

AFFIDAVIT OF GARLAND FAVORITO

I, Garland Favorito, of Roswell Ga., do solemnly declare the following statements to be true and correct based on my 40+ year career as an IT professional and my experience as the co-founder of Voters Organized for Trusted Elections Results in Georgia (VoterGA). I am over the age of 18 years and declare under penalty of perjury the following:

1. I prepared this affidavit to explain serious deficiencies that compromised the Georgia hand count audit and recount processes used for the 2020 Presidential election and inhibited them from detecting election fraud
2. I did not vote for either of the two Presidential candidates who may have interest in this affidavit nor am I a member of either political party of the two candidates.
3. I am a career Information Technology professional with over 40 years of experience including internet systems design, business systems analysis, database administration, application development, systems development methodology, systems integration, systems development life cycles, computer programming, project management, and multi-factor security implementations for financial transactions. My experience includes medium- and large-scale mission-critical applications in banking, financial systems, health care, accounting, manufacturing, inventory, purchasing, retailing, utilities, telecommunications, insurance, software development and services.
4. I have spent roughly 18 years in part-time research, analysis, production of studies and conducting of presentations throughout Georgia regarding the

states current and previous voting systems. In 2006, I co-founded Voters Organized for Trusted Elections Results in Georgia (VoterGA) which continues to be a leading advocate for Election Integrity in the state. VoterGA is a non-partisan, non-profit, all volunteer, dues free organization.

HAND COUNT AUDIT

5. On November 3rd, Georgia conducted its 2020 General Election which included a race for President of the United States.
6. On November 11th, the Secretary of State (SOS) announced the state of Georgia would conduct an audit of the Presidential race. He ordered all counties to perform a full hand count of votes cast.
7. On November 16th, the State Elections Director instructed counties in a memo to certify the Dominion electronic results if all ballots were processed.
8. Upon completion of the full hand count audit on or about November 19th, the SOS certified and published election results on the SOS web site.
9. I served as a monitor for the full hand count audit in Fulton and DeKalb counties prior to state certification.
10. During the Fulton County audit on November 14th, I noticed two Carter Center monitors who were appointed by the SOS office according to county election officials

11. As a monitor, I noticed the counties employed slightly different practices for the audits and recounts within the general guidelines provided by the state and using the equipment owned by the state.
12. During the audit on November 14th and 15th, I noticed that Fulton and DeKalb counties had not done proper due diligence to ensure that each audit table had a counter representing each major candidate or political party
13. During the audit, I noticed monitors were generally not allowed to monitor the data entry point in Fulton and DeKalb counties to determine if audit results were being entered correctly. I also observed a single, unmonitored individual who entered results in Fulton County.
14. During the audit, I noticed that counties entered their data into a central Secretary of State system; they possessed no total results of their own audit, and they relied on the SOS office to tell them what their audit results were.
15. Because the audit reporting procedure adopted by the SOS broke the chain of custody and violated basic principles of bottom up election reporting, VoterGA volunteers engaged in a project to attempt to confirm audit results directly with counties who may have created their own totals for verification.
16. Upon completion of the audit, State Election Director Chris Harvey notified the counties in a November 16th memo to **certify the Dominion electronic results** if all ballots were originally processed and not the results of the actual hand audit.

17. The SOS then allowed counties to reset their systems for upcoming elections thus potentially eliminating capabilities to examine the tabulator logic.
18. The SOS then allowed counties to reset their systems for upcoming elections thus potentially eliminating capabilities to examine the tabulator logic.
19. I am aware that the Carter Center created a report stating that the audit was successful but I do not consider any audit with the distancing, data upload, chain of custody and auditor organization flaws described in this affidavit to be legitimate

RECOUNT

20. On November 25th, after certification of the state election results, Georgia counties began a recount requested by the President.
21. A recount, according to a new State Election Board rule, simply rescans bar codes for in-person votes and reprints their previous unverifiable results. That renders Georgia recounts as meaningless.
22. While serving as a recount monitor in DeKalb County on November 27th, I noticed what seemed to be ballots with the same potentially fraudulent characteristics to those counters noticed in Fulton County.
23. I could not get close enough to confirm whether or not the ballots were valid because a county staffer wanted me to stay at least 6 feet away from the ballot table.

24. The 6' distancing rule imposed by all counties rendered recount and audit monitoring essentially meaningless.
25. The Constitution Party of Georgia supplied dozens of audit and recount monitors in over a dozen counties in part, through my role as Elections Director of the party.
26. During the hand count audit and recount, our Constitution Party of Georgia (CPGA) monitors were consistently denied access to monitor in Cobb and Fulton counties despite the fact that the party had a qualified write-in candidate, Don Blankenship, on the Presidential ticket.
27. County Election Directors blamed the SOS office for the prohibition against CPGA monitors that appears to violate the O.C.G.A. 21-2-495 recount law
28. SOS legal counsel Ryan Germany would not answer personal cell phone calls from our Chairman Ricardo Davis, who attempted to on one occasion to establish a three way call including me to clarify the SOS legal policy
29. SOS Raffensperger would not answer his personal cell phone to clarify their legal policy when I called and texted him.
30. I believe the attempted prohibition of our monitors in Cobb and Fulton counties damaged the quality of the audit and recount as our monitors appeared to be more numerous and better trained than those of other parties
31. During the recount I witnessed a variety of irregularities.
 - A half dozen or more unsecured ballot suitcases.

- Election Day and Advanced In Person ballots accidentally mixed into the same boxes that had to be reopened to separate the ballots.
- A failure to properly backup the election files resulting in a county having to rescan all ballots a second time.

32. I was prepared to offer this testimony and more as the 6th witness of the President's legal team during the December 3rd State Senate hearing but the chairman moved my name to the bottom of the list and closed the hearing without calling me.

33. I have prepared this affidavit in the interest of non-partisan Election Integrity for which I have advocated strongly throughout the last 18 years

34. As I said above, I did not vote for either of the two Presidential candidates mentioned nor am I a member of either political party of the candidates.

DATED this the 9th day of December, 2020

Herland T. Brown
Signature of Affiant

SWORN to subscribed before me, this 9th day December, 2020

[Signature]
NOTARY PUBLIC

My Commission Expires: July-11-2023

