadline of October 5. Votes in this bucket appear to tell a story that does not comply with Georgia voter rules.

42.

Absentee Votes Accepted with Same Application Date, Issue Date, and Return date: There are 217 votes in this population. This is a list of Absentee votes that were accepted that had the same Application Date, Issue Date, and Ballot Returned Date. A calculated field was create using the following formula: Same day (app, issue, return) flag = If(AND(GA_ABEV_STW[Application Date]=GA_ABEV_STW[Ballot Issued Date], GA_ABEV_STW[Ballot Return Date] = GA_ABEV_STW[Ballot Issued Date]), 1, 0). This creates a field that displays a 1 for each record that had the same Application Date, Ballot Issued Date, and Ballot Return Date. In addition to the general filter, a filter was used to show records with GA_ABEV_STW [Ballot Style] = "MAILED" and [Same day (app, issue, return) flag] = 1. Absentee Votes are records with the "Mailed" code in the Ballot Style field in the Absentee Early Voting data. Votes in this risk bucket are questionable because it would be strange to expect an absentee ballot to be applied for by the voter, application accepted by the registrar, ballot mailed to the voter, ballot received by the voter in the mail, and returned and accepted all on the same day. Votes in this bucket appear to tell a story that does not follow a reasonable fact pattern for mail-in ballots.

43.

Rejected Application Status with Accepted ABEV Status: There are 2 votes in this population. This is a list of accepted Absentee and Early Votes that were Accepted with a Rejected Application Status. In addition to the general filter, a filter was used to show records with GA_ABEV_STW [Application Status] = "R". There are 2 votes in this population. Votes in this risk bucket are questionable because if the application was rejected, the vote should not have been counted. Votes in this bucket appear to tell a story that does not follow the expected fact pattern.

44.

Ballot Application Date before Registration Date: There are 13 votes in this population. This is a list of accepted Absentee and Early Votes that were accepted with a Ballot Application Date before the Voter Registration Date. A calculated field was create using the following formula: Application Date before Registration Date = If(GA_ABEV_STW[Application Date] < RELATED(GA_VF_20GCOB_STW[DATE_ADDED]), 1, 0). This creates a field that displays a 1 for each record that had a Application Date before the DATE_ADDED. Per discussion with an employee in the Georgia Secretary of State office, the Date Added is the right field to be using for the registration date, because it will show the date the voter was added to the list. In addition to the general filter, a filter was used to show records with [Application Date before Registration Date] = 1. Votes in this risk bucket are questionable because the normal fact pattern one would expect when requesting an absentee ballot is to first get the voter registered and then, once registered, the voter can apply for an absentee ballot. Votes in this bucket appear to tell a story that does not follow the expected fact pattern.

45.

Non-matching Records – Voter Registry to Absentee Early Voter Record Name Match: This is a list of accepted Absentee and Early Votes that were accepted that matched up to an incorrect voter record in the Voter File. Two calculated fields were created: First Name match = left(GA_ABEV_STW[First Name],3) = left(RELATED(GA_VF_20GCOB_STW[FIRST_NAME]), 3) and Last Name match = left(GA_ABEV_STW[Last Name],3) =

left(RELATED(GA_VF_20GCOB_STW[LAST_NAME]), 3). These calculated fields display True if the first three characters of the Name field in the Absentee Early Voter file matches the first three characters of the related Name in the Voter Registration File. In addition to the general filter, a filter was used to show records with [First Name Match] = False and [Last Name Match] = False and GA_VF_20GCOB_STW [REGISTRATION_NUMBER] is not Blank(). There were 367 votes in this population. Scanning through the list, we picked out 4 records with a Name in the Absentee Early Voter file that was completely opposite of the Voter Registration File. As described earlier in the document, the common key between the Absentee Early Voter file and the Voter Registration File is the Registration Number. The Registration Number in the Voter File that matches to the Registration Number in the Absentee Early Voter file for these 4 records do not appear to be a valid match, because the name in the Voter File is completely different than the name in the Absentee Early Voter file. These records are highlighted to show that Georgia's voter system allows a person to vote under another person's registration.

46.

Voters Who Were Underage When Registered: There are 66,247 votes in this population. This is a list of accepted Absentee Early Votes that were accepted whose related Registration Date and Birthdate in the Voter Registration File are less than 17 years apart, meaning, according to the data, the voter was registered before they were 18. A calculated field was created Age when registered = DATEDIFF(Date(GA_VF_16COB_STW[BIRTHDATE]), 1,1), GA_VF_16COB_STW[DATE_ADDED], YEAR). Per discussion with an employee in the Georgia Secretary of State office, the Date Added is the right field to be using for the registration date, because it will show the date the voter was added to the list. In addition to the general filter, a filter was used to show records with [Age when registered] < 17. Votes in this risk

bucket are questionable because citizens are not eligible to vote until they are 18 year of age or older. In Georgia, we recognize that 17-year-old might have registered to vote in this election before they turned 18, so we excluded them from our population. Misinformation such as this cause a reasonable person to question the accuracy and credibility of the DATE_ADDED and BIRTHDATE field. Votes in this risk bucket appear to tell a story that does not comply with US voter regulations.

47.

Additions to the 2020 Voter File (when compared to the 2016 Voter File) with Registration Dates prior to the previous election date: There are 6,635 votes in this population. This is a list of accepted Absentee Early Votes that were accepted but did not match up to a record in the 2016 Voter Registration File, meaning, they were added to the registration list after the 2016 election yet display a registration date before the previous election. Voter on 2016 List = LOOKUPVALUE(GA_VF_16COB_STW[REGISTRATION_NUMBER], GA_VF_16COB_STW[REGISTRATION_NUMBER], GA_VF_20GCOB_STW[REGISTRATION_NUMBER]). This field looks at the related record in the 2016 Voter Registration File (matching REGISTRATION_NUMBER) and displays the REGISTRATION_NUMBER if there is a matching record found in the 2016 Voter Registration File. If the [Voter on 2016 List] field returns a blank value, this means that record did not match up to a record in the 2016 registration file. In addition to the general filter, a filter was used to show records with GA_VF_20GCOB_STW [DATE_ADDED] <> 2020 and [Voter on 2016 list] is Blank(). Per discussion with an employee in the Georgia Secretary of State office, the Date Added is the right field to be using for the registration date, because it will show the date the voter was added to the list. Votes in this risk bucket are extremely questionable because if a

voter was added to the registration list after the 2016 election, they should not have a DATE_ADDED (registration date) that was before the 2016 election. If these individuals were truly added to the registration list before the 2016 election, they should have been included in the 2016 Voter Registration File. The questions that follow this type of issues may cause a reasonable person to conclude that the DATE_ADDED in the Voter Registration File is unreliable or that data within the Registration file has been manipulated. Votes in this risk bucket appear to tell a story that does not follow a logical and expected fact pattern and point to serious data integrity issues.

48.

Inconsistent birthdates in the Voter Registration File: There are 2,024 votes in this population. This is a list of accepted Absentee Early Votes whose related record in the 2020 Voter Registration File shows a BIRTHDATE that does not match the related BIRTHDATE in the 2016 Voter Registration File. A calculated field was created: Change DOB Flag = $\text{if}(\text{GA_VF_20GCOB_STW}[\text{BIRTHDATE}] - \text{GA_VF_20GCOB_STW}[\text{DOB 2016 List}] < 0, 1, 0)$. This calculated field displays a 1 if the difference between the BIRTHDATE in the 2020 Voter Registration File and the BIRTHDATE in the 2016 Voter Registration File is not zero, meaning the Birthdate changed from 2016 to 2020. In addition to the general filter, a filter was used to show records where GA_VF_20GCOB_STW [BIRTHDATE] is not 1800 and [DOB 2016 List] is not Blank, 1881, 1891, or 1900 and Change DOB Flag is 1. This filter removes some of the noise of obviously incorrect birthdates from the 2016 Voter File. There are 2,024 voters whose birthdate changed from the 2016 Voter Registration File to the 2020 Voter Registration File. To understand the fact patterns describing an issue identified in this list better, we called a voter on this list: NANCY DOUSHARM at 229-251-8408. We learned that this

citizen voted early in-person and presented her ID when she voted. Her BIRTHDATE in the 2016 Voter Registration File was confirmed to be correct as 1971. Her BIRTHDATE in the 2020 Voter Registration File was changed to 1941, which is the incorrect BIRTHDATE. This issue cannot be explained by a data entry error, as there would be no reason to change the birthdate for an individual if the birthdate was already correct. Votes in this risk bucket appear to tell a story that does not follow a reasonable fact pattern and point to significant data integrity issues.

49.

Absentee Votes with Birthdate On or Before 1915: There are 134 votes in this population. In exhibit 16, you will notice that there are only 132 votes in the population. The reason for the difference is because the research on the old voters was already done on an old version of the file, and was retained, to keep the documentation of the research. In the exhibit, columns A through M are Georgia Secretary of State columns. Columns N through T include my documentation and notes from my research. The additional two votes included in the vote total for this population came through when the analysis was updated to the latest version of the Georgia Absentee Early Voter file which added records as the votes tallied later came in. The population of voters included in this list are voters in the Absentee Early Voter File with birthdates on or before the year 1915. In addition to the general filter, a filter was used to show records with GA_VF_20GCOB_STW [BIRTHDATE] <= 1915 and GA_VF_20GCOB_STW [REGISTRATION_NUMBER] is not Blank(). Voters in this population were deemed to be extremely risky as many of the votes match up to records that have obvious inaccurate birthdates in the voter file or people who may not be living. I researched and identified 10 individuals from this risk population that appear to match up to a deceased individual and 1 person from this list

who appears to have voted as a felon. 30 voters from this list were unable to be identified, and many of the people who were identified have obvious inconsistencies with the listed Date of Birth, so they may not be accurate matches. Details for the investigation performed can be found in the attached exhibit file. Many of these cases identified and researched present clear certain matches due to secondary address match confirming that the property listed as the residence of the individual voter was transferred to someone else around the time of death or to the state in the case of the felon. Votes in this risk bucket highlight the issues that exist within the Georgia voter system detecting and preventing invalid and illegal votes and properly tracking registered voters date of birth and date of death. With the deceased and felons recorded as voting, a reasonable person might question if there were large batches of votes that were dumped into the pile which included a few dead people. The dead people voting by themselves won't overturn the election result, but if they are not claimed by an individual voter, they cause a reasonable person to question the integrity of an election. Especially in a state whose voting system does not appear to enforce compliance with election rules and regulations.

50.

Death Matches: There were up to 10,315 votes in this population of matches. This is a list of individuals who appear in the Voter History file as having voted in the November 3, 2020 election whose First Name, Last Name, and Birth Year in the Voter Registration match exactly to the First Name, Last Name, and Birth Year of an individual in the 2020 Deceased Individuals file who is recorded as having perished prior to November 3, 2020. Of these, 8,718 are recorded as having perished prior to the date which the State records accepting their ballots. Calculated fields were created but have been omitted from this description to not overwhelm the testimony. Additional details behind the calculated fields can be provided upon request. The Voter

Registration File was related to the Voter History 11 3 2020 File using the REGISTRATION_NUMBER as the common key between the two tables. The Voter Registration file was related to the Absentee Early Voting file using the REGISTRATION_NUMBER as the common key between the two tables. The Voter Registration File was related to the 2020 Deceased Individuals file using a calculated field in each table that displays the First Name, Last Name, and Year of Birth in each file. The following filters were enabled: [2020 Voter Flag] = 1, [Death Flag] = 1, [Date of Death] < 11/3/2020. In simple language, the filters were used to display only the Registered Voters who appear in the Voter History file and in the Death file and who date of death was at least one calendar day before Election Day. Because the Voter Registration file only contains the Birth Year for each registered voter, a more exact match cannot be made and there may indeed be false positives included in the population. Only the State possesses the full birth date records for its voters and could conduct the full analysis with certainty.

51.

Inmate matches: There were up to 2,560 votes in this population of matches. This is a list of Registered Voters who appear in the Inmate file whose related record whose First Name, Last Name, and Birth Year in the Voter Registration match exactly to the First Name, Last Name, and Birth Year of an individual in the Inmate file. Calculated fields were created but have been omitted from this description to not overwhelm the testimony. Additional details behind the calculated fields can be provided upon request. The Voter Registration File was related to the Voter History 11 3 2020 File using the REGISTRATION_NUMBER as the common key between the two tables. The Voter Registration file was related to the Absentee Early Voting file using the REGISTRATION_NUMBER as the common key between the two tables. The Voter

Registration File was related to the Inmate file using a calculated field in each table that displays the First Name, Last Name, and Year of Birth in each file. The following filters were enabled: [2020 Voter Flag] = 1, [Inmate Flag] = 1, [Count of Name Match – Inmate] = 1. In simple language, the filters were used to display only the Registered Voters who appear in the Voter History file and in the Inmate file. Because the Voter Registration file only contains the Birth Year for each registered voter, a more reliable match technique could not be used and there may be false positives included in the population.

52.

At the present time, I intend to rely on the documents produced set forth above as possible exhibits.

EXHIBIT 1: Voted Absentee Not in Voter File List

EXHIBIT 2: Voted Absentee, Applied Earlier than 180 Days Before the Election List

EXHIBIT 3: Ballots Returned Before They Were Issued List

EXHIBIT 4: Ballots Issued Before Application List

EXHIBIT 5: Early Voter Accepted before October 12, 2020 or after November 3, 2020 List

EXHIBIT 6: Mailed Voter Received before they were Eligible to be Sent Out on September 15, 2020 List

EXHIBIT 7: Mailed Voter Issued Before They Were Eligible to be Sent Out on September 15, 2020 List

EXHIBIT 8: Voters who both registered after the deadline of October 5, 2020 List

EXHIBIT 9: Absentee Votes Accepted with Same Application Date, Issue Date, and Return date List

EXHIBIT 10: Rejected Application Status with Accepted ABEV Status List

EXHIBIT 11: Ballot Application Date before Registration Date List

EXHIBIT 12: Non-matching Records – Voter Registry to Absentee Early Voter Record Name Match List

EXHIBIT 13: Voters Who Were Underage When Registered List

EXHIBIT 14: Additions to the 2020 Voter File (when compared to the 2016 Voter File) with Registration Dates prior to the previous election date List

EXHIBIT 15: Inconsistent birthdates in the Voter Registration File List

EXHIBIT 16: Absentee Votes with Birthdate On or Before 1915 List

EXHIBIT 17: Deceased Individuals Match

EXHIBIT 18: Inmate Match

EXHIBIT 19: Bryan Geels Resume

[Signature on following page.]

This 1st day of December, 2020.

FURTHER AFFIANT SAYETH NOT

Bryan Geels

Bryan Geels

Sworn to and subscribed before me
this 1st day of December, 2020.

Virginia Rochford
Notary Public

My commission expires: 6-14-2023

