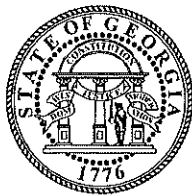


**William Ligon**  
District 3  
158 Scranton Connector  
Brunswick, Georgia 31525  
Office: 912.261.2263  
Email: william@senatorligon.com



**Committees**  
Banking and Financial Institutions, Chairman  
Ethics, Vice Chairman  
Reapportionment and Redistricting,  
Vice Chairman  
Appropriations  
Health and Human Services  
Judiciary

121-H State Capitol  
Atlanta, Georgia 30334  
Phone: 404.463.1383

## Georgia Senate

William.Ligon@senate.ga.gov

30 December, 2020

Chairman Robb Pitts,  
Fulton County Board of Commissioners

Chairwoman Mary Carole Cooney,  
Fulton County Registration and Elections Board

Dear Chairman Pitts and Chairwoman Cooney,

As the Chairman of the Georgia Senate Standing Judiciary Sub-Committee on Election Law I wish to advise you that the Committee just completed its second day of hearings regarding the November 3<sup>rd</sup>, 2020 Election for the State of Georgia. During today's hearing in particular, there was unequivocal proof of duplicate scanning of absentee ballots at the State Farm Arena on the evening of November 3<sup>rd</sup> and the early morning hours of November 4<sup>th</sup>. The Committee heard from an expert, Jovan Hutton Pulitzer (Mr. Pulitzer).

Mr. Pulitzer testified that he can determine with 100% certainty if the entirety of the absentee ballots of Fulton County are authentic or not. The Committee also heard testimony from Robert D. Cheeley, among other attorneys, who have requested access to these absentee ballots. Mr. Cheeley testified that Fulton County Board of Elections had received an open records request for these ballots to be examined and scanned with non-destructive high-speed scanning equipment and that said scanning was arranged with the office of Mr. Ralph Jones to occur on the morning of December 30<sup>th</sup>, 2020 at 9:00am at the English Street warehouse. When Mr. Cheeley's staff, including at least one attorney, arrived with the four high-speed scanners and forensic technicians, the Fulton County Elections staff instructed them to go to the World Congress Center where the ballots could be reviewed and scanned. When Cheeley Law Group and the forensic technicians arrived at the World Congress Center, they were informed that the subject ballots could not be scanned or examined without a court order.

It was disappointing to our Committee members to hear that the legally protected right to access the subject ballots was denied, particularly given the fact that the integrity of Fulton County's count of the subject ballots was called into serious question based upon the video from the State Farm Arena on November 3<sup>rd</sup> and 4<sup>th</sup>, 2020. When one reviews that video, it is patently obvious to even an untrained observer that absentee ballots were being scanned in duplicate many times by the five Fulton County poll workers. These actions would destroy voter confidence and give Fulton County a bad name unless the subject ballots are immediately made available to Cheeley Law Group, Mr. Pulitzer and their forensic experts.

Accordingly, at the conclusion of the hearing today, this Committee voted unanimously to respectfully request that Fulton County immediately, while Mr. Pulitzer and the forensic team are in Atlanta today and tomorrow, cooperate fully and produce the subject ballots and related electronic devices involved in the scanning and tallying of votes. For your convenience, attached hereto as Exhibit 1 is the Open Records Request made by Cheeley Law Group. The Committee would greatly appreciate Fulton County's full cooperation and compliance by noon of December 31<sup>st</sup>, 2020, in order that these ballots can be reviewed and the public, which has a right to this authentication of the ballots, may have this information this week.

Thank you for prompt attention.

Senator William T. Ligon, Jr.  
District 3

Cc:  
Secretary of State Brad Raffensburger  
Director Richard Barron, Fulton Registration and Elections  
Ms. Cheryl Ringer, Esp., Fulton County Attorney

**EXHIBIT 1**

**CHEELEY LAW GROUP, LLC**

Trial Lawyers  
www.cheeleylawgroup.com

2500 Old Milton Parkway, Suite 200  
Alpharetta, Georgia 30009

ROBERT D. CHEELEY  
bob@cheeleylawgroup.com

Phone: 770.814.7001  
Fax: 678.559.0273

December 28, 2020

**VIA ONLINE SUBMISSION**

Fulton County Board of Regulation and Elections  
ATTN: Records Custodian  
141 Pryor Street SW  
Atlanta, GA 30303

Re: *Open Records Request Pursuant to O.C.G.A. § 50-17-70 et seq.*

Dear Records Custodian:

On Wednesday December 30, 2020 at 9:00 a.m., please make available the following documents and things for physical, non-destructive inspection for testing and scanning, in their original form:

- All original, paper absentee mail-in ballots as well as the scanned/electronic copies that were counted towards the 2020 Presidential Election vote totals which were scanned at State Farm Arena located at 1 State Farm Drive, Atlanta, GA 30303 between the dates of November 3, 2020 and November 4, 2020; and
- All original, paper absentee mail-in ballots as well as the scanned/electronic copies for the 2020 Presidential Election that were discarded or otherwise not counted for the 2020 Presidential Election.
- The originals of the spoiled absentee mail-in ballots.

This request is made pursuant to O.C.G.A. § 50-18-71(b)(1)(A). Please contact Vicky Dracos with my office at 770-814-7001 or by email at [vicky@cheeleylawgroup.com](mailto:vicky@cheeleylawgroup.com) to coordinate the location for the inspection. The undersigned will have experts accompanying to analyze the originals and the electronic stored version of these ballots.

Thank you for your immediate attention to this matter.

Sincerely,

/s/ Robert D. Cheeley

Robert D. Cheeley

cc: Vicky Dracos

# CHEELEY LAW GROUP, LLC

Trial Lawyers  
www.cheeleylawgroup.com

2500 Old Milton Parkway, Suite 200  
Alpharetta, Georgia 30009

ROBERT D. CHEELEY  
bob@cheeleylawgroup.com

Phone: 770.814.7001  
Fax: 678.559.0273

December 29, 2020

## VIA ONLINE SUBMISSION

Fulton County Board of Regulation and Elections  
ATTN: Records Custodian  
141 Pryor Street SW  
Atlanta, GA 30303

Re: *Open Records Request Pursuant to O.C.G.A. § 50-17-70 et seq.*

Dear Records Custodian:

In addition to our December 28, 2020 request that certain documents be made available for inspection on December 30, 2020 at 9:00 a.m., please also make the following documents available:

1. The paper ballots cast for all mail-in and absentee ballots which were counted in the November 2020 general election in Fulton County, Georgia.
2. The spoiled paper ballots cast for all spoiled ballots from the November 2020 general election by any voter in Fulton County, Georgia which were spoiled or otherwise unable to be electronically scanned.
3. The paper adjudicated ballots, or ballots cast by election officials for voters whose ballots were spoiled or otherwise unable to be electronically scanned, from the November 2020 general election in Fulton County, Georgia.
4. Fulton County, Georgia shall provide an indoor location with electrical power for the electronic scanning of the paper ballots.
5. From the Dominion electronic election management system or other electronic election management system used by Fulton County, Georgia, the:
  - a) Dominion or other Electronic Cast Vote Record;
  - b) Ballot Images - Raw Images;
  - c) Ballot Images - Ballot Audit and Review;
  - d) Vote-by-Mail Ballot Report;

December 29, 2020

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- e) Provisional Ballot Report;
- f) Conditional Voter Registration Ballot Report;
- g) Cast Vote Record (Raw data) - JSON;
- h) ImageCast Central Logs;
- i) Ballot Scanning/Tabulation Machine Logs;
- j) Ballot Scanning/Tabulation Machine Tape;
- k) Ranked-Choice Voting: Board of Supervisors, Final Detailed Report;
- l) Report of all spoiled ballots; and,
- m) Report of all the adjudicated ballots

These systems generated reports should be provided as (a) an XML file, and (b) a JSON file, and also (c) a TXT file.

6. Available for all available electronic devices used by Fulton County in the November 2020 general election for electronic forensic imaging.

This request is made pursuant to O.C.G.A. § 50-18-71(b)(1)(A). Please contact Vicky Dracos with my office at 770-814-7001 or by email at [vicky@cheeleylawgroup.com](mailto:vicky@cheeleylawgroup.com) to coordinate the location for the inspection. The undersigned will have experts accompanying to analyze the originals and the electronic stored version of these ballots.

Thank you for your immediate attention to this matter.

Sincerely,

/S/ Robert D. Cheeley

Robert D. Cheeley, Esq.

cc: Vicky Dracos