

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RHONDA J. MARTIN, DANA BOWERS,
JASMINE CLARK, SMYTHE DUVAL,
JEANNE DUFORT and THE GEORGIA
COALITION FOR THE PEOPLE’S
AGENDA, INC.,

Plaintiffs,

and

CAROLYN BOURDEAUX FOR
CONGRESS and FAZAL KHAN,

Proposed Plaintiff-Intervenors,

v.

BRIAN KEMP, SECRETARY OF STATE
OF GEORGIA; REBECCA N.
SULLIVAN, RALPH F. “RUSTY”
SIMPSON, DAVID J. WORLEY and
SETH HARP; STEPHEN DAY, JOHN
MANGANO, ALICE O’LENICK, BEN
SATTERFIELD and BEAUTY
BALDWIN,

Defendants.

Civil Action File No.

1:18-cv-04776 LMM

MOTION TO INTERVENE AS PLAINTIFFS

Pursuant to Federal Rule of Civil Procedure 24, Carolyn Bourdeaux for Congress and Fazal Khan (“Proposed Plaintiff-Intervenors”), seek to participate as intervening plaintiffs in the above-captioned lawsuit challenging the

constitutionality of Georgia county election officials' policy of rejecting absentee mail ballots that omit immaterial information not necessary for verifying the voter's identity or determining whether they are eligible to vote.

For the reasons discussed in the memorandum of law in support citing legal authorities, filed concurrently herewith pursuant to Rule 7.1.A of the Local Rules of the Northern District of Georgia, Proposed Plaintiff-Intervenors are entitled to intervene in this case as a matter of right under Federal Rule of Civil Procedure 24(a)(2). In the alternative, the Proposed Plaintiff-Intervenors request permissive intervention pursuant to Rule 24(b). In accordance with Rule 24(c), a proposed complaint in intervention is also attached.

Counsel for Proposed Plaintiffs-Intervenors have conferred with Counsel for the Plaintiffs and the Defendants. The Plaintiffs have indicated that they consent to intervention, and the Defendants had not yet responded at the time of this filing.

WHEREFORE, the Proposed Plaintiff-Intervenors pray that the Court grant them leave to intervene in the above-captioned matter and to file the proposed complaint in intervention that is attached.

Dated: November 11, 2018

Respectfully submitted,

/s/ Veronica Higgs Cope
GA Bar No.: 352145
The Cope Law Firm, P.C.
2330 Scenic Highway
Snellville, GA 30078
Telephone: (404) 917-1077
Facsimile: (866) 614-8295
vcope@copelawfirm.com

Marc E. Elias*
Bruce V. Spiva*
Brian S. Marshall*
Aria C. Branch*
K'Shaani Smith*
PERKINS COIE LLP
700 Thirteenth Street, N.W., Suite 600
Washington, D.C. 20005-3960
Telephone: (202) 654-6200
Facsimile: (202) 654-6211
MElias@perkinscoie.com
BSpiva@perkinscoie.com
BMarshall@perkinscoie.com
ABranch@perkinscoie.com
KShaaniSmith@perkinscoie.com

Counsel for Proposed Plaintiffs-Intervenors

*Seeking *Pro Hac Vice* Admission

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing Motion to Intervene has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

Dated: November 11, 2018

/s/ Veronica Higgs Cope

GA Bar No.: 352145
The Cope Law Firm, P.C.
2330 Scenic Highway
Snellville, GA 30078
Telephone: (404) 917-1077
Facsimile: (866) 614-8295
vcope@copelawfirm.com

*Counsel for Proposed Plaintiff-
Intervenors*

RETRIEVED FROM DEMOCRACYDOCKET.COM

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of November 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to parties in this action.

Dated: November 11, 2018

/s/ Veronica Higgs Cope

GA Bar No.: 352145
The Cope Law Firm, P.C.
2330 Scenic Highway
Snellville, GA 30078
Telephone: (404) 917-1077
Facsimile: (866) 614-8295
vcope@copelawfirm.com

*Counsel for Proposed Plaintiff-
Intervenors*

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RHONDA J. MARTIN, DANA BOWERS,
JASMINE CLARK, SMYTHE DUVAL,
JEANNE DUFORT and THE GEORGIA
COALITION FOR THE PEOPLE’S
AGENDA, INC.,

Plaintiffs,

CAROLYN BOURDEAUX FOR
CONGRESS and FAZAL KHAN,

Proposed Plaintiff-Intervenors,

v.

BRIAN KEMP, SECRETARY OF STATE
OF GEORGIA; REBECCA N.
SULLIVAN, RALPH F. “RUSTY”
SIMPSON, DAVID J. WORLEY and
SETH HARP; STEPHEN DAY, JOHN
MANGANO, ALICE O’LENICK, BEN
SATTERFIELD and BEAUTY
BALDWIN,

Defendants.

Civil Action File No.

1:18-cv-04776 LMM

BRIEF IN SUPPORT OF MOTION TO INTERVENE AS PLAINTIFFS

Pursuant to Federal Rule of Civil Procedure 24, Carolyn Bourdeaux for Congress and Fazal Khan (collectively, “Proposed Plaintiff-Intervenors”) move to

intervene as plaintiffs in the above-titled action. In this action, Plaintiffs Rhonda J. Martin, Dana Bowers, and Jasmine Clark, Smythe Du Val, Jeanne Dufort, the Georgia Coalition for the People's Agenda, Inc., and the American Advancing Justice-Atlanta (collectively, the "Plaintiffs") challenged Georgia's statutory procedures for rejecting absentee ballots due to alleged technical errors, such as missing dates of birth or addresses. Contrary to federal and state law, Gwinnett County election officials are rejecting absentee ballots which were cast by registered Georgia voters about which there is no question as to their identity or qualifications to vote based on immaterial omissions or errors on the absentee ballot oath, such as a missing date of birth or address. Proposed Plaintiff-Intervenors seek an Order requiring that these ballots be counted and that the certification, which is scheduled to occur on this coming Tuesday, November 13, 2018, be delayed until such time as this Court can consider this matter and the ballots be counted should the Court grant the relief the Proposed Plaintiff-Intervenors are seeking. Proposed Plaintiff-Intervenors also seek to require defendants to permit voters who failed to sign the Oath an opportunity to cure their ballots (during the three-day period immediately following this Court's grant of Plaintiff-Intervenors' requested relief). Counsel for the Proposed Plaintiff-Intervenors have consulted counsel for the Plaintiffs and they do not oppose the Proposed Plaintiff-Intervenors' intervention. Counsel for the Proposed Plaintiff-Intervenors have sought defendants' position, but Defendants

have not yet been able to convene their Boards to provide a response, and therefore have no position at this time.

As the principal campaign committee in support of Carolyn Bourdeaux's election to Georgia's 7th Congressional District in the United States House of Representatives, the Carolyn Bourdeaux for Congress ("the Campaign") has a keen interest in the outcome of this litigation. The Campaign's mission is for Carolyn Bourdeaux to be elected to the House, and its mission will be undermined if valid absentee ballots cast by voters who support Carolyn Bourdeaux and her election are illegally and unconstitutionally rejected based on immaterial information that is either missing from or incorrect on the absentee ballot oath. Similarly, Proposed Plaintiff-Intervenor Khan has an interest in the outcome of this litigation. If defendants are permitted to maintain their illegal policy of rejecting absentee ballots for immaterial reasons, then Plaintiff Khan will suffer irreparable harm and serious injury in the form of total disenfranchisement, despite the fact that he was an eligible voter in the November 2018 election.

Proposed Plaintiff-Intervenors' interests are not adequately represented in this litigation, because the arguments put forth and the relief requested by the Plaintiffs diverge from that of Proposed Plaintiff-Intervenors. Specifically, Proposed Plaintiff-Intervenors seek consideration of a federal Civil Rights Act claim that the current Plaintiffs did not allege and Proposed Plaintiff-Intervenors request a more narrowly

defined remedy – (1) that all unlawfully rejected absentee ballots in Gwinnett County be counted, and (2) that voters who cast absentee ballots but did not sign the oath on the ballot envelope be permitted to cure their ballots by appearing at their county elections office and signing the ballot within three days of a Court order, should this Court order the relief requested by Proposed Plaintiff-Intervenors. Proposed Plaintiff-Intervenors seek intervention as of right, or, in the alternative seek permissive intervention. Pursuant to Federal Rule of Civil Procedure 24(c), this Motion is accompanied by a proposed Complaint, which is attached hereto as Exhibit 1, and a proposed order, filed concurrently with this Motion.

ARGUMENT

This litigation will have a direct impact on the Campaign's mission to elect Carolyn Bourdeaux to Congress. It will also have a direct impact on the ability of Proposed Plaintiff-Intervenor Khan's fundamental right to vote in the November 2018 election. Given these interests, which are not adequately protected by any of the current plaintiffs, and the fact that the circumstances surrounding the litigation have changed (the election has been held and the Gwinnett County Board has continued to reject absentee ballots on illegal grounds), the motion to intervene should be granted. As set forth below, Proposed Plaintiff-Intervenors meet the requirements for intervention as a matter of right under the Federal Rule of Civil

Procedure 24(a)(2). Alternatively, this Court could and should allow the Proposed Plaintiff-Intervenors permissive intervention under Rule 24(b).

I. Proposed Plaintiff-Intervenors Are Entitled to Intervene as a Matter of Right Under 24(a)(2).

Proposed Plaintiff-Intervenors easily meet the Eleventh Circuit test for motions to intervene as of right. To qualify, upon timely application, a third party “must show that it has an interest in the subject matter of the suit, that its ability to protect that interest may be impaired by the disposition of the suit, and that existing parties in the suit cannot adequately protect that interest.” *Mt. Hawley Ins. Co. v. Sandy Lake Props, Inc.*, 425 F.3d 1308, 1311 (11th Cir. 2005).

First, there can be no dispute that the motion is timely. Proposed Plaintiff-Intervenors are seeking to intervene as soon as they learned that Gwinnett County, which is within Georgia’s 7th Congressional District, was rejecting absentee ballots in violation of federal law and U.S. Constitution, and that, despite requests that it abide by federal and state law, it would not alter this unlawful practice. The Gwinnett County Board was asked to reconsider its position and count absentee ballots that have missing or incorrect information that is immaterial to the identity of the voter, but it affirmed yesterday afternoon that it would not do so. *See* Letter from Sean Young to Lynn Ledford (Nov. 8, 2018), *available at* https://www.acluga.org/sites/default/files/field_documents/acluga-demand-ltr-absentee-ballot-missing-birthdate.pdf (attached as Exhibit 2) (demanding that

Gwinnett County elections officials count absentee ballots that have been rejected because they contain missing or incorrect birthdate information on the absentee ballot envelope); *see also* Tyler Estep, *Gwinnett Elections Board Meets in Private as Ballot Battles Continue*, Atlanta Journal-Constitution (Nov. 9, 2018), <https://www.ajc.com/news/local-govt--politics/gwinnett-elections-board-meets-private-ballot-battles-continue/7b1Im3tlGNjD3aZtleBTUK/> (noting that the Gwinnett County Board's position with respect to rejecting absentee ballots would not change). *Compare Salvors, Inc. v. Unidentified Wrecked & Abandoned Vessel*, 861 F.3d 1278, 1294 (11th Cir. 2017) (finding motion to intervene timely, though filed the 33 years after the district court's order, because intervenor did not know of its interest until shortly before filing its motion). Further, the Proposed Plaintiff-Intervenors are seeking to intervene after the ballots have been cast, but before the election results have been certified and before even the deadline for curing provisional ballots has lapsed (November 13, 2018). *See Martin v. Kemp*, Dkt. No. 23. Accordingly, no party can legitimately claim that intervention by Proposed Plaintiff-Intervenors at this stage would cause them any prejudicial delay. Nor have Proposed Plaintiff-Intervenors delayed in moving for intervention. Indeed, the Gwinnett Board announced its decision to reject the request that it count the ballots at issue only two days ago, on Friday, November 9. Estep, *supra*.

Second, the Proposed Plaintiff-Intervenors' interests directly relate to the subject matter of this action. This inquiry is a "flexible one." *See Chiles v. Thornburgh*, 865 F.2d 1197, 1215 (11th Cir. 1989); *Security Ins. Co. v. Schipporeit, Inc.*, 69 F.3d 1377, 1381 (7th Cir. 1995) ("[w]hether an applicant has an interest sufficient to warrant intervention as a matter of right is a highly fact-specific determination, making comparison to other cases of limited value"). Indeed, "[t]he 'interest' test is primarily a practical guide to disposing of lawsuits by involving as many apparently concerned persons as is compatible with efficiency and due process." *Worlds v. Dep't of Health & Rehab. Servs.*, 929 F.2d 591, 594 (11th Cir. 1991). Proposed Plaintiff-Intervenor Khan has a clear interest in the outcome of this litigation. If defendants are permitted to maintain their illegal policy of rejecting absentee ballots for immaterial reasons, then Plaintiff Khan will suffer irreparable harm and serious injury in the form of total disenfranchisement, despite the fact that he was an eligible voter in the November 2018 election. In addition, the Campaign has an interest in ensuring that its supporters' legally cast ballots are counted as required by federal and state law. Georgia elections are governed by Georgia's election laws, as well as the U.S. Constitution. As the principal campaign committee for a candidate in the 2018 Election for Representative of Georgia's 7th Congressional district, the Campaign has an interest in ensuring that all votes are counted. In fact, as of the date of this filing, out of the 17,809 absentee ballots

counted in the 7th Congressional District, 10,208 were for the Candidate (about 57 percent).¹ More specifically, in Gwinnett County, of the 14,298 absentee ballots counted, 8,551 (nearly 60 percent) were for the Candidate.² The Campaign certainly has a legally cognizable and indeed compelling interest in this litigation because the rejected ballots are more likely than not to be from voters in support of her candidacy. *See Tex. Democratic Party v. Benkiser*, 459 F.3d 582, 587-88 (5th Cir. 2006) (recognizing that “harm to [] election prospects” was “a concrete and particularized injury”); *Winston v. United States*, No. 14-cv-05417-MEJ, 2015 WL 9474284, *2 (N.D. Cal. Dec. 29, 2015) (recognizing a “concrete” “economic interest” that is “related to the underlying subject matter of the litigation” triggers the right to intervene) (citation omitted).

Third, Proposed Plaintiff-Intervenors will be impaired by the outcome of this case. Impairment is a “diminution, however small, in strength, value, quality, or quantity.” 6 Moore’s Fed. Practice, § 24.03(3)(a). Rule 24(a) does not require legal impairment of a movant’s interests. It is enough that a movant’s ability to protect its interests may be impaired as a practical matter. In addition, the rule’s emphasis on “practical disadvantage” was “designed to liberalize the right to intervene in federal

¹ Sec’y of State, Nov. 6, 2018 Election Day Results, *available at* <https://results.enr.clarityelections.com/GA/91639/Web02-state.220747/#/cid/30700>.

² *Id.*, *available at* <https://results.enr.clarityelections.com/GA/Gwinnett/91707/Web02.216033/#/cid/115>

actions.” *Nuesse v. Camp*, 385 F.2d 694, 701 (D.C. Cir. 1967). As discussed, the Proposed Plaintiff-Intervenors have a significant, protectable interest, and absent intervention, the Court’s findings will place them at a practical disadvantage in protecting those interests. Moreover, absent intervention, Proposed Plaintiff-Intervenors would have no way to appeal the Court’s ruling denying the Plaintiff’s Motion for Preliminary Injunction regarding absentee ballots where the signatures match but are missing other immaterial information. *Martin v. Kemp*, Dkt. No. 41. Proposed Plaintiff-Intervenors would have no ability to vindicate their rights in a separate proceeding, following resolution of this action, because the principle of *stare decisis* may apply. Moreover, Proposed Plaintiff-Intervenors have a need for immediate relief to require Gwinnett County to count these votes before the election is certified.

Fourth, the Proposed Plaintiff-Intervenors’ interests are not adequately protected by existing parties in this litigation. The “requirement of the Rule is satisfied if the applicant shows that representation of his interest ‘may be’ inadequate; and the burden of making that showing should be treated as minimal.” *Trbovich v. United Mine Workers*, 404 U.S. 528, 538 n.10 (1972)). “Any doubt concerning the propriety of allowing intervention should be resolved in favor of the proposed intervenors because it allows the court to resolve all related disputes in a single action.” *Fed. Savings & Loan Ins. Co. v. Falls Chase Special Taxing Dist.*,

983 F.2d 211, 216 (11th Cir. 1993). First, Proposed Plaintiff-Intervenors seek relief from this Court on an expedited timeline. Second, the Plaintiffs do not adequately represent the Proposed Plaintiff-Intervenors' interests because they do not request the same relief as Proposed Plaintiff-Intervenors. For example, the Plaintiffs have requested that the Court enter an order requiring a "one-stop cure," which would require the county election officials to create a new procedure for curing absentee ballots missing information such as date of birth and address. *Martin v. Kemp*, Dkt. No. 41.

By contrast, Proposed Plaintiff-Intervenors maintain that the missing information is immaterial and need not be cured for the election officials to count the votes. Georgia law makes clear that this information is not necessary to verify the identity of the voter and cannot be used to automatically deny a voter's fundamental rights. *Jones v. Jessup*, 279 Ga. 531, 533 n.5 (2005). Furthermore, the Civil Rights Act, 52 U.S.C. § 10101(a)(2)(B), prohibits government officials from rejecting ballots that includes errors or omissions of information immaterial to determining whether the individual is eligible to vote. Proposed Plaintiff-Intervenors assert that because voters prove age eligibility when they register, O.C.G.A. § 21-2-381 (b) (registrar sends absentee ballot once voter's eligibility is confirmed), not when they mail their absentee ballot, any information on the absentee ballot envelope, other than perhaps their signature, is immaterial to determining whether

the voter is qualified. Thus, the county election officials may not reject ballots because of those errors or omissions.

II. In the Alternative, Proposed Plaintiff-Intervenors Are Entitled to Permissible Intervention.

If the Court does not grant the Proposed Plaintiff-Intervenors' motion to intervene as a matter of right, they respectfully request that the Court exercise its discretion to allow them to intervene under Rule 24(b). The Court has broad discretion to grant a motion for permissive intervention when the Court determines that (1) the intervenor's claim or defense and the main action have a question of law or fact in common, and that (2) the intervention will not unduly delay or prejudice the adjudication of the original parties' rights. *See* Fed. R. Civ. P. 24(b)(1)(B); *Georgia v. U.S. Army Corps of Eng'rs*, 302 F.3d 1242, 1250 (11th Cir. 2002) ("Permissive intervention under Fed. R. Civ. Proc. 24(b) is appropriate where a party's claim or defense and the main action have a question of law or fact in common and the intervention will not unduly prejudice or delay the adjudication of the rights of the original parties.").

The Plaintiff-Intervenors meet the requirements for permissive intervention. First, the Plaintiff-Intervenors' proposed complaint has questions of law and in common with the First Amended Complaint: both challenge the legality and constitutionality of the Gwinnett County's practice of rejecting absentee ballots, particularly those with immaterial omissions and errors, such as a date of birth or

address; and both raise claims under the Fourteenth Amendment. Second, for the reasons set forth above, the motion is timely and given the stage of the litigation and the changed circumstances underlying this litigation – i.e., the election has already taken place, but the results have yet to be certified – intervention will not unduly delay or prejudice the adjudication of the rights of the original parties. Indeed, the Plaintiff-Intervenors are able to proceed without impacting the Court’s previously issued orders.

Finally, the Plaintiff-Intervenors’ intervention will serve to contribute to an additional legal argument and alternative remedy than that proposed by the Plaintiffs. The Plaintiff-Intervenors seek an Order (1) requiring Gwinnett County to count the ballots for voters who have timely submitted their absentee ballots but whose ballots are missing information that is immaterial to verifying their identity, and (2) to provide a cure to those voters who have submitted absentee ballots but failed to sign the Oath. Accordingly, the Plaintiff-Intervenors’ intervention will contribute to the full and just adjudication of the legal questions presented.

CONCLUSION

For the reasons stated above, the Proposed Plaintiff-Intervenors respectfully request that the Court grant their motion to intervene as a matter of right under Rule 24(a)(2) or, in the alternative, permit them to intervene under Rule 24(b). If granted permission to intervene under either provision, Proposed Plaintiff-Intervenors have

attached a proposed complaint in intervention for filing accordance with the Federal and Local Rules of Civil Procedure.

Dated: November 11, 2018

Respectfully submitted,

/s/ Veronica Higgs Cope
GA Bar No.: 352145
The Cope Law Firm, P.C.
2330 Scenic Highway
Snellville, GA 30078
Telephone: (494) 917-1077
Facsimile: (866) 614-8295
vcope@copelawfirm.com

Marc E. Elias*
Bruce V. Spiva*
Brian Marshall*
Aria C. Branch*
K'Shaani Smith*

PERKINS COIE LLP

700 Thirteenth Street, N.W., Suite 600
Washington, D.C. 20005-3960
Telephone: (202) 654-6200
Facsimile: (202) 654-6211
MElias@perkinscoie.com
BSpiva@perkinscoie.com
BMarshall@perkinscoie.com
ABranch@perkinscoie.com
KShaaniSmith@perkinscoie.com

Counsel for Plaintiff-Intervenors

*Seeking *Pro Hac Vice* Admission

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing Memorandum of Law in Support of the Motion to Intervene has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

Dated: November 11, 2018

/s/ Veronica Higgs Cope
GA Bar No.: 352145
The Cope Law Firm, P.C.
2330 Scenic Highway
Snellville, GA 30078
Telephone: (494) 917-1077
Facsimile: (866) 614-8295
vcope@copelawfirm.com

Counsel for Plaintiff-Intervenors

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of November 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to parties in this action.

Dated: November 11, 2018

/s/ Veronica Higgs Cope
GA Bar No.: 352145
The Cope Law Firm, P.C.
2330 Scenic Highway
Snellville, GA 30078
Telephone: (404) 917-1077
Facsimile: (866) 614-8295
vcope@copelawfirm.com

Counsel for Plaintiff-Intervenors

EXHIBIT 1

RETRIEVED FROM DEMOCRACYDOCKET.COM

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RHONDA J. MARTIN, DANA BOWERS,
JASMINE CLARK, SMYTHE DUVAL,
JEANNE DUFORT, and THE GEORGIA
COALITION FOR THE PEOPLE'S
AGENDA, INC.,

Plaintiffs,

and

CAROLYN BOURDEAUX FOR
CONGRESS and FAZAL KHAN,

Plaintiff-Intervenors,

v.

BRIAN KEMP, SECRETARY OF STATE
OF GEORGIA; REBECCA N.
SULLIVAN, RALPH F. "RUSTY"
SIMPSON, DAVID J. WORLEY, and
SETH HARP; STEPHEN DAY, JOHN
MANGANO, ALICE O'LENICK, BEN
SATTERFIELD, and BEAUTY
BALDWIN,

Defendants.

Civil Action File No.

1:18-cv-04776 LMM

**[PROPOSED] PLAINTIFF-INTERVENORS CAROLYN BOURDEAUX
FOR CONGRESS AND FAZAL KHAN'S EMERGENCY COMPLAINT
FOR INJUNCTIVE AND DECLARATORY RELIEF**

Proposed Plaintiff-Intervenors CAROLYN BOURDEAUX FOR CONGRESS and FAZAL KHAN, by and through the undersigned attorneys, file this EMERGENCY COMPLAINT FOR INJUNCTIVE AND DECLARATORY RELIEF against Defendants, ROBYN CRITTENDEN, in her official capacity as Secretary Of State of Georgia; REBECCA N. SULLIVAN, RALPH F. “RUSTY” SIMPSON, DAVID J. WORLEY and SETH HARP, as Members of the Georgia State Election Board; STEPHEN DAY, JOHN MANGANO, ALICE O’LENICK, BEN SATTERFIELD and BEAUTY BALDWIN, as members of the Gwinnett County Board of Registration and Elections, and allege upon information and belief as follows:

1. Georgia permits any eligible elector to vote by mail (“absentee mail voters” or “mail voters”). Nevertheless, in the November 6, 2018 General Election, hundreds of duly eligible voters in Gwinnett County have not been able to take advantage of this method of voting because the Gwinnett County Board of Registration and Elections (“the Gwinnett Board”) has rejected their ballots for immaterial reasons, and even where it is clear that the voter is registered and eligible to vote. Indeed, the Gwinnett Board’s interpretation of Georgia’s Election Code creates an unusually high risk that voters who voted by mail ballot will have their votes rejected for even the smallest error or omission on their

absentee ballot resulting in disenfranchisement, with no meaningful opportunity to cure any perceived deficiency.

2. In Gwinnett County, absentee mail ballots are frequently rejected because of unintentional voter errors like an inaccurate year of birth or address. The consequence of making such an understandable human error has been the rejection of the ballot even where the reviewing official has determined that the signature on the oath matches the signature on the voter's registration card, *and thus, there is absolutely no question as to the voter's qualifications*. Moreover, the voter's qualification to vote under state law is determined *before* the voter is sent an absentee ballot. Therefore, even where the voter neglects to sign the oath on the ballot, she should be given the opportunity to cure this technical error.

3. Further, as this Court has noted, Gwinnett County has a history of rejecting an alarmingly high percentage of absentee ballots. *Martin v. Kemp*, No. 18-4776, Dkt. No. 23 at 7. In the 2016 general election, Gwinnett County rejected 1,196 out of the 20,120 absentee ballots cast (6 percent). Through October 12, 2018, Gwinnett County had rejected 9.6% of the 4,063 absentee mail ballots received, nearly one-third for a missing or mistaken birth year. *Id.* And as of November 11, data from the Secretary of State showed that Gwinnett County had rejected 901 absentee mail ballots for missing information such as a

date of birth, address, or signature. *See* Exs. A, B. By contrast, in neighboring Forsyth County, election officials only rejected 23 absentee ballots, and according to information on the Secretary of State's website, none of these were rejected for omission of or errors in immaterial information such as date of birth or address. *See* Ex. C.

4. The Gwinnett County oath also provides blank spaces for a voter's year of birth and address. *See* Ex. D. The envelope does not indicate that providing these details is mandatory. Because this information is provided on the outer envelope, it is visible when the envelope is returned by mail. By statute, an absentee ballot *may* be rejected "[i]f the elector has failed to sign the oath, or if the signature does not appear to be valid, or if the elector has failed to furnish required information or information so furnished does not conform with that on file in the registrar's or clerk's office, or if the elector is otherwise disqualified to vote." O.C.G.A. § 21-2-3986(a)(1)(C).

5. Federal law, however, prohibits states from using requests for immaterial information—information that is not relevant to whether the voter is qualified under state law to vote—as a barrier to voting. Under the Civil Rights Act, 52 U.S.C. § 10101(a)(2)(B), a government official may not

deny the right of any individual to vote in any election because of an error or omission on any record or paper relating to any

application, registration, or other act requisite to voting, if such error or omission is not material in determining whether such individual is qualified under State law to vote in such election.

6. Understanding this, on the recommendation of the Attorney General, the State Election Board has cited the Civil Rights Act when declining to reprimand at least two counties for their practice of accepting absentee ballots for omitting immaterial information:

Where the election official can verify the identity of the voter by comparing their signature on the absentee ballot envelope with the voter's signature on file, the omission of the additional information of residence address and/or day and month of birth would not be material to that voter's qualifications and the absentee ballot should be counted.

In the Matter of: Burke Cty. Bd. of Election & Registration, Barbara N. Hammett, and Laverne Sello, SEB Case No. 2011-000095 (Feb. 11, 2016) at 3, attached as Worley Decl. Ex. B (concluding accepting absentee ballots that were “missing a street address” did not violate Georgia law); *In the matter of: Eleanor Gale, Elections Supervisor, and McIntosh Cty. Bd. of Elections & Registration*, SEB Case No. 2012-131 (Feb 1, 2016) at 11, attached as Worley Decl. Ex. A (concluding accepting absentee ballots that were missing a date of birth, address, or listed a P.O. Box number as a residential address did not violate Georgia law).

7. While a failure to furnish required information may support rejection of an absentee ballot under O.C.G.A. § 21-2-386(a)(1)(C), the Georgia

Supreme Court has held that nothing in the statute mandates the “automatic rejection of any absentee ballot lacking the elector’s place and/or date of birth.” *Jones v. Jessup*, 279 Ga. 531, 533 n.5 (2005). In *Jones*, the omitted information was the place, day, and month of birth. “However, nothing in O.C.G.A. § 21-2-386 makes an address more or less required than a day and month of birth, both are used to assist the local election official in confirming the identity of the voter where comparison of the voter’s signature insufficient.” Worley Decl. Ex. B; Worley Decl. Ex. A at 5; *see also In the Matter of Fred Haymans et al.*, SEB Case No. 2012-31 (May 22, 2018), attached as Worley Decl. Ex. C (dismissing charge for violating O.C.G.A. § 21-2-386(a)(1)(C) brought against election officials who accepted absentee ballots that without all of the requested information in the oath). In fact, the Defendant Secretary of State has already conceded that “where the year of birth is not necessary to confirm the identity of a voter, it is not otherwise required by O.C.G.A. § 21-2-386(a)(1)(C).” *Martin*, No. 18-4776 Dkt. No. 36 at 3–4.

8. Gwinnett County’s interpretation of O.C.G.A. § 21-2-3986(a)(1)(C) is unusually strict, is unlawful, and should be enjoined by this Court.

9. Plaintiff-Intervenors bring this Emergency Complaint for Declaratory and Injunctive Relief, and their Emergency Motion for Preliminary Injunction and

Show of Good Cause filed herewith, to require Gwinnett County Defendants to count the votes that were improperly rejected in the November 6, 2018 General Election in violation of the Civil Rights Act and the First and Fourteenth Amendments, pursuant to 42 U.S.C. §§ 1983 and 1988, and to prevent Defendants from certifying the 2018 General Election results, currently required by 5 p.m. on Tuesday, November 13, 2018, until all votes have been counted.

10. Plaintiff-Intervenors ask the Court to issue an Order requiring Defendants to consider valid and count each of the 901 absentee ballots that Gwinnett County election officials have rejected due to missing immaterial information.

11. Absent emergency relief, these 901 Georgia voters, whose ballots were improperly rejected, will be disenfranchised, not on the basis of his or her eligibility to vote, but rather, on the basis of Defendants' unlawful interpretation of O.C.G.A. § 21-2-386(a)(1)(C), in clear violation of the Civil Rights Act and the First and Fourteenth Amendments.

JURISDICTION AND VENUE

12. Plaintiff-Intervenors bring this action under 42 U.S.C. §§ 1983 and 1988 to redress the deprivation under color of state law of rights secured by the United States Constitution.

13. This Court has original jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1343 because the matters in controversy arise under the Constitution and laws of the United States.

14. This Court has personal jurisdiction over Defendants, who are sued in their official capacity only.

15. Venue is proper in this Court under 28 U.S.C. § 1391(b) because a substantial part of the events that gave rise to Plaintiff-Intervenors' claims occurred in this judicial district.

16. This Court has the authority to enter a declaratory judgment and to provide preliminary and permanent injunctive relief pursuant to Rules 57 and 65 of the Federal Rules of Civil Procedure and 28 U.S.C. §§ 2201 and 2202.

PARTIES

17. Plaintiff-Intervenor CAROLYN BOURDEAUX FOR CONGRESS (the "Campaign") is the principal campaign committee for Carolyn Bourdeaux's election to represent Georgia's Seventh Congressional District in the United States House of Representatives. The Campaign's mission is for Bourdeaux to be elected to the House, and its mission will be undermined and harmed if valid absentee ballots cast by voters who support Bourdeaux's candidacy are unlawfully rejected based on Defendants' illegal conduct. Moreover, the Campaign's supporters and constituents

are among the 901 voters impacted by the improper rejection of their absentee ballots by Defendants. As of the time of this filing, in unofficial returns, Bourdeaux trails Rob Woodall by 901 votes (139,837 to 138,936), or 0.32% of the 278,773 votes counted.

18. Plaintiff FAZAL KHAN is a registered elector of the State of Georgia and a resident of Gwinnett County. Khan is a Democrat. Khan is eligible to vote and he cast an absentee ballot by mail in the November 6, 2018 election. His absentee ballot was rejected solely because the year of birth information listed on his absentee ballot envelope allegedly did not match the year of birth listed in his voter registration record. This error is immaterial as to election officials' ability to verify Khan's identity and eligibility to vote. Khan seeks to have his absentee ballot counted in the November 2018 election.

19. Defendant ROBYN CRITTENDEN is sued for prospective declaratory and injunctive relief in her official capacity as the Secretary of State of Georgia. Brian Kemp recently resigned as Secretary of State on November 8, 2018. Robyn Crittenden was appointed on the same date and was automatically substituted for him as a Defendant in this case by operation of Fed. R. Civ. P. 25(d). Defendant CRITTENDEN is hereinafter referred to, together with her predecessors, as

“Crittenden” or the “Secretary.”¹

20. The Secretary of State is a state official subject to suit in her official capacity because her office “imbues [her] with the responsibility to enforce the law or laws at issue in the suit,” *Grizzle v. Kemp*, 634 F.3d 1314, 1319 (11th Cir. 2011), specifically the election laws in the State of Georgia. Secretary serves as the Chair of the State Election Board.

21. Defendants REBECCA N. SULLIVAN, RALPH F. “RUSTY” SIMPSON, DAVID J. WORLEY and SETH HARP are members of the State Election Board in Georgia, responsible for obtaining uniformity in election practices by promulgating rules and regulations to ensure the legality and purity of all elections, investigating frauds and irregularities in elections, and reporting election law violations to the Attorney General or appropriate district attorney. The State Board Members are authorized to take such other actions consistent with law to provide for the conduct of fair, legal, and orderly elections. Together with any successors in office automatically substituted for any of them as Defendants by operation of Fed. R. Civ. P. 25(d), these Defendants are hereinafter collectively referred to as the “State Election Board” or “State Election Board Members.” The

¹ Brian Kemp is listed in the case caption of Plaintiff-Intervenors’ Complaint and accompanying papers because it appears that the case caption has not yet been officially updated by the Court.

State Board Members are sued for declaratory and injunctive relief in their official capacities.

22. The Secretary of State and the State Election Board have the authority to direct officials in each county responsible for elections (that is, the county elections board or the superintendent of elections) (collectively “the County Election Officials”).

23. Defendants STEPHEN DAY, JOHN MANGANO, ALICE O’LENICK, BEN SATTERFIELD and BEAUTY BALDWIN are sued for declaratory and injunctive relief in their official capacities as members of the Gwinnett Board. Together with any successors in office automatically substituted for any of them as Defendants by operation of Fed. R. Civ. P. 25(d), these Defendants are hereinafter collectively referred to as the “Gwinnett Board Members” or “Gwinnett Board.”

24. The Gwinnett Board has the authority to exercise the powers and duties of a county election superintendent with respect to conducting elections in Gwinnett County, *see* O.C.G.A. § 21-2-70 to -77. The Gwinnett board is required “[t]o make and issue such rules, regulations, and instructions, consistent with law, including the rules and regulations promulgated by the State Election Board, as he or she may deem necessary for the guidance of poll officers, custodians, and electors in

primaries and elections,” O.C.G.A. § 21-2-70(7), and “[t]o conduct all elections . . . and to perform such other duties as may be prescribed by law,” *id.* at § 21-2-70(13).

FACTS

25. Georgia law sets forth the process for determining eligibility for, distributing, collecting, processing, and counting absentee ballots.

26. Georgia law authorizes any eligible voter to cast his or her absentee ballot by mail. When an absentee voter receives an official absentee ballot, they receive two envelopes. O.C.G.A. § 21-2-384(b).

27. The voter must place the completed absentee ballot in the smaller of the two envelopes. *Id.*

28. The smaller envelope must then be placed in the larger envelope, which contains the oath of the elector and a line for the elector’s signature. O.C.G.A. § 21-2-384(b)-(c).

29. The form of the oath is specified by O.C.G.A. § 21-2-384(c)(1): The oaths referred to in subsection (b) of this Code section shall be in substantially the following form:

I, the undersigned, do swear (or affirm) that I am a citizen of the United States and of the State of Georgia; that my residence address, for voting purposes, is _____ County, Georgia; that I possess the qualifications of an elector required by the laws of the State of Georgia; that I am entitled to vote in the precinct containing my residence in the primary or election in which this ballot is to be cast; that I am eligible to vote by

absentee ballot; that I have not marked or mailed any other absentee ballot, nor will I mark or mail another absentee ballot for voting in such primary or election; nor shall I vote therein in person; and that I have read and understand the instructions accompanying this ballot; and that I have carefully complied with such instructions in completing this ballot. I understand that the offer or acceptance of money or any other object of value to vote for any particular candidate, list of candidates, issue, or list of issues included in this election constitutes an act of voter fraud and is a felony under Georgia law.

Elector's Residence Address

Year of Elector's Birth

Signature or Mark of Elector

In Gwinnett County, the oath appears on the outside of the absentee ballot envelope printed in small type in English and Spanish as shown in Exhibit D.

30. All absentee ballots must be received by 7 p.m. on Election Day to be counted. O.C.G.A. § 21-2-386(a)(1)(F).

31. Pursuant to O.C.G.A. § 21-2-386(a)(1)(C), an absentee ballot *may* be rejected “[i]f the elector has failed to sign the oath, or if the signature does not appear to be valid, or if the elector has failed to furnish required information or information so furnished does not conform with that on file in the registrar’s or clerk’s office, or if the elector is otherwise found disqualified to vote.”

32. If an elector’s ballot is rejected, the clerk “shall write across the face of the envelope ‘Rejected,’ giving the reason therefor. . . . [and] shall promptly notify

the elector of such rejection.” *Id.*

33. As the Court stated in its October 24, 2018 Order, county election officials reported an increase in the volume of absentee by-mail voting and absentee in-person (early) voting for the November 6, 2018 general election. *Martin*, No. 18-4776, Dkt. No. 23.

34. Specifically, Gwinnett County reported that it has received “significantly” more absentee ballot applications for the November 6, 2018 election than in previous years. *Id.*

35. Gwinnett County also has a significantly higher rate of rejecting absentee voters than any other county in the state. *Id.*

36. The Court noted that as of October 18, 2018, Gwinnett County had rejected 524 absentee ballots for signature mismatch, unsigned oaths, and other missing information in the 2018 General Election. *Id.*

37. On October 24, 2018, the Court issued a preliminary injunction prohibiting all county election officials from rejecting any absentee ballot due to an alleged signature mismatch and requiring that the ballots be marked as provisional rather than rejected, allowing the voter to cure the discrepancy. *Id.*

38. For absentee ballots that had been rejected for reasons unrelated to signature mismatches, Plaintiffs sought an order prohibiting Defendants from

rejecting an absentee ballot solely based on a discrepancy or omission relating to year of birth and requested that the Court to permit an absentee voter whose ballot is rejected to provide elections officials with a cure affidavit up until the close of business on the Friday after election day. *See Martin*, Dkt. No. 39 at 3–4.

39. On November 2, 2018, the Court denied Plaintiffs’ request, noting that “Plaintiffs propose[d] no specific instructions for county elections officials to issue, nor do Plaintiffs suggest a procedure for receiving and processing such affidavits across the entire state. . . . Accordingly, if the Court were to grant Plaintiffs’ injunction, the Court would leave county elections officials without any guidance as to what to do if various parts of the oath are left blank, unsigned, if the address matches publicly available information but not other information in the voter’s file, or how to otherwise verify a voter’s identification.” *Id.* Dkt. No. 41 at 8.

40. The Court also noted that at the time of its Order, with “the November 6, 2018 election is rapidly approaching,” implementing Plaintiffs’ proposed cure process would “both burden elections officials and increase the risk of voter confusion.” *Id.* at 10.

41. On Election Day and thereafter, Gwinnett County rejected at least 901 absentee mail ballots for reasons other than signature mismatch, such as omitted or erroneous addresses, or omitted or erroneous years of birth, or missing signatures,

or some combination thereof.

42. Georgia law makes clear that this information is not necessary to establish the eligibility of the voter and cannot be used to automatically deny a voter's fundamental rights. *Jones*, 279 Ga. at 533 n.5. Under Georgia law, voters prove their qualifications to vote when they register to vote and those qualifications are verified *before* they are issued an absentee ballot, O.C.G.A. § 21-2-381(b) (registrar sends absentee ballot once voter's eligibility is confirmed), not when they return their absentee ballot, therefore, any information on the absentee ballot envelope is immaterial to determining whether the voter is qualified. Moreover, for the absentee ballots on which the voter has signed the oath, there is absolutely no dispute concerning the voter's identity or qualifications. Per this Court's October 24 Order, any signatures that election officials have deemed to be not matching would have already been segregated with the provisional ballots, so the signatures on the remaining signed absentee ballots have by definition been determined to match the signatures on the voters' registration cards.

43. The Civil Rights Act, 52 U.S.C. § 10101(a)(2)(B), prohibits government officials from rejecting ballots that includes errors or omissions of information immaterial to determining whether the individual is eligible to vote.

44. This materiality provision "was intended to address the practice of

requiring unnecessary information for voter registration with the intent that such requirements would increase the number of errors or omissions on the application forms, thus providing an excuse to disqualify potential voters.” *Schwier v. Cox*, 340 F.3d 1284, 1294 (11th Cir. 2003).

45. Thus, the county election officials may not reject ballots because of such errors or omissions.

46. Permitting Defendants to reject and discard over nine hundred absentee ballots for missing immaterial information, thereby disenfranchising what is almost certain to be a majority of eligible voters whose ballots should have been counted, would violate the eligible voters’ rights under the Civil Rights Act and First and Fourteenth Amendments.

47. The Gwinnett County Elections Office should not certify the election results until all absentee ballots that had been previously rejected due to immaterial errors and omissions are counted, and, if the voter’s signature is held to be material, voters who omitted a signature should receive notice and a reasonable opportunity to cure the defect before their otherwise eligible vote is rejected.

COUNT I
Section 1971 of the Civil Rights Act of 1964
52 U.S.C. § 10101(a)(2)(B)

48. Plaintiff-Intervenors reallege and incorporate by reference the

allegations of Paragraphs 1 through 47 above as though fully set forth herein.

49. Section 1971 of the Civil Rights Act of 1964, 52 U.S.C. § 10101(a)(2)(B), provides that:

No person acting under color of law shall ... deny the right of any individual to vote in any election because of an error or omission on any record or paper relating to any application, registration, or other act requisite to voting, if such error or omission is not material in determining whether such individual is qualified under State law to vote in such election.

50. The Eleventh Circuit has expressly held “that the provisions of section 1971 of the Voting Rights Act may be enforced by a private right of action under § 1983.” *Schwier*, 340 F.3d at 1297.

51. As a result of the additional and superfluous requirements for casting effective absentee ballots contained in O.C.G.A. § 21-2-386(a)(1)(C), which permits elections officials to reject absentee ballots for nominal technical deficiencies in filling out the information on the back of the envelope, the right to vote of hundreds of Georgia voters in Gwinnett County have been and will continue to be denied as a result of immaterial errors on their absentee ballot identification envelopes, even where election officials can determine that the voter is eligible and registered to vote, unless these provisions are enjoined.

52. Based on the foregoing, Defendants, acting under color of state law, have deprived and will continue to deprive Plaintiff-Intervenors and other Georgia

citizens of rights secured to them by Section 1971 of the Civil Rights Act of 1964, 52 U.S.C. § 10101(a)(2)(B).

COUNT II

First Amendment, Equal Protection, and 42 U.S.C. § 1983

(*Anderson-Burdick*)

U.S. Const. amends. I, XIV

***Threatened Infringement of the Fourteenth Amendment's
Guarantee of Equal Protection***

53. Plaintiff-Intervenors incorporate by reference and reallege paragraphs 1 to 53 of this Complaint as if set forth fully herein.

54. Under the First Amendment and the Equal Protection Clause of the Fourteenth Amendment, a court considering a challenge to a state election law must carefully balance the character and magnitude of the injury to First and Fourteenth Amendment rights that the plaintiff seeks to vindicate against the justifications put forward by the State for the burdens imposed by the rule. *See Burdick v. Takushi*, 504 U.S. 428, 434 (1992); *Anderson v. Celebrezze*, 460 U.S. 780, 789 (1983). “However slight th[e] burden may appear, . . . it must be justified by relevant and legitimate state interests sufficiently weighty to justify the limitation.” *Crawford v. Marion Cty. Election Bd.*, 553 U.S. 181, 191 (2008) (Stevens, J., controlling opinion) (internal quotation marks omitted). Further, all laws that distinguish between groups must at least be rationally related to a legitimate state interest in order to survive

scrutiny under the Equal Protection Clause. *Nordlinger v. Hahn*, 505 U.S. 1, 11 (1992).

55. Nearly a thousand Gwinnett County voters have had, and will have, without action from this Court, their right to vote wholly denied in the 2018 General Election due to the Gwinnett Board's highly restrictive practice of rejecting absentee ballots of duly qualified voters for the omission of immaterial information that Georgia law does not even require for their vote to be counted, and its failure to allow them to cure a missing signature.

56. The Gwinnett Board's practice of rejecting absentee ballots for the reasons discussed herein are not supported by any material or important government interest (indeed, even Georgia law does not require rejection). Moreover, any benefits are plainly outweighed by the severe burden on voters—complete disenfranchisement.

57. Based on the foregoing, Defendants acting under color of law have deprived and will continue to deprive Gwinnett County voters, including many voters who voted for and supported Plaintiff-Intervenors, the rights secured to them by the First and Fourteenth Amendments to the U.S. Constitution and protected by 42 U.S.C. § 1983.

COUNT III
Equal Protection (*Bush v. Gore*) and 42 U.S.C. § 1983

U.S. Const. amend. XIV
Threatened Infringement of the Fourteenth Amendment's
Guarantee of Equal Protection

58. Plaintiff-Intervenors incorporate by reference and reallege paragraphs 1 to 58 of this Complaint as if set forth fully herein.

59. The First and Fourteenth Amendments do not permit the state to arbitrarily value the votes of one group of individuals over another. The Equal Protection Clause of the Fourteenth Amendment to the United States Constitution prohibits states from “deny[ing] to any person within its jurisdiction the equal protection of the laws.” U.S. CONST. amend. XIV, § 1. This constitutional provision requires “that all persons similarly situated should be treated alike.” *City of Cleburne v. Cleburn Living Ctr.*, 473 U.S. 432, 439 (1985); *see also Bush v. Gore*, 531 U.S. 98, 104-05 (2000) (holding Equal Protection Clause applies to “the manner of [the] exercise [of voting]” and “once granted the right to vote on equal terms, the State may not, by later arbitrary and disparate treatment, value one person’s vote over that of another”).

60. The fact that the interpretation of O.C.G.A. § 21-2-386(a)(1)(C) varies from county to county, Gwinnett County’s interpretation and implementation of O.C.G.A. § 21-2-386(a)(1)(C) plainly violates the Equal Protection Clause. “Having once granted the right to vote on equal terms, the State may not, by later arbitrary and disparate treatment, value one person’s vote over that of another.” *Id.*

61. Defendants knowingly treat or permit the treatment of electors who vote by mail in Gwinnett County differently from other, similarly situated electors voting in the same election in other counties in the State.

62. As shown by the substantial difference in rejection rates between Gwinnett County and Forsyth County, electors who vote by mail in Gwinnett County are far more likely to be disenfranchised than electors who vote by mail in other counties. Further, Defendant Secretary and the Defendant State Board Members have failed to ensure that Georgia absentee voters are treated equally regardless of the county they reside.

63. Due to this disparate treatment, absentee voters in Gwinnett County who cast ballots in the November 6, 2018 General Election have suffered burdens on and infringements to their fundamental right to vote that other, similarly situated voters in other counties have not.

64. Defendants' unequal treatment of these voters is not justified by, and is not necessary to promote, any substantial or compelling state interest that cannot be accomplished by other, less restrictive means.

65. Scores of eligible, registered Gwinnett County absentee voters will suffer direct and irreparable injury if Defendants are not enjoined from rejecting otherwise valid absentee ballots on the basis of the most insignificant of technical

violations described herein, where these minor technical violations could not reasonably be interpreted to mean that the voter is ineligible to cast the ballot or that the ballot is otherwise invalid.

66. Based on the foregoing, Defendants, acting under color of state law, have deprived and will continue to deprive Plaintiff-Intervenors and other Georgia voters of equal protection under the law secured to them by the Fourteenth Amendment to the United States Constitution and protected by 42 U.S.C. § 1983.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff-Intervenors respectfully request that this Court enter judgment:

- a) declaring that for Defendants to reject absentee ballots for omitting or making mistakes in immaterial information on a voter's absentee ballot envelope, such as in the date of birth or address fields, would violate the First and Fourteenth Amendments to the United States Constitution;
- b) preliminarily and permanently enjoining Defendants from rejecting any absentee ballot on the basis that a voter omitted or allegedly made a mistake when filling in immaterial information on his or her absentee ballot envelope;

- c) requiring Defendants to count all absentee ballots that were previously rejected solely on the basis that a voter omitted or allegedly made a mistake when filling in immaterial information on his or her absentee ballot envelope;
- d) requiring Defendants to permit voters whose absentee ballots were previously rejected for missing signatures to cure within three days of the issuance of the order in accordance with the provisional ballot cure process included in this Court's Order of October 24, 2018. *Martin*, Dkt. No. 23.
- e) temporarily enjoining Defendants from certifying the election results on November 13, 2018 until each and every absentee ballot that was improperly rejected has been counted;
- f) awarding Plaintiff-Intervenors their costs, disbursements, and reasonable attorneys' fees incurred in bringing this action pursuant to 42 U.S.C. § 1988 and other applicable laws; and
- g) granting such other and further relief as the Court deems just and proper.

Dated: November 11, 2018

Respectfully submitted,

/s/ Veronica Higgs Cope
GA Bar No.: 352145
The Cope Law Firm, P.C.
2330 Scenic Highway
Snellville, GA 30078
Telephone: (404) 917-1077
Facsimile: (866) 614-8295
vcope@copelawfirm.com

Marc E. Elias*
Bruce V. Spiva*
Brian Marshall*
Aria C. Branch*
K'Shaani Smith*
PERKINS COIE LLP
700 Thirteenth Street, N.W., Suite 600
Washington, D.C. 20005-3960
Telephone: (202) 654-6200
Facsimile: (202) 654-6211
MElias@perkinscoie.com
BSpiva@perkinscoie.com
BMarshall@perkinscoie.com
ABranch@perkinscoie.com
KShaaniSmith@perkinscoie.com

Counsel for Plaintiff-Intervenors

**Pro Hac Vice Applications Forthcoming*

VERIFICATION

I, Carolyn Bourdeaux, on behalf of Carolyn Bourdeaux for Congress, hereby certify that I am fully familiar with the facts and circumstances alleged in the foregoing Verified Emergency Complaint for Injunctive and Declaratory Relief. I have read the Verified Emergency Complaint for Injunctive and Declaratory Relief and affirm that, to the best of my personal knowledge, and based on my personal knowledge and the documents attached to the certification filed with this Verified Emergency Complaint for Injunctive and Declaratory Relief, the facts stated therein are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: November 11, 2018

CAROLYN BOURDEAUX
FOR CONGRESS

By:


Carolyn Bourdeaux

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing [Proposed] Plaintiff-Intervenors Carolyn Bourdeaux for Congress and Fazal Khan's Emergency Complaint for Injunctive and Declaratory Relief has been prepared in accordance with the font type and margin requirements of L.R. 5.1, using font type of Times New Roman and a point size of 14.

Dated: November 11, 2018

/s/ Veronica Higgs Cope
Counsel for Plaintiff-Intervenors

RETRIEVED FROM DEMOCRACYDOCKET.COM

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of November 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to parties in this action.

Dated: November 11, 2018

/s/ Veronica Higgs Cope
Counsel for Plaintiff-Intervenors

RETRIEVED FROM DEMOCRACYDOCKET.COM

EXHIBIT A

RETRIEVED FROM DEMOCRACYDOCKET.COM

Exhibit A: Secretary of State Status Reason for Rejected Absentees for Gwinnett County & Count by Category

SoS Status Reason	Count of personid	YOB omitted	YOB 2018 only	Address omitted	Add+YOB omitted	Unspecified	Signature match	Signature missing	Other
(null)	2					2			0
ADDRESS AND YOB MISSING	1				1				0
CURRENT YEAR AS DOB	1		1						0
CURRENT YEAR AS YEAR OF BIRTH	11		11						0
CURRENT YEAR AS YEAR OF BIRTH, SIG MATCH	1						1		0
CURRENT YEAR AS YOB	46		46						0
CURRENT YEAR AS YOB, SIG MISSING	1							1	0
Insufficient Oath Information	394					394			0
MISSING YOB AND SIG, RES ADDR NOT A MATCH	1							1	0
NO SIGNATURE	1							1	0
RE	1								1
RES ADDR AND YEAR OF BIRTH MISSING	18				18				0
RES ADDR MISSING	8			8					0
RES ADDR NOT A MATCH	52								52
RES ADR AND YOB MISSING	1				1				0
SIG AND YEAR OF BIRTH MISSING	1							1	0
SIG AND YOB NOT A MATCH	1						1		0
SIG MISSING	45							45	0
Signature Match	3						3		0
YEAR OF BIRTH AND SIG MISSING	11							11	0
YEAR OF BIRTH MISSING	265	265							0
YEAR OF BIRTH MISSING, SIG MISSING	1							1	0
YEAR OF BIRTH NOT A MATCH	6								6
YOB AND RES ADDR MISSING	2				2				0
YOB AND SIG MISSING	3							3	0
YOB AND SIG NOT A MATCH	1						1		0
YOB NOT A MATCH	29								29
Grand Total	907	265	58	8	22	396	6	64	88

EXHIBIT B

RETRIEVED FROM DEMOCRACYDOCKET.COM

County	Voter Regis	Last Name	First Name	Middle Na	Suffix	City	State	Zip Cod	Application	Ballot Stat	Status Reason
GWINNETT	10961715	CHEN	HANG-PONG			DULUTH	GA	30096	A	R	ADDRESS AND YOB MISSING
GWINNETT	10966513	PHILLIPS	LARRY	LAMONT	III	LAWRENCEVILLE	GA	30046	A	R	CURRENT YEAR AS DOB
GWINNETT	2727211	WILSON	BERNICE	GOLDIE		LAWRENCEVILLE	GA	30044	A	R	CURRENT YEAR AS YEAR OF BIRTH
GWINNETT	3709770	BLACKMON	TOMEKA			LAWRENCEVILLE	GA	30044	A	R	CURRENT YEAR AS YEAR OF BIRTH
GWINNETT	3720502	WILLIAMS	JOHN	WALTER		LAWRENCEVILLE	GA	30046	A	R	CURRENT YEAR AS YEAR OF BIRTH
GWINNETT	5053752	HUDSON	DARRELL			LAWRENCEVILLE	GA	30043	A	R	CURRENT YEAR AS YEAR OF BIRTH
GWINNETT	5799783	DAVIDSON	PANDORA	LAKEISHA		LAWRENCEVILLE	GA	30046	A	R	CURRENT YEAR AS YEAR OF BIRTH
GWINNETT	6027315	WILLIAMS	FLORA	BELLE		LOGANVILLE	GA	30052	A	R	CURRENT YEAR AS YEAR OF BIRTH
GWINNETT	7815499	BOYLES	HAROLD	TROY		LAWRENCEVILLE	GA	30044	A	R	CURRENT YEAR AS YEAR OF BIRTH
GWINNETT	7867534	ELIAS	ANDRES	RIVAS		LAWRENCEVILLE	GA	30046	A	R	CURRENT YEAR AS YEAR OF BIRTH
GWINNETT	8873187	AHMED	SHAHID	UDDIN		LAWRENCEVILLE	GA	30046	A	R	CURRENT YEAR AS YEAR OF BIRTH
GWINNETT	10548430	HENSLEY	RONALD	EMMANUEL		LAWRENCEVILLE	GA	30044	A	R	CURRENT YEAR AS YEAR OF BIRTH
GWINNETT	10947669	GURLEY	TROKON	TITUS		SUGAR HILL	GA	30518	A	R	CURRENT YEAR AS YEAR OF BIRTH
GWINNETT	10230928	OLOWOYO	ADESOLA	A		BUFORD	GA	30519	A	R	CURRENT YEAR AS YEAR OF BIRTH, SIG MATCH
GWINNETT	1476145	HNATOWICZ	TERESA	YEWON		LAWRENCEVILLE	GA	30043	A	R	CURRENT YEAR AS YOB
GWINNETT	2758898	BOYD	PHILANDER	R		DULUTH	GA	30096	A	R	CURRENT YEAR AS YOB
GWINNETT	2808920	WOOD	DEBORAH	ANN		BUFORD	GA	30518	A	R	CURRENT YEAR AS YOB
GWINNETT	2820127	SEAMAN	ELEANOR	C		DULUTH	GA	30096	A	R	CURRENT YEAR AS YOB
GWINNETT	2852747	JOHNSON-BATTLE	ROSALIND	VANESSA		LAWRENCEVILLE	GA	30046	A	R	CURRENT YEAR AS YOB
GWINNETT	2872850	ONEAL	BRENDA	DENISE		NORCROSS	GA	30071	A	R	CURRENT YEAR AS YOB
GWINNETT	2905502	WILLIAMS	ALLIE	GLYN		LAWRENCEVILLE	GA	30044	A	R	CURRENT YEAR AS YOB
GWINNETT	3416389	WASHINGTON	JERMANIA			LOGANVILLE	GA	30052	A	R	CURRENT YEAR AS YOB
GWINNETT	3981837	CHIU	CHIUNG	CHEN		DULUTH	GA	30096	A	R	CURRENT YEAR AS YOB
GWINNETT	4047900	JOUBERT	LAFONTANT			SUWANEE	GA	30024	A	R	CURRENT YEAR AS YOB
GWINNETT	4219448	BRUNSON	SAMUEL	MARK		LAWRENCEVILLE	GA	30045	A	R	CURRENT YEAR AS YOB
GWINNETT	4323449	FARMER	BARBARA	DIANE		MILBURN	GA	30047	A	R	CURRENT YEAR AS YOB
GWINNETT	4500601	WEBSTER	DAVID	A	JR	BUFORD	GA	30518	A	R	CURRENT YEAR AS YOB
GWINNETT	5088253	LE	GIOT	VAN		LAWRENCEVILLE	GA	30044	A	R	CURRENT YEAR AS YOB
GWINNETT	5322421	LITTLES	MELINDA	ROBERTA		DULUTH	GA	30096	A	R	CURRENT YEAR AS YOB
GWINNETT	5550244	WEBB	GARY	RAYMOND		BUFORD	GA	30519	A	R	CURRENT YEAR AS YOB
GWINNETT	5721223	DUONG	CHUC			LAWRENCEVILLE	GA	30044	A	R	CURRENT YEAR AS YOB
GWINNETT	5832406	HUANG	CHRISTY	LING		DULUTH	GA	30097	A	R	CURRENT YEAR AS YOB
GWINNETT	6021806	DANIEL	ERICA	ROCHELLE		BUFORD	GA	30519	A	R	CURRENT YEAR AS YOB
GWINNETT	6265618	LANKFORD	LACHERYLE	AIDA		LAWRENCEVILLE	GA	30045	A	R	CURRENT YEAR AS YOB
GWINNETT	6895343	TRAILLE	JUSTIN	E		DULUTH	GA	30096	A	R	CURRENT YEAR AS YOB
GWINNETT	7091523	MANUEL	TAYNA	TYLER		NORCROSS	GA	30093	A	R	CURRENT YEAR AS YOB
GWINNETT	7175320	WRIGHT	LAWRENCE	ANTHONY		LAWRENCEVILLE	GA	30043	A	R	CURRENT YEAR AS YOB
GWINNETT	7273120	HAYGOOD	BEVERLEY	WOODS		LAWRENCEVILLE	GA	30043	A	R	CURRENT YEAR AS YOB
GWINNETT	7488451	LAMBAREN	EDWARD	DAVID	SR	LAWRENCEVILLE	GA	30043	A	R	CURRENT YEAR AS YOB
GWINNETT	7831071	JOHNSON	DENISE	D		GRAYSON	GA	30017	A	R	CURRENT YEAR AS YOB
GWINNETT	7911488	PARKER	KEVIN	LEE		DORAVILLE	GA	30340	A	R	CURRENT YEAR AS YOB
GWINNETT	8072115	JOUBERT	YOLETTE			SUWANEE	GA	30024	A	R	CURRENT YEAR AS YOB

GWINNETT	8368927	TANG	JINNY	CHEN		LAWRENCEVILLE	GA	30044	A	R	CURRENT YEAR AS YOB
GWINNETT	8433260	ALPHA	BERNARD			LOGANVILLE	GA	30052	A	R	CURRENT YEAR AS YOB
GWINNETT	8662270	NGUYEN	TU	THI		LAWRENCEVILLE	GA	30044	A	R	CURRENT YEAR AS YOB
GWINNETT	8717291	MATTISON	KEVIN	ANTHONY		LOGANVILLE	GA	30052	A	R	CURRENT YEAR AS YOB
GWINNETT	8866973	SIMS	VERMENTENE			LAWRENCEVILLE	GA	30046	A	R	CURRENT YEAR AS YOB
GWINNETT	10089557	DUONG	PHUONG	HONG THI LAC		LAWRENCEVILLE	GA	30044	A	R	CURRENT YEAR AS YOB
GWINNETT	10317831	SKLAR	HILLARY	REBECCA		DULUTH	GA	30096	A	R	CURRENT YEAR AS YOB
GWINNETT	10350873	MITCHELL	KRYSTAL	MICHELLE		DULUTH	GA	30097	A	R	CURRENT YEAR AS YOB
GWINNETT	10473707	AMANE	NASSER	MOHAMMED		DULUTH	GA	30096	A	R	CURRENT YEAR AS YOB
GWINNETT	10577638	CHAKRAVARTHY	KAMAL			DULUTH	GA	30097	A	R	CURRENT YEAR AS YOB
GWINNETT	10581336	BRUMANT	CLAUDETTE			BUFORD	GA	30519	A	R	CURRENT YEAR AS YOB
GWINNETT	10814647	LANKFORD	JAMES	LEE	III	LAWRENCEVILLE	GA	30045	A	R	CURRENT YEAR AS YOB
GWINNETT	11064700	DAYANI	NIZAR			DULUTH	GA	30097	A	R	CURRENT YEAR AS YOB
GWINNETT	11260332	CHAVIS	BLAKE	T		LAWRENCEVILLE	GA	30044	A	R	CURRENT YEAR AS YOB
GWINNETT	11264011	RIDDICK	TAKIYAH	NATHIFA		LAWRENCEVILLE	GA	30046	A	R	CURRENT YEAR AS YOB
GWINNETT	11408641	MCDONALD	EUPHEMA			GRAYSON	GA	30017	A	R	CURRENT YEAR AS YOB
GWINNETT	11416226	HAYGOOD	GENE	MILTON		LAWRENCEVILLE	GA	30043	A	R	CURRENT YEAR AS YOB
GWINNETT	11498135	BOWER	CAROLINE	HELEN		PEACHTREE	GA	30092	A	R	CURRENT YEAR AS YOB
GWINNETT	10011296	ADEYEMO	ADEFEMI	O		LAWRENCEVILLE	GA	30045	A	R	CURRENT YEAR AS YOB, SIG MISSING
GWINNETT	2993	HUDMON	MICHAEL	D		SUWANEE	GA	30024	A	R	Insufficient Oath Information
GWINNETT	118803	HERBERT	LARRY	RUFUS	JR	DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	237090	STOVALL	TALEDA	MICHELLE		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	297746	BERRY	SIDNEY	LANIER		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	326676	DOUGLAS	DENISE	CASE		SNELLVILLE	GA	30078	A	R	Insufficient Oath Information
GWINNETT	825057	SARRETT	MARY	HORNBUCKLE		SNELLVILLE	GA	30078	A	R	Insufficient Oath Information
GWINNETT	1181046	MCCRACKIN	PRESTON	KEITH		LAWRENCEVILLE	GA	30045	A	R	Insufficient Oath Information
GWINNETT	1879132	AGUILAR	GUIDO			SUWANEE	GA	30024	A	R	Insufficient Oath Information
GWINNETT	1908897	BROYLES	MATTHEW	TODD		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	1959077	SLATON	PIPER	KIM		GRAYSON	GA	30017	A	R	Insufficient Oath Information
GWINNETT	2014287	KIM	WON	K		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	2109834	STANLEY	VINCENT	ZIMBALIST		NORCROSS	GA	30093	A	R	Insufficient Oath Information
GWINNETT	2529641	SHERR	JODY	NECHA		LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	2629584	WOZNAK	RAYMOND	LAWRENCE		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	2722258	CLARK	CORINE	DODD		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	2722292	HARRISON	AUDREY	MAE		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	2723107	MASON	DORIS	V		GRAYSON	GA	30017	A	R	Insufficient Oath Information
GWINNETT	2726428	HENDERSON	NANCY	JUNE		GRAYSON	GA	30017	A	R	Insufficient Oath Information
GWINNETT	2728039	BROWN	WINNIE	SUE		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	2730361	BROOKS	BROUGHTON			BUFORD	GA	30518	A	R	Insufficient Oath Information
GWINNETT	2730362	BROOKS	EMMALINE			BUFORD	GA	30518	A	R	Insufficient Oath Information
GWINNETT	2730511	GARRETT	EVELYN	CLAUDEAN		BUFORD	GA	30518	A	R	Insufficient Oath Information
GWINNETT	2734548	BRADSHAW	RUTH	ELLEN		SNELLVILLE	GA	30078	A	R	Insufficient Oath Information
GWINNETT	2735653	WILLIAMSON	ARTHUR	VIRGIL		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information

GWINNETT	2735915	SUMMERS	CATHY	ELANE		LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	2737720	CUNNINGHAM	ANNIE	JEAN		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	2753320	VINEYARD	JANE	M		DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	2762270	RUTHERFORD	RUBY	LEE		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	2762405	BROWN	LINDA	GAIL		NORCROSS	GA	30093	A	R	Insufficient Oath Information
GWINNETT	2798304	WILSON	GARY	STEPHEN		LOGANVILLE	GA	30052	A	R	Insufficient Oath Information
GWINNETT	2798317	WATSON	LISA	L		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	2806490	VEAL	WENDEL	RAY		SUWANEE	GA	30024	A	R	Insufficient Oath Information
GWINNETT	2821970	LEE	JONG	C		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	2824293	ROBERTSON	MILDRED	BISHOP		BUFORD	GA	30518	A	R	Insufficient Oath Information
GWINNETT	2829060	SHAMBURGER	SANDRA	KAYE		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	2830917	BALAGURU	SAROJINI			SUWANEE	GA	30024	A	R	Insufficient Oath Information
GWINNETT	2831950	FENNELL	NENA	HALL		SNELLVILLE	GA	30078	A	R	Insufficient Oath Information
GWINNETT	2832115	FENNELL	MITCHELL	T		SNELLVILLE	GA	30078	A	R	Insufficient Oath Information
GWINNETT	2833557	TAN	DAVID	AUGUSTINE		SNELLVILLE	GA	30078	A	R	Insufficient Oath Information
GWINNETT	2838936	TOWNSEND	CARL	PIERRE		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	2841138	LIU	ANGELA	MEI-YUNG		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	2841545	DURDEN	ANNIE	BELL		LOGANVILLE	GA	30052	A	R	Insufficient Oath Information
GWINNETT	2850968	JOHNSON-WARD	LINDA	J		SUWANEE	GA	30024	A	R	Insufficient Oath Information
GWINNETT	2856602	ALAGAPPAN	VASANTHA			DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	2863489	BARANOWSKI	CHARLES	EDWARD		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	2867230	SUMMERS	SAMUEL	GARY		LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	2869258	SMITH	JOHN	A		SUWANEE	GA	30024	A	R	Insufficient Oath Information
GWINNETT	2881373	HAROZ	PINHAS	HORSHOVSKI		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	2889718	HARGROVE	MARCELLA	T		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	2889719	HARGROVE	MARLIN	HOYT		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	2893969	EDWARDS	JOSEPHINE	H		BUFORD	GA	30518	A	R	Insufficient Oath Information
GWINNETT	2899649	SMITH	CHARLENE	B		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	2899650	SMITH	JOHN	LARRY		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	2900898	EDWARDS	KATHY	ANN		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	2908848	HAND	QUENTIN	LAMOIN		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	2916175	DIXON	BENJAMIN	A		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	2918409	FORBES	PAULA	M		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	2951490	GOMEZ	ELSA			DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	3348275	GUM	KELLY	ANN		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	3350684	BOWENS	ROSA	C		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	3373224	CLICK	DIANA	LEE		LOGANVILLE	GA	30052	A	R	Insufficient Oath Information
GWINNETT	3513740	KANG	CHE UK	UK		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	3568830	LOPEZ	JANETTE	LEE		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	3672880	MEHRJERDIAN	MOHSEN			LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	3725824	LE	PHAN			LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	3943075	DORROUGH	RANDY	EUGENE		SUWANEE	GA	30024	A	R	Insufficient Oath Information
GWINNETT	4001397	COPLIN-BEY	CHARLES	S		LOGANVILLE	GA	30052	A	R	Insufficient Oath Information

GWINNETT	4015338	LE	QUYEN	THI		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	4023915	JESTER	DONALD	L		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	4079757	HUYNH	TAM	THANH		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	4092526	SKOOG	KEVIN	LEE		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	4205604	SEGARRA	ERNESTO	JUAN		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	4207229	SEGARRA	IRIS	N		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	4248650	BOOKER	ANTHONY			BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	4269572	HENDERSON	LILLIE	SHARON		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	4296226	DURDEN	JERRY			LOGANVILLE	GA	30052	A	R	Insufficient Oath Information
GWINNETT	4299173	KUROSAKA	KAZUKO			DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	4299174	KUROSAKA	MITSUO			DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	4327283	BEVIL	TIMOTHY	JAMES		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	4340506	BASRA	HARI	CHAND		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	4345569	ANTHONY	DOUGLAS	TERRY		SUGAR HILL	GA	30518	A	R	Insufficient Oath Information
GWINNETT	4407164	GARRISON	CHARLES	MCLGRATTON		SNELLVILLE	GA	30078	A	R	Insufficient Oath Information
GWINNETT	4410824	LIN	EMILY	YAMEI		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	4563721	CRESSMAN	HARRY	EUGENE		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	4576484	GUPTA	KAMAL	K		SUWANEE	GA	30024	A	R	Insufficient Oath Information
GWINNETT	4582416	HOPKINS	CATHERINE	MARIE		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	4586205	CANCINO	EDGARDO	ALEJANDRO JR		DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	4628947	MOHAMED	SAADA	AHMED		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	4686765	MITCHELL	TERRY	S		LOGANVILLE	GA	30052	A	R	Insufficient Oath Information
GWINNETT	4734099	SALIM	GAIL	FAZIA FARIDA		GRAYSON	GA	30017	A	R	Insufficient Oath Information
GWINNETT	4759987	BUSTER	PERRY	L		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	4797047	LEWIS	ANDREA	NICHOLA		LAWRENCEVILLE	GA	30045	A	R	Insufficient Oath Information
GWINNETT	4807634	WALKER	KATIE	IDA MAE		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	4808358	NGUYEN	TUNG	NGOC		DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	4841164	NGUYEN	HIEN	THE		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	4842398	TON	HUE	NU		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	4853884	TYSON	URSULA	ANDREA		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	4865084	BRINSON	LEILA	NAN		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	5011571	JOHNSON	THOMAS			LAWRENCEVILLE	GA	30045	A	R	Insufficient Oath Information
GWINNETT	5013242	TRAN	TINA			LAWRENCEVILLE	GA	30045	A	R	Insufficient Oath Information
GWINNETT	5070227	NGUYEN	THANH			DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	5071257	SALAZAR	MANUEL	ANTONIO		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	5093264	TAN	KIM	HEOH		SNELLVILLE	GA	30078	A	R	Insufficient Oath Information
GWINNETT	5106402	BAHTA	DANIEL	N		NORCROSS	GA	30093	A	R	Insufficient Oath Information
GWINNETT	5123902	POLLARD	CAROLYN			NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	5140339	EALY	MEIIESHA	QUMAE		LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	5146692	CLARK	AUDIE	LEE		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	5156032	HALE	MICHAEL	L		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	5202732	ADAMS	RONALD	WAYNE	II	SNELLVILLE	GA	30078	A	R	Insufficient Oath Information
GWINNETT	5226704	PAUL	MARIE	ANNE		SUWANEE	GA	30024	A	R	Insufficient Oath Information

GWINNETT	5363871	BERGBOWER	STEPHEN	CHRISTOPHER	SNELLVILLE	GA	30078	A	R	Insufficient Oath Information
GWINNETT	5394818	SIMPSON	RICHARD	R	LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	5401515	SALAZAR	MELITINA	CRISTINA	LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	5447675	MERRITT	EMMANUEL	TRENCELL	LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	5449985	SESSION	MICHAEL		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	5493756	FOSTER	RIKIO	MASTUNAGA	LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	5506305	SUNSARAPANG	SUMIT		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	5536660	LIU	XINTAO		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	5579089	VO	YEN		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	5590558	BOATENG	OPONG		LAWRENCEVILLE	GA	30045	A	R	Insufficient Oath Information
GWINNETT	5611161	BROWN	JENNIFER	BETH	LOGANVILLE	GA	30052	A	R	Insufficient Oath Information
GWINNETT	5625816	KIM	GINE	OK	DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	5655173	CARTER	VEARLYNN		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	5742090	VICKERS	MARGARET	SPENCER	LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	5831987	MAHARJAN	MOHAN	KAJI	DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	5846067	METUKMEBONG	ISAAC	E	LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	5868427	SALIM	MOHAMMED		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	5869023	NGUYEN	HA	THUONG	NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	5885435	DANG	BE	VAN	NORCROSS	GA	30093	A	R	Insufficient Oath Information
GWINNETT	5885439	DANG	MINH	DUC	NORCROSS	GA	30093	A	R	Insufficient Oath Information
GWINNETT	5889362	WYATT	ANTONY	DAVID	NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	5905538	MAI	LIEM		LAWRENCEVILLE	GA	30045	A	R	Insufficient Oath Information
GWINNETT	5921240	BEHARIE	PEGGY	OBRIEN	DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	5939855	KWON	SHALLY	MYUNGSOON	DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	5941634	NGUYEN	TICH		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	5942390	TRAN	DON	LINH	DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	5987752	SMITH	JOHN	HENRY	BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	5998421	ONYEKABA	MERCY	N	DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	6006199	PATEL	KANTA	MANGU	LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	6026287	MILLER	KIMBERLY	ANNE	PEACHTREE	GA	30096	A	R	Insufficient Oath Information
GWINNETT	6026502	CHARLOTIN	ROSELENE		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	6119112	NGUYEN	DOI		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	6137002	WILKINS	APRIL	PATRICIA	LAWRENCEVILLE	GA	30045	A	R	Insufficient Oath Information
GWINNETT	6141704	BAIRE	ASTER	TEWOLDE	NORCROSS	GA	30093	A	R	Insufficient Oath Information
GWINNETT	6186761	BRANNAN	DAVID	CAREY JR	GRAYSON	GA	30017	A	R	Insufficient Oath Information
GWINNETT	6190199	CLEVELAND	LAURA LEE	DENHAM	DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	6194745	DYCK	BARBARA	L	LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	6200078	SALIM	LEONARD		GRAYSON	GA	30017	A	R	Insufficient Oath Information
GWINNETT	6201026	JUNG	MYUNG	S	DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	6205883	ROMERO	ALFREDO		LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	6226472	TRAN	JACKSON		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	6289971	ALI	MANZOOR	SHEIKH	SNELLVILLE	GA	30078	A	R	Insufficient Oath Information
GWINNETT	6347578	JOSEPH	JESSY		BUFORD	GA	30519	A	R	Insufficient Oath Information

GWINNETT	6351888	PUTHIYAVEETIL	BABY	J		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	6354842	HOANG	CANH	NGOC		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	6363787	PHAN	TRUONG	T		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	6438389	ABSHIR	FATUMA			DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	6466919	RICHARD	GHISLAINE			LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	6502828	GREEN	ROSALIND			NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	6517400	SAMUEL	NINAN			LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	6522385	RICHIE	GEORGE	FRANCIS		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	6576969	GOODWIN	KON	SOO		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	6634803	FINLEY	DARLENE			DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	6640355	LEE	KOON	JA		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	6690810	ENGLAND	LEYLA			BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	6716130	MORGAN	MILES	ARDELL		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	6717841	TOWNSEND	BEVERLY	ANN J		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	6728304	REDMOND	DAPHNE	HARRIS		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	6776364	WALKER	JENNIFER	ANN		DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	6818668	ZHOU	HUA	CHANG		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	6845042	HUYNH	MINH	LE		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	6864402	WOOD	MARCUS	CLAY		SUWANEE	GA	30024	A	R	Insufficient Oath Information
GWINNETT	6898777	FOSTER	RICKISHA	ARTRIECE		SUWANEE	GA	30024	A	R	Insufficient Oath Information
GWINNETT	6929880	FRENCH	ROBERT	MICHAEL	JR	LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	6957948	DANG	THANH	THI		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	6999072	YIM	BRUCE	HWAYONG		DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	7050383	NGUYEN	DUKE	T		LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	7067407	VUNDI	KABULAND	LEA		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	7079414	KIM	SE	DO		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	7095390	DAO	HUE	VAN	SR	LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	7117772	BHATT	DILIPKUMAR	B		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	7128229	LEOS	LORENA			NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	7143595	JOHNSON	DAKARAI	S		NORCROSS	GA	30093	A	R	Insufficient Oath Information
GWINNETT	7158260	NGUYEN	HAI	THANH		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	7178607	LAMBOY	MINA	C		SUWANEE	GA	30024	A	R	Insufficient Oath Information
GWINNETT	7199715	JOHN	SHERLY	JOSEPH		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	7221122	SARPONG	YAA			LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	7225272	AGRONOW	CHRISTY	MARIE		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	7226784	LAM	THANH	QUOC		LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	7228014	NEWTON	JAMES	PIERCE		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	7263286	REYES	JOSE	ANTONIO		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	7274649	PEREZ	JOSE	RAFAEL		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	7334922	PATEL	MANGU	BHAGA		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	7337590	HUDA	FATIMA	JAHURA		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	7342885	YI	CHONG	SUN		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	7385669	GRAHAM	MARY	LEE		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information

GWINNETT	7386479	DVORKIN	MIKHAIL	LEONIDOVICH	LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	7386532	DVORKIN	LEONID	YAKOVLEVICH	LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	7417833	TACURY	CELSO	V	LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	7440755	YU	HANG	VINH	NORCROSS	GA	30093	A	R	Insufficient Oath Information
GWINNETT	7447529	LE	SANG	NGOC	DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	7458185	WANG	CHU KUEI		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	7471400	NGUYEN	TUAN	TRONG	LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	7486028	DOAN	MY DUNG	THI	DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	7510326	LE	TAM	THI	LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	7517799	NGO	DINH	TRUNG	LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	7543112	NGUYEN	MY	THI TRA	NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	7579958	WOOD	ASHLEY	HYDE	SUWANEE	GA	30024	A	R	Insufficient Oath Information
GWINNETT	7606096	DEWALT	JANIE	ADOROTHY	DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	7606953	SIMMONS	ANDRE	G	LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	7651277	HOWARD	SHONDALE	DEONDRA	GRAYSON	GA	30017	A	R	Insufficient Oath Information
GWINNETT	7659730	MACALUSO	BETTY	RUTH	LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	7695456	JAHANI	ZULFIKAR	P	LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	7718233	FARR	MARGARET	C	BUFORD	GA	30518	A	R	Insufficient Oath Information
GWINNETT	7730924	JAQUEZ	RAMON		GRAYSON	GA	30017	A	R	Insufficient Oath Information
GWINNETT	7758529	DONGOL	NARAYANI		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	7789012	MASON	ANTUANE	TIAWANE	LOGANVILLE	GA	30052	A	R	Insufficient Oath Information
GWINNETT	7814399	CRAWLEY	LENORA	HELEN	LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	7846222	HASSAN	KHANDOK	SHAMIMUL	LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	7862966	VALE	MARIBEL	Y	LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	7866789	DANG	AN	THIEN	NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	7975307	RILEY	VICTORIA	ELAINE	LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	8004449	WILLIAMS	JESSICA	RENAE	DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	8029544	BURY	RALPH		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	8032456	BURSON	HAROLD	JUNIOR	NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	8040737	SAAD	VICTOR	KAMEL	LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	8051841	YUN	CHARLES	H	DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	8107766	REID	BRIAN	DANIEL	LOGANVILLE	GA	30052	A	R	Insufficient Oath Information
GWINNETT	8166623	MOSES	LILLIE	R	LOGANVILLE	GA	30052	A	R	Insufficient Oath Information
GWINNETT	8179743	FRANCIS	PERLINE	ALICE	LAWRENCEVILLE	GA	30045	A	R	Insufficient Oath Information
GWINNETT	8205571	DANG	CHAU	MINH	LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	8205666	TRIEU	HOA	T	LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	8219158	MAMMEN	SHIJI		LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	8219674	VU	HANNAH		LAWRENCEVILLE	GA	30045	A	R	Insufficient Oath Information
GWINNETT	8241493	NGUYEN	THANH		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	8259589	JENKINS	KELLEY	MORGAN	LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	8300382	CHEKOUA	FABRICE	WANSI	LAWRENCEVILLE	GA	30045	A	R	Insufficient Oath Information
GWINNETT	8301255	HONG	EUGENE	C	DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	8319214	BONNER	LINDA	SUSAN	LAWRENCEVILLE	GA	30045	A	R	Insufficient Oath Information

GWINNETT	8358004	GALA	CHANDU			DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	8372027	TOLLIVER	JACQUELIN	ELAINE		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	8406814	CARTER	MIATIKA	GWYNETTE		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	8407279	JORDAN	JEFFREY	LYNN		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	8439191	NGUYEN	STEVEN	DUC		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	8474483	ANDERSON	BEVERLY	ANN		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	8492633	YI	BOB	E		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	8542551	GADIE	KENDALL	JERRELL		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	8544432	ORTEGA-BARDALES	MAURO			LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	8564684	PATEL	JAGDISHBH	C		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	8564688	PATEL	KAMINIBEN	J		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	8568137	GLASGOW	STELLA	MARGARET		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	8582880	AKHTER	FARHANA			NORCROSS	GA	30093	A	R	Insufficient Oath Information
GWINNETT	8602215	FERNALD	KYUNGHYC	ABBY		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	8632770	SHAHABUDDIN	ABU	NAEEM		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	8640761	GRIFFIN	EMMA	BROWN		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	8667944	GALLO	ASHIA	CORRINE		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	8685567	LE	RO	VAN		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	8700912	HENNEBERG-VERITY	NATHAN	F		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	8702973	TRAN	THANH	LOAN THI		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	8723400	TRAN	HUU	CHI		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	8734196	BELACHEW	YOHANNES	A		PEACHTREE	GA	30096	A	R	Insufficient Oath Information
GWINNETT	8796079	LEE	KEE YOUNG			LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	8797104	REYES	MARIA	SANTOS		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	8799428	WEBSTER	SHIRLEY			LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	8807643	JAHAN	SHARMIN			DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	8832523	DEMUYAKOR	GEORGE			BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	8853628	BANKS	ANTHONY	CLARENCE Q		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	8866529	CAMARA	DIEYNABA			NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	8873894	JOSEPH	MATHEW			BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	10037382	MAREDA	IQBAL	N		DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	10037886	KANG	YONG	HUI		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	10055843	LEE	ASA	NAJEAN DESHA		SUWANEE	GA	30024	A	R	Insufficient Oath Information
GWINNETT	10056209	LUU	MACKIE			NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	10061498	KARLINS	CYDNEY	JARA		SUWANEE	GA	30024	A	R	Insufficient Oath Information
GWINNETT	10070675	MCKENZIE	ALEXIS	NOLA		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	10082180	ALQASAMI	QADRIA	ABDUL W		GRAYSON	GA	30017	A	R	Insufficient Oath Information
GWINNETT	10097257	NAHAR	NAZNIN			LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	10110065	TRUONG	SANH	THI		LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	10113303	JULOW	LILLIAN	KAYTE		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	10116220	RUIZ	KENIA	MICHELLE		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	10141751	DANG	MARY	TRAM ANH		NORCROSS	GA	30093	A	R	Insufficient Oath Information
GWINNETT	10157985	VO	MUNG	VAN		LILBURN	GA	30047	A	R	Insufficient Oath Information

GWINNETT	10158791	ABRAM	VENESSA	DEAN		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	10160966	SHIN	MYUNG	HEE		SUWANEE	GA	30024	A	R	Insufficient Oath Information
GWINNETT	10162886	SKINNER	YVONNE	DRUMMOND		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	10180064	ELLIS	IVANA	TRINDADE		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	10187533	RINEHART	CAROL	FRANCES		SNELLVILLE	GA	30078	A	R	Insufficient Oath Information
GWINNETT	10206691	HOWARD-BINDER	DARLEEN	B		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	10207559	PATEL	VIMLABEN			PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	10215760	DAVIS	GREGORY	JONATHAN JR		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	10219243	BHANWADIA	MUMTAZ	SALIM		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	10239052	YEAGLE	GUNTER	RAY		SNELLVILLE	GA	30078	A	R	Insufficient Oath Information
GWINNETT	10279463	LIM	PAUL	W		DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	10305199	JALLOH	MOHAMED	YALLOH		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	10311094	FIGUEIREDO	DEANNA	MARIE		LAWRENCEVILLE	GA	30045	A	R	Insufficient Oath Information
GWINNETT	10316428	LUU	GIAU	THI		LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	10325578	WASIF	AQIB	ALI		LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	10326349	KIM	CHUNG	CHIK		DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	10327905	KIM	YONG	SUK		DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	10361012	BLACK	INGRID	EILEEN		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	10361352	GEBREMICHEAL	TEREFE	WONDIMU		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	10379501	WALKER	YVETTE			LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	10381815	WILCOTS	DONTRE	MICHAEL		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	10434257	DELGADO	MARIA	JULIA		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	10438391	DE CASTRO	FERNANDO	JOSE SOUSA		SUGAR HILL	GA	30518	A	R	Insufficient Oath Information
GWINNETT	10441605	FRAZIER	ALEXANDR	DANIELLE		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	10451964	HA	GRACE	E		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	10459012	HUYNH	LINH	THITRUC		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	10459240	PHAN	THI THI	CAM		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	10470968	HUYNH	PHUONG	THI TRUC		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	10476634	BRANDY	JARED	EAMOS		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	10479234	COREAS	IVAN	THOMAS		LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	10498573	HINTON	SARAH	M		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	10507687	BUTLER	NELLIE	LONG		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	10574838	DUFFIELD	ELIZABETH	DESMOND		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	10581117	CORONADO	ROMELIA			DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	10589897	OSEI-GYAN	ISAAC			DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	10632404	NAEEM	SHOUNIMA			DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	10645579	CHUNG	HYUCK	HEE		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	10645595	CHUNG	BYUNG-HONG			DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	10664026	AHMED	ABDULKAR	MOHAMMED		LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	10664852	DHANANI	NADYA	K		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	10665347	KAKKANATTU	JOSEPH	JOHN		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	10678494	DHANANI	KAMRUDIN			LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	10682882	ESTABRIDIS	JOSE	ORLANDO		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information

GWINNETT	10687139	WILLIS	TOTIANNE	REBECCA		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	10698668	SMITH	ETHEL	L		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	10707074	JONES	DORION	QUILLAUN		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	10736892	TRAN	OTH			LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	10790828	CHO	YOUNGOK			DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	10791533	WALCH	JACOB	SCOTT		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	10793306	DO	MARYLIN	HUYNH		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	10793349	DONLEY	DORIS	JEAN		LAWRENCEVILLE	GA	30045	A	R	Insufficient Oath Information
GWINNETT	10795107	CRAWFORD	MARILYN	M		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	10798661	LOFTUS	JUDITH	L		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	10804071	JOHN	THOMAS			LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	10809390	YARBROUGH	EVELYN	G		LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	10827896	WATSON	JULIA			DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	10831316	MCKAY	SHEREDA	G		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	10833697	SAVAGE	SAMANTHA	RENEE		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	10865453	DELGADO ESTRELLA	MARIA	ELENA		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	10872417	LEE	IN YOUNG			DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	10930001	ROMERO	MARIA	E		LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	10949632	ROMERO CRUZ	MICHELLE			DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	10959862	THOMAS	ARNOLD	HAYWOOD		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	10960488	PHAN	HIEN	THE RIO		LAWRENCEVILLE	GA	30045	A	R	Insufficient Oath Information
GWINNETT	10962454	LI	MO			DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	10966437	WHITE	BRANDON			LOGANVILLE	GA	30052	A	R	Insufficient Oath Information
GWINNETT	10966843	KIM	WONTAE			LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	11047679	DOAN	PHUONG	TRUC THI		DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	11053197	NGUYEN	THUY	THI PHUONG		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	11143712	BOWEN	BRYCE	CHANDLER		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	11152489	KIM	JEONG	OK		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	11166507	PATEL	PUSHPABE	PARVINCHANDRA		DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	11166794	BRUNDAGE	PHYLLIS	ATHEA		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	11171420	DANG	MITCHELL	TRUC DUYN		NORCROSS	GA	30093	A	R	Insufficient Oath Information
GWINNETT	11194241	MELTON	NORMAN	KEITH		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	11244014	TRAN	NHAN	THI		LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	11290833	TRAN	HAO	CHI		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	11303448	MITCHELL	JOSIAH			DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	11306999	ARDILA	HELENA			LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	11318223	HUYNH	HOANG	VAN		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	11348709	MANTEGHI	SEDIGHEH			LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	11357771	DANTZLER	MARCLAY	EARL		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	11429339	JOHNSON	SAMUEL	HARRIS		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	11440492	SPENELLO	ANNA	LEIGH		PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	11443269	KIM	JASMINE	MADISON		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	11463070	NGUYEN	RIEM	HUU		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information

GWINNETT	11466743	NAVARRETE	ELIA			PEACHTREE	GA	30092	A	R	Insufficient Oath Information
GWINNETT	11492861	CHEN	DUN	LANG		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	11503118	LEE	OCK	BUM		SUWANEE	GA	30024	A	R	Insufficient Oath Information
GWINNETT	11506207	LE	NGUYET	MINH		NORCROSS	GA	30071	A	R	Insufficient Oath Information
GWINNETT	11506854	LEE	WON HOON			BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	11507046	TRAN	HONG NG	THI		LAWRENCEVILLE	GA	30046	A	R	Insufficient Oath Information
GWINNETT	11524366	CHU	KATINA	XUAN		DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	11530198	RICKETTS	STEVEN	RALSTON		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	11531777	CARMONA-PADRON	JESUS	ISRAEL		BUFORD	GA	30518	A	R	Insufficient Oath Information
GWINNETT	11554410	LEE	CHENG	CHUN YIN		DULUTH	GA	30096	A	R	Insufficient Oath Information
GWINNETT	11555326	LEE	LATONYA	ARSHEA		BUFORD	GA	30518	A	R	Insufficient Oath Information
GWINNETT	11555966	LEE	WILLIE	THOMAS II		BUFORD	GA	30518	A	R	Insufficient Oath Information
GWINNETT	11562277	JEAN	FRANTZ			LOGANVILLE	GA	30052	A	R	Insufficient Oath Information
GWINNETT	11564724	JEAN SALVADOR	MARIE	LOURDES		LOGANVILLE	GA	30052	A	R	Insufficient Oath Information
GWINNETT	11566516	PERSAUD	CHURAMAN			GRAYSON	GA	30017	A	R	Insufficient Oath Information
GWINNETT	11576660	LIRIANO	HAMLET	TOMAS		LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	11601814	NGUYEN	TUYET NHU	THI		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	11609941	CAO	MENGDE			SUWANEE	GA	30024	A	R	Insufficient Oath Information
GWINNETT	11610334	NGUYEN	HANH	HONG THI		LILBURN	GA	30047	A	R	Insufficient Oath Information
GWINNETT	11649035	KNUYCKY	NICHOLAS			LAWRENCEVILLE	GA	30044	A	R	Insufficient Oath Information
GWINNETT	11655462	SIMMONS	MAGGIE	GRACE		SNELLVILLE	GA	30078	A	R	Insufficient Oath Information
GWINNETT	11689649	PHAM	MOT	THI		LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	11708305	JIBREEN	JENA			LAWRENCEVILLE	GA	30043	A	R	Insufficient Oath Information
GWINNETT	11725995	CARSON	CAROLINE	ELIZABETH		BUFORD	GA	30519	A	R	Insufficient Oath Information
GWINNETT	11762813	WANG	PAUL	JHY-SHING		DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	11801998	WANG	SHOU-LU	GRACE		DULUTH	GA	30097	A	R	Insufficient Oath Information
GWINNETT	2801835	SHERRER	LAMURLE	J		DULUTH	GA	30096	A	R	MISSING YOB AND SIG, RES ADDR NOT A MATCH
GWINNETT	4849262	TAYLOR	TRAVIS	E		PEACHTREE	GA	30092	A	R	NO SIGNATURE
GWINNETT	2852595	HOLLEY	DEBORAH	BEARD		BUFORD	GA	30518	A	R	RE
GWINNETT	3732844	ADAMS	PETER	ANGELO		DULUTH	GA	30096	A	R	RES ADDR AND YEAR OF BIRTH MISSING
GWINNETT	4939083	WARREN	JIMMIE	LOUIS JR		SUGAR HILL	GA	30518	A	R	RES ADDR AND YEAR OF BIRTH MISSING
GWINNETT	6245731	LEMMA	HIRUT			LAWRENCEVILLE	GA	30043	A	R	RES ADDR AND YEAR OF BIRTH MISSING
GWINNETT	6379162	LEE	BAOSHENG			DULUTH	GA	30096	A	R	RES ADDR AND YEAR OF BIRTH MISSING
GWINNETT	6573264	BOSTON	PATTI	M		NORCROSS	GA	30071	A	R	RES ADDR AND YEAR OF BIRTH MISSING
GWINNETT	6924399	HO	MINH	HUE		LAWRENCEVILLE	GA	30043	A	R	RES ADDR AND YEAR OF BIRTH MISSING
GWINNETT	7039487	MARSHALL	ANTONINA			LAWRENCEVILLE	GA	30044	A	R	RES ADDR AND YEAR OF BIRTH MISSING
GWINNETT	7543721	HA	HOA	THIEU		LAWRENCEVILLE	GA	30043	A	R	RES ADDR AND YEAR OF BIRTH MISSING
GWINNETT	7613015	JAUDON	LATOYA			LOGANVILLE	GA	30052	A	R	RES ADDR AND YEAR OF BIRTH MISSING
GWINNETT	7658268	VASHI	SHAKUNT	VINOD		BERKELEY LAKE	GA	30096	A	R	RES ADDR AND YEAR OF BIRTH MISSING
GWINNETT	7830516	JEFFERSON	RANDY			DULUTH	GA	30096	A	R	RES ADDR AND YEAR OF BIRTH MISSING
GWINNETT	8660174	LAMBERTZ	DON	ALAN		LAWRENCEVILLE	GA	30046	A	R	RES ADDR AND YEAR OF BIRTH MISSING
GWINNETT	10037841	ORTIZ	ANA	PAULA		LAWRENCEVILLE	GA	30043	A	R	RES ADDR AND YEAR OF BIRTH MISSING
GWINNETT	10206175	MATHEW	SUCY			LAWRENCEVILLE	GA	30044	A	R	RES ADDR AND YEAR OF BIRTH MISSING

GWINNETT	10261889	HA	JANICE	KAIYUN		LAWRENCEVILLE	GA	30043	A	R	RES ADDR AND YEAR OF BIRTH MISSING
GWINNETT	10990150	HINSON	TARIN	RENEE		PEACHTREE	GA	30096	A	R	RES ADDR AND YEAR OF BIRTH MISSING
GWINNETT	11144013	WILSON	RAY	ANDRE		LAWRENCEVILLE	GA	30045	A	R	RES ADDR AND YEAR OF BIRTH MISSING
GWINNETT	11673419	HARP	MICHAEL	CRAIG		LAWRENCEVILLE	GA	30044	A	R	RES ADDR AND YEAR OF BIRTH MISSING
GWINNETT	2865553	MEWBOWN	LYDIA	VARGAS		PEACHTREE	GA	30092	A	R	RES ADDR MISSING
GWINNETT	3267927	DUNCAN	GEORGE	DERRY		BUFORD	GA	30518	A	R	RES ADDR MISSING
GWINNETT	5112757	NAVA	GENEVIEVE	MAGDALENA		LAWRENCEVILLE	GA	30046	A	R	RES ADDR MISSING
GWINNETT	5848775	HYMAN	JOAN	VILMA		BUFORD	GA	30519	A	R	RES ADDR MISSING
GWINNETT	6824895	CLARK	THOMAS	SAMUEL	JR	LILBURN	GA	30047	A	R	RES ADDR MISSING
GWINNETT	8242997	MALLORY	SHARON	DIANE		LAWRENCEVILLE	GA	30043	A	R	RES ADDR MISSING
GWINNETT	10402946	WILLIAMS	PATRICIA	ANN		BUFORD	GA	30518	A	R	RES ADDR MISSING
GWINNETT	11105688	ENRIQUEZ	BIANCA	MICHELE		GRAYSON	GA	30017	A	R	RES ADDR MISSING
GWINNETT	2724680	GATZ	JOYCE	MAE		SUWANEE	GA	30024	A	R	RES ADDR NOT A MATCH
GWINNETT	2733180	BAILEY	VIRGINIA	L		LAWRENCEVILLE	GA	30044	A	R	RES ADDR NOT A MATCH
GWINNETT	2761653	HARRISON	J	P		LAWRENCEVILLE	GA	30046	A	R	RES ADDR NOT A MATCH
GWINNETT	2761654	HARRISON	MARJORIE	C		LAWRENCEVILLE	GA	30046	A	R	RES ADDR NOT A MATCH
GWINNETT	2860935	MCEWEN	DONNA	WEIDNER		SUWANEE	GA	30024	A	R	RES ADDR NOT A MATCH
GWINNETT	4322356	WILSON	JESSICA	SIAS		BUFORD	GA	30518	A	R	RES ADDR NOT A MATCH
GWINNETT	4725606	VALLE CONCEPCION	CARLOS			SUWANEE	GA	30024	A	R	RES ADDR NOT A MATCH
GWINNETT	4790727	CABAN PEREZ	CANDIDA			SUWANEE	GA	30024	A	R	RES ADDR NOT A MATCH
GWINNETT	4812603	PEYER	BROCK	RICHARD		DULUTH	GA	30096	A	R	RES ADDR NOT A MATCH
GWINNETT	5979349	BEGUM	HALIMA			LAWRENCEVILLE	GA	30044	A	R	RES ADDR NOT A MATCH
GWINNETT	6044693	YOON	HYUK	SANG		DULUTH	GA	30096	A	R	RES ADDR NOT A MATCH
GWINNETT	6073267	MURPHY	BRYAN	JESSE		LAWRENCEVILLE	GA	30043	A	R	RES ADDR NOT A MATCH
GWINNETT	7060182	VEAZEY	MARK	WILLIAM		LILBURN	GA	30047	A	R	RES ADDR NOT A MATCH
GWINNETT	7061898	KIM	YOO	SOON		BUFORD	GA	30518	A	R	RES ADDR NOT A MATCH
GWINNETT	7447631	LEWIS	TERRI	ANN		LAWRENCEVILLE	GA	30044	A	R	RES ADDR NOT A MATCH
GWINNETT	8030093	MACKENZIE	JESSE	BROE		LAWRENCEVILLE	GA	30044	A	R	RES ADDR NOT A MATCH
GWINNETT	8146335	KLIBANOFF	PATRICK	WILLIAM		PEACHTREE	GA	30092	A	R	RES ADDR NOT A MATCH
GWINNETT	8174166	BOUCHI	YASIR	HAMZEH		LAWRENCEVILLE	GA	30043	A	R	RES ADDR NOT A MATCH
GWINNETT	8569888	SCHATELL	KEVIN	DREW		GRAYSON	GA	30017	A	R	RES ADDR NOT A MATCH
GWINNETT	8575486	BRITT	WILLIAM	MICHAEL		LAWRENCEVILLE	GA	30043	A	R	RES ADDR NOT A MATCH
GWINNETT	8577243	HUYNH	SUGA			LILBURN	GA	30047	A	R	RES ADDR NOT A MATCH
GWINNETT	8659812	BOYUM	SYDNEY	JANINE		BUFORD	GA	30518	A	R	RES ADDR NOT A MATCH
GWINNETT	10218479	AL-AMIN	HASSAN	SHAKIR		DULUTH	GA	30096	A	R	RES ADDR NOT A MATCH
GWINNETT	10218480	AL-AMIN	JEANETTE	JEWELS		DULUTH	GA	30096	A	R	RES ADDR NOT A MATCH
GWINNETT	10327195	CRUMRINE	JOHN	CONNOR		SUWANEE	GA	30024	A	R	RES ADDR NOT A MATCH
GWINNETT	10334664	LEE	LINDA	B		DULUTH	GA	30096	A	R	RES ADDR NOT A MATCH
GWINNETT	10458699	GARDNER	CAMERON	JOYCE		SNELLVILLE	GA	30078	A	R	RES ADDR NOT A MATCH
GWINNETT	10565007	GUNTER	CALVIN	ARNOLD		LAWRENCEVILLE	GA	30044	A	R	RES ADDR NOT A MATCH
GWINNETT	10575264	HAN	MONICA	KARAM		DULUTH	GA	30097	A	R	RES ADDR NOT A MATCH
GWINNETT	10646821	HASTINGS	ROSS	MICHAEL		LAWRENCEVILLE	GA	30043	A	R	RES ADDR NOT A MATCH
GWINNETT	10682293	EVANS	REAGAN			LAWRENCEVILLE	GA	30043	A	R	RES ADDR NOT A MATCH

GWINNETT	10682353	TURNER	VANESSA	LEE		BUFORD	GA	30518	A	R	RES ADDR NOT A MATCH
GWINNETT	10698911	TAYLOR	ANNA	ELISE		NORCROSS	GA	30071	A	R	RES ADDR NOT A MATCH
GWINNETT	10707105	ABISOYE	TEMITOPE			GRAYSON	GA	30017	A	R	RES ADDR NOT A MATCH
GWINNETT	10817067	HLAVA	JOHN	WILLIAM		SUWANEE	GA	30024	A	R	RES ADDR NOT A MATCH
GWINNETT	10980487	MEJIA	RAUL		JR	BUFORD	GA	30518	A	R	RES ADDR NOT A MATCH
GWINNETT	11045734	CHAPIN	ROBERT	LUTHER	JR	PEACHTREE	GA	30092	A	R	RES ADDR NOT A MATCH
GWINNETT	11108314	NEAL	NICKI	JOI		BUFORD	GA	30519	A	R	RES ADDR NOT A MATCH
GWINNETT	11114290	DIXON	JOE	J		BUFORD	GA	30518	A	R	RES ADDR NOT A MATCH
GWINNETT	11153093	TEAGUE	JAYLA	RENEE		DULUTH	GA	30097	A	R	RES ADDR NOT A MATCH
GWINNETT	11222528	HANBERRY	DANIEL	AUSTIN		SUWANEE	GA	30024	A	R	RES ADDR NOT A MATCH
GWINNETT	11247797	MOSS	RACHEL	SARAH		PEACHTREE	GA	30096	A	R	RES ADDR NOT A MATCH
GWINNETT	11324568	KIJEM	MIRANDA	AFUMBOM		BUFORD	GA	30519	A	R	RES ADDR NOT A MATCH
GWINNETT	11454046	CHASE	ALLISON	PAULINE		SUWANEE	GA	30024	A	R	RES ADDR NOT A MATCH
GWINNETT	11477960	CATTER	ANDRES	EMMANUEL		DULUTH	GA	30097	A	R	RES ADDR NOT A MATCH
GWINNETT	11531387	REED	CAITLIN	ELIZABETH		PEACHTREE	GA	30096	A	R	RES ADDR NOT A MATCH
GWINNETT	11539494	FORDHAM	THOMAS	ZACHERY		BUFORD	GA	30518	A	R	RES ADDR NOT A MATCH
GWINNETT	11545182	WILKINS	ALYSSA	LANE		DULUTH	GA	30097	A	R	RES ADDR NOT A MATCH
GWINNETT	11704589	WOODARD	LAURYN	T		BUFORD	GA	30519	A	R	RES ADDR NOT A MATCH
GWINNETT	11713280	VAN GUNDY	AVERY	MARIE		PEACHTREE	GA	30092	A	R	RES ADDR NOT A MATCH
GWINNETT	11748949	KALK	MADALYN	LOUISE		LAWRENCEVILLE	GA	30043	A	R	RES ADDR NOT A MATCH
GWINNETT	11766297	HASSAN	MAISHA	SAMIHA		LAWRENCEVILLE	GA	30043	A	R	RES ADDR NOT A MATCH
GWINNETT	4902986	DEL ANGEL	MARIA	ARCOS		LILBURN	GA	30047	A	R	RES ADR AND YOB MISSING
GWINNETT	10452125	PARK	YONG	WON		SUWANEE	GA	30024	A	R	SIG AND YEAR OF BIRTH MISSING
GWINNETT	2644272	ALLAN	RICHARD	WALTER		PEACHTREE	GA	30092	A	R	SIG AND YOB NOT A MATCH
GWINNETT	129103	PETTIGREW	MILDRED	MIMS		PEACHTREE	GA	30092	A	R	SIG MISSING
GWINNETT	2723213	SAGER	JAY	C		SNELLVILLE	GA	30078	A	R	SIG MISSING
GWINNETT	2742708	DAVIS	REUBEN	GLEN	JR	BUFORD	GA	30519	A	R	SIG MISSING
GWINNETT	2750807	LEWIS	GEORGE	KENNETH		LILBURN	GA	30047	A	R	SIG MISSING
GWINNETT	2760023	WARLICK	CALVIN	EUGENE		LAWRENCEVILLE	GA	30043	A	R	SIG MISSING
GWINNETT	2760288	PREHMUS	PAMELA	B		PEACHTREE	GA	30092	A	R	SIG MISSING
GWINNETT	2773320	ADDISON	ANGELIA	DARLENE		DULUTH	GA	30096	A	R	SIG MISSING
GWINNETT	2812664	SELLS	MARY	ENGLISH		LAWRENCEVILLE	GA	30046	A	R	SIG MISSING
GWINNETT	2818311	STAFFORD	RICHARD	F		LAWRENCEVILLE	GA	30044	A	R	SIG MISSING
GWINNETT	2842588	FEITT	MARGARET	ANNA		LAWRENCEVILLE	GA	30046	A	R	SIG MISSING
GWINNETT	2859097	DENNIS	LINDA	A		LAWRENCEVILLE	GA	30044	A	R	SIG MISSING
GWINNETT	2896284	HAWK	NELSON	G		LAWRENCEVILLE	GA	30045	A	R	SIG MISSING
GWINNETT	3843095	POSEY	KENNETH	DOW	III	DULUTH	GA	30096	A	R	SIG MISSING
GWINNETT	3855707	HITE	JOHN	CHANDLER		SUWANEE	GA	30024	A	R	SIG MISSING
GWINNETT	5798945	ESPAILLAT ALMANZA	LUIS	ANTONIO		NORCROSS	GA	30071	A	R	SIG MISSING
GWINNETT	6062919	KOMPANAL	THRESIAM	J		GRAYSON	GA	30017	A	R	SIG MISSING
GWINNETT	6264311	MATHEN	ANISH			LAWRENCEVILLE	GA	30043	A	R	SIG MISSING
GWINNETT	6514103	OREILLY	PATRICIA	LEE		BUFORD	GA	30519	A	R	SIG MISSING
GWINNETT	6523454	GUESS	JELAIN	RENEE		SUWANEE	GA	30024	A	R	SIG MISSING

GWINNETT	6698793	COOPER	WAYNE	JEFFREY		LAWRENCEVILLE	GA	30045	A	R	SIG MISSING
GWINNETT	7200283	THOMAS	ODECKA	ANNETTA		LAWRENCEVILLE	GA	30044	A	R	SIG MISSING
GWINNETT	7280054	THOMAS	KEVIN	VAUGHAN		LAWRENCEVILLE	GA	30044	A	R	SIG MISSING
GWINNETT	7595133	AVERY	PRECIOUS	B		LAWRENCEVILLE	GA	30046	A	R	SIG MISSING
GWINNETT	7599943	AMIN	URMILABE	B		LAWRENCEVILLE	GA	30044	A	R	SIG MISSING
GWINNETT	7671753	DICKS	LOLA			DULUTH	GA	30096	A	R	SIG MISSING
GWINNETT	7699985	JEMERSON	L	J		LAWRENCEVILLE	GA	30043	A	R	SIG MISSING
GWINNETT	7699991	JEMERSON	MAXINE	W		LAWRENCEVILLE	GA	30043	A	R	SIG MISSING
GWINNETT	8319657	SLATON O'CONNELL	KYAH	RAINE		BUFORD	GA	30519	A	R	SIG MISSING
GWINNETT	8713787	WALKER	JAMES	DANIEL		SUGAR HILL	GA	30518	A	R	SIG MISSING
GWINNETT	8784329	GREENE	MICHAEL		II	DULUTH	GA	30096	A	R	SIG MISSING
GWINNETT	8959277	SHAH	JIGNA			DULUTH	GA	30097	A	R	SIG MISSING
GWINNETT	10061076	RICHARDSON	BRYAN	LEE		LAWRENCEVILLE	GA	30043	A	R	SIG MISSING
GWINNETT	10113851	WINDHAM-GREEN	HENRY	ED		DULUTH	GA	30096	A	R	SIG MISSING
GWINNETT	10245074	HAWKINS	EUNICE	M		LOGANVILLE	GA	30052	A	R	SIG MISSING
GWINNETT	10425451	NGUYEN	LUAN	PHAM NGOC		NORCROSS	GA	30093	A	R	SIG MISSING
GWINNETT	10499177	VASQUEZ	NARCISA			LAWRENCEVILLE	GA	30043	A	R	SIG MISSING
GWINNETT	10789098	SHARMA	AANYA			SNELLVILLE	GA	30078	A	R	SIG MISSING
GWINNETT	10912906	CHOI	YOON	SUN		BUFORD	GA	30518	A	R	SIG MISSING
GWINNETT	10979988	TOLENTINO	MARIA			DORAVILLE	GA	30340	A	R	SIG MISSING
GWINNETT	11116257	WILLIAMS	BOBBY	SUE		PEACHTREE	GA	30092	A	R	SIG MISSING
GWINNETT	11233571	SATHE	GARGE			DULUTH	GA	30097	A	R	SIG MISSING
GWINNETT	11340916	ROMERO	JOCELYN	ELIZABETH		LAWRENCEVILLE	GA	30044	A	R	SIG MISSING
GWINNETT	11511838	ADAMS	JOAN	KELLER		LAWRENCEVILLE	GA	30043	A	R	SIG MISSING
GWINNETT	11606958	PEREZ	MARIA	DE LOS AN	SR	LAWRENCEVILLE	GA	30046	A	R	SIG MISSING
GWINNETT	11701285	EASTABROOK	CATHERINE			DULUTH	GA	30096	A	R	SIG MISSING
GWINNETT	4103929	BAILEY	SUZANNE			LAWRENCEVILLE	GA	30045	A	R	Signature Match
GWINNETT	4838643	SHULER	DARRELL	LAMONT		LOGANVILLE	GA	30052	A	R	Signature Match
GWINNETT	6177156	TRAN	HANH	VAN	SR	LILBURN	GA	30047	A	R	Signature Match
GWINNETT	2821693	PATE	BARBARA	L		LAWRENCEVILLE	GA	30044	A	S	voter requested
GWINNETT	7244578	GILLIAM	JANETTE	LANE		GRAYSON	GA	30017	A	S	voter requested
GWINNETT	8025473	RYAN	LAUREN	ELIZABETH		PEACHTREE	GA	30092	A	S	voter requested
GWINNETT	10096332	SALTERS	DEBORAH	W		LAWRENCEVILLE	GA	30045	A	S	voter requested
GWINNETT	11413591	GOLDSMITH	LYNELLE	EVANS		LAWRENCEVILLE	GA	30043	A	S	voter requested
GWINNETT	2736987	PITTMAN	JULIAN	VEAZY	JR	SUWANEE	GA	30024	A	R	YEAR OF BIRTH AND SIG MISSING
GWINNETT	2857720	POOLE	JOSEPHINE			LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH AND SIG MISSING
GWINNETT	4157156	DORSEY	ROSALYN	MARIE		BUFORD	GA	30518	A	R	YEAR OF BIRTH AND SIG MISSING
GWINNETT	6330341	MARTIN	SAMANTHA	LEE		LAWRENCEVILLE	GA	30046	A	R	YEAR OF BIRTH AND SIG MISSING
GWINNETT	6342989	AJMERI	HAMIDABE	A		DULUTH	GA	30097	A	R	YEAR OF BIRTH AND SIG MISSING
GWINNETT	7507652	STODDARD	JULIANN	MARIE		LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH AND SIG MISSING
GWINNETT	10787229	SIEVERS	SYLVIA	IVANA		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH AND SIG MISSING
GWINNETT	10807334	OU	MU			LILBURN	GA	30047	A	R	YEAR OF BIRTH AND SIG MISSING
GWINNETT	10874556	PHA	PREH			LILBURN	GA	30047	A	R	YEAR OF BIRTH AND SIG MISSING

GWINNETT	11444657	SOSA	RAY			LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH AND SIG MISSING
GWINNETT	11454890	HALL	LAKSHANA	ALEXIS		SUGAR HILL	GA	30518	A	R	YEAR OF BIRTH AND SIG MISSING
GWINNETT	175730	SHAH	MAHENDR	R		DULUTH	GA	30097	A	R	YEAR OF BIRTH MISSING
GWINNETT	313609	COMERFORD	JAN	DORIAN		SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	500417	BROCK	CINDY			NORCROSS	GA	30071	A	R	YEAR OF BIRTH MISSING
GWINNETT	1234432	SAMUEL	SABRINA	BOBETTE		PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	1458441	ALEXANDER	VAZHENAL	THOMAS		SNELLVILLE	GA	30078	A	R	YEAR OF BIRTH MISSING
GWINNETT	1491180	MCKETTRICK	WILLIAM	MARK		LAWRENCEVILLE	GA	30045	A	R	YEAR OF BIRTH MISSING
GWINNETT	1891197	BARTON	WALTER	FRANKLIN III		BUFORD	GA	30519	A	R	YEAR OF BIRTH MISSING
GWINNETT	1962642	GANE	MICHAEL	TIMOTHY		DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	2014236	KIM	BOK	SOON		PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	2027976	LORD	GERALDINE	CHEWNING		SNELLVILLE	GA	30078	A	R	YEAR OF BIRTH MISSING
GWINNETT	2106316	SMITH	STEPHEN	JAY		LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	2127171	TYER	NANCY	WATKINS		SNELLVILLE	GA	30078	A	R	YEAR OF BIRTH MISSING
GWINNETT	2724429	BECKWORTH	ARDITH	KAY		LILBURN	GA	30047	A	R	YEAR OF BIRTH MISSING
GWINNETT	2724741	HAY	HELEN	R		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	2728955	DAWSON	DONALD	WILLIAM		LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	2729882	PIRKLE	CHARLES	MURPHY		SUGAR HILL	GA	30518	A	R	YEAR OF BIRTH MISSING
GWINNETT	2732132	CHEEK	GAIL			PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	2740673	COX	WILLIAM	J	JR	BUFORD	GA	30518	A	R	YEAR OF BIRTH MISSING
GWINNETT	2744995	GOODWIN	JUDY	VAN		LILBURN	GA	30047	A	R	YEAR OF BIRTH MISSING
GWINNETT	2748867	GLASS	RONALD	A		NORCROSS	GA	30071	A	R	YEAR OF BIRTH MISSING
GWINNETT	2752228	GUDELANIS	DOREEN	COPPOLA		LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	2757704	TIPPENS	THERESA	W		PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	2758379	TIPPENS	JOE	FRANK		PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	2761169	PARKER	KATHY	J		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	2764032	GLASS	NANETTE	E		NORCROSS	GA	30071	A	R	YEAR OF BIRTH MISSING
GWINNETT	2764366	WAID	MELANIE	ROSE		DULUTH	GA	30097	A	R	YEAR OF BIRTH MISSING
GWINNETT	2772326	TOLAR	JOHN	ERNEST		SNELLVILLE	GA	30078	A	R	YEAR OF BIRTH MISSING
GWINNETT	2772556	CASH	BONNIE	S		PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	2773427	BAUSCH	VICKIE	JOINER		DULUTH	GA	30097	A	R	YEAR OF BIRTH MISSING
GWINNETT	2781406	ILER	LOUISE			LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	2786196	WIGLEY	MARY	W		BUFORD	GA	30519	A	R	YEAR OF BIRTH MISSING
GWINNETT	2791669	WHITE	DANNY			LAWRENCEVILLE	GA	30046	A	R	YEAR OF BIRTH MISSING
GWINNETT	2800883	CASEY	MAUREEN	ELIZABETH		SNELLVILLE	GA	30078	A	R	YEAR OF BIRTH MISSING
GWINNETT	2800950	NOAH	JOHN			LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	2806723	FALKLER	BRENDA	ANN		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	2813197	DAVIS	MARK	W		LILBURN	GA	30047	A	R	YEAR OF BIRTH MISSING
GWINNETT	2821585	GILBERT	WILLIAM	L		DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	2834999	TURNER	BETTY	JONES		LAWRENCEVILLE	GA	30046	A	R	YEAR OF BIRTH MISSING
GWINNETT	2851378	BRAMSTEDT	JENNIFER	LYNN		SNELLVILLE	GA	30078	A	R	YEAR OF BIRTH MISSING
GWINNETT	2856986	GRESHAM	OLETHA			LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	2861816	SEARLES	GLENN	VERNON		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING

GWINNETT	2861817	SEARLES	MARYANN			LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	2864797	MCDONELL	WINSTON	GARY	JR	LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	2868337	FELDMAN	PATRICIA	ANN		SNELLVILLE	GA	30078	A	R	YEAR OF BIRTH MISSING
GWINNETT	2875262	WARD	JOHN	R	JR	BERKELEY LAKE	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	2888968	EZENWEKWE	SHIRELLE	YVETTE		LILBURN	GA	30047	A	R	YEAR OF BIRTH MISSING
GWINNETT	2889379	HALL	CLYDE	R		NORCROSS	GA	30071	A	R	YEAR OF BIRTH MISSING
GWINNETT	2900321	OKOLO	GEORGE	P		LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	2905965	JANSMA	COLLEEN	J		SNELLVILLE	GA	30078	A	R	YEAR OF BIRTH MISSING
GWINNETT	2912786	WALDROP	MATELYN	DENISE		LOGANVILLE	GA	30052	A	R	YEAR OF BIRTH MISSING
GWINNETT	2986869	WALLS	FRANCES	MITCHELL		NORCROSS	GA	30071	A	R	YEAR OF BIRTH MISSING
GWINNETT	2989951	HUNTER	TERESA	D		LAWRENCEVILLE	GA	30046	A	R	YEAR OF BIRTH MISSING
GWINNETT	2992445	CASEY	ALAN	MATTHEW		SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	3188324	ASHTIANI	JAVAD	M		PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	3358281	FAULKNER	TODD	CHRISTOPHER		BUFORD	GA	30519	A	R	YEAR OF BIRTH MISSING
GWINNETT	3375487	JACKSON	TYESE	YVONNE		NORCROSS	GA	30093	A	R	YEAR OF BIRTH MISSING
GWINNETT	3394604	HEILAND	LENETTA	CLINE		SUGAR HILL	GA	30518	A	R	YEAR OF BIRTH MISSING
GWINNETT	3415928	DIAMOND	LATASHA	QUINETTE		NORCROSS	GA	30093	A	R	YEAR OF BIRTH MISSING
GWINNETT	3505226	MICHELSSEN	KEITH	CHARLES		LOGANVILLE	GA	30052	A	R	YEAR OF BIRTH MISSING
GWINNETT	3692369	PEELER	JOHN		JR	LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	3737911	DAINO	KIMBERLY	A		SNELLVILLE	GA	30078	A	R	YEAR OF BIRTH MISSING
GWINNETT	3791204	WEATHERS	JAMES	LEE		DACULA	GA	30019	A	R	YEAR OF BIRTH MISSING
GWINNETT	3796799	ZHANG	PEI	HUA		DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	3838946	PARKER	KURT	LEROY		DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	3886570	DARR	KATHY	WEAVER		PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	3991225	WHITE	TRACIE	RENA		SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	4013123	HECTOR	TIFFANY	XERONA		DACULA	GA	30019	A	R	YEAR OF BIRTH MISSING
GWINNETT	4090211	MCDONELL	PATRICIA	ANN		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	4289847	HOBBS	TRINA	M		SNELLVILLE	GA	30078	A	R	YEAR OF BIRTH MISSING
GWINNETT	4460905	KUCHVALEK	KAREN	SUE		SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	4568801	GRAVITT	SHIRLEY			DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	4574056	WOLTHOFF	FREDERICK	A	III	SNELLVILLE	GA	30078	A	R	YEAR OF BIRTH MISSING
GWINNETT	4680526	NGHIEM	SON	NGOC		DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	4724062	CARR	MALVIN	ORLANDA		LAWRENCEVILLE	GA	30045	A	R	YEAR OF BIRTH MISSING
GWINNETT	4735168	ADAMS	JOHN	G		LAWRENCEVILLE	GA	30045	A	R	YEAR OF BIRTH MISSING
GWINNETT	4799741	BUHLER	ASHLEIGH	HILL		DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	4804004	HARRIS	EVANGELINE			BUFORD	GA	30518	A	R	YEAR OF BIRTH MISSING
GWINNETT	4857749	SAMLAL	PAMELA			LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	4941649	BEAVER	BRETT	DAMON		SUGAR HILL	GA	30518	A	R	YEAR OF BIRTH MISSING
GWINNETT	5016093	JONES	JOSEPH		JR	DACULA	GA	30019	A	R	YEAR OF BIRTH MISSING
GWINNETT	5042451	REINOLD	PATRICIA	CLARKE		DULUTH	GA	30097	A	R	YEAR OF BIRTH MISSING
GWINNETT	5101060	HARPER-SMITH	ANN	VANILLAVEE		BUFORD	GA	30519	A	R	YEAR OF BIRTH MISSING
GWINNETT	5106061	MCCALL	CHARLES	M	JR	DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	5116033	DAVIS-BAILEY	BELINDA			LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING

GWINNETT	5211606	GEORGE	GREGORY			NORCROSS	GA	30071	A	R	YEAR OF BIRTH MISSING
GWINNETT	5257358	ROBINSON	TARI	KRISTINE		LOGANVILLE	GA	30052	A	R	YEAR OF BIRTH MISSING
GWINNETT	5285639	SPEED	BETHELENA	R		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	5404270	DURDEN	MATTHEW			SUGAR HILL	GA	30518	A	R	YEAR OF BIRTH MISSING
GWINNETT	5545405	WAGNER	SHARON	LYNN		BUFORD	GA	30519	A	R	YEAR OF BIRTH MISSING
GWINNETT	5581743	CHANDRA	DINESH			LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	5610103	TOWN	IRENE	MARY		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	5610799	ABRAHAM	JESIN	SARAH		LILBURN	GA	30047	A	R	YEAR OF BIRTH MISSING
GWINNETT	5616769	FORD	JOY	B		DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	5621271	PRUDENCIO	EVA	BOMBON		DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	5621295	PRUDENCIO	EDGARDO	JUAN		DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	5674152	LE	HOANG	X		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	5847552	ATTIA	SAMIR	JOSEPH		LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	5849290	ORBE	FABIAN	ENRIQUE		LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	5877494	TRAN	KHOA ANH			LAWRENCEVILLE	GA	30045	A	R	YEAR OF BIRTH MISSING
GWINNETT	5902195	MAMMEN	MATHEW			LILBURN	GA	30047	A	R	YEAR OF BIRTH MISSING
GWINNETT	5946449	MAI	THUY	THANH		LAWRENCEVILLE	GA	30045	A	R	YEAR OF BIRTH MISSING
GWINNETT	5987933	HUYNH	THAO	DINH		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	6000747	DICKS	EMMA	GENE		SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	6016095	GRIDER	RONALD	LOUIS		PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	6027328	XU	ALLAN			SUGAR HILL	GA	30518	A	R	YEAR OF BIRTH MISSING
GWINNETT	6058087	NGUYEN	HONG	THI		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	6058208	PARVIN	ANDREW	HERBERT		NORCROSS	GA	30071	A	R	YEAR OF BIRTH MISSING
GWINNETT	6063712	GUDE	TERENCE	MARCELLUS		LAWRENCEVILLE	GA	30045	A	R	YEAR OF BIRTH MISSING
GWINNETT	6107724	WEST	RHONDA	DURRENCE		DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	6183416	LATCHMAN	NARESH			SNELLVILLE	GA	30078	A	R	YEAR OF BIRTH MISSING
GWINNETT	6212896	DAUPHIN	LESLEY	D	SR	LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	6309847	SEALS	LESTER			DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	6347277	LE	QUANG	PHAT		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	6377900	DOAN	CARAVAN HAI			DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	6378799	MANZOOR	NAUSHABA			SNELLVILLE	GA	30078	A	R	YEAR OF BIRTH MISSING
GWINNETT	6426724	SHABAZZ	DAWAN	ALI		LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	6463866	ROARK	THRESA	JOYCE		SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	6709548	MCINTYRE	MYRTLE	C JONES		LILBURN	GA	30047	A	R	YEAR OF BIRTH MISSING
GWINNETT	6714764	CLINE	ELIZABETH	CAROL		SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	6724497	DETWILLER	TEE	LA JEAN		LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	6727633	MELO	MARCOS	HENRY		LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	6783281	MARKIEWICZ	SUNG	YE		BUFORD	GA	30519	A	R	YEAR OF BIRTH MISSING
GWINNETT	6817198	LEAZER	LINDA	LEE		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	6817308	LU	AI			SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	6831155	BARRIE	SALAMATU			LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	6917446	AGUIRRE	MARTIN	RAMIRO		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	6917917	PARKER	DOUGLAS	THOMAS		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING

GWINNETT	6922694	ANANTHARAMAN	SEKHAR			DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	6924282	LE	CHINH	CONG		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	6929401	CREECY	JOHN			SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	6933720	ULLAH	MOHAMM	RAFIQUE		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	6969349	DOUGLAS	EARLINE			ATLANTA	GA	30340	A	R	YEAR OF BIRTH MISSING
GWINNETT	7040156	TRAN	THIEN	TUONG THI		LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	7042092	HOOKS	JOSEPH	SCOTT		LILBURN	GA	30047	A	R	YEAR OF BIRTH MISSING
GWINNETT	7045648	EZEDI	IKEMEFUNI		SR	SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	7090114	GREEN	NOAH	ANSLEY		BUFORD	GA	30519	A	R	YEAR OF BIRTH MISSING
GWINNETT	7172243	AHMAD	MADIHA			LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	7218695	MA	SHANG YUNG			DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	7349271	MOSLEY	MARJORIE	B		LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	7351096	SMITH	LUKE	M		LAWRENCEVILLE	GA	30045	A	R	YEAR OF BIRTH MISSING
GWINNETT	7361840	HAVERTY	SHEILA	JANE		LAWRENCEVILLE	GA	30046	A	R	YEAR OF BIRTH MISSING
GWINNETT	7366260	MENDEZ-NEGRON	MAGALY	IVETTE		BUFORD	GA	30519	A	R	YEAR OF BIRTH MISSING
GWINNETT	7379522	LONDON	MARLA	WOODS		LILBURN	GA	30047	A	R	YEAR OF BIRTH MISSING
GWINNETT	7382457	SARUMI	NICOLE	SHERI LOUISE		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	7405477	FULLER	RIPTON	GEORGE		BUFORD	GA	30519	A	R	YEAR OF BIRTH MISSING
GWINNETT	7478495	BUSH	JUSTIN			LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	7530198	KING	LUPU GINA	GBASSAGEE		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	7674928	MASLANEY	ANALISA	D		PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	7694867	BARRETT	ONEIL	SEBASTIAN		LAWRENCEVILLE	GA	30045	A	R	YEAR OF BIRTH MISSING
GWINNETT	7776408	KING	TOMMY	L		LOGANVILLE	GA	30052	A	R	YEAR OF BIRTH MISSING
GWINNETT	7811443	AJMERI	AKBARBHA	A		DULUTH	GA	30097	A	R	YEAR OF BIRTH MISSING
GWINNETT	7813381	ANANTHARAMAN	MOHANA			DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	7856969	OLADEBO	BRODRICK	OGUNSINA		LAWRENCEVILLE	GA	30045	A	R	YEAR OF BIRTH MISSING
GWINNETT	7858223	PACE	DEXTER	NATHANIEL		BUFORD	GA	30518	A	R	YEAR OF BIRTH MISSING
GWINNETT	7867554	BURNS-CURTIS	LAICINDIA	R		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	7936547	DIMAIO	PAMELA	GALEY		BUFORD	GA	30519	A	R	YEAR OF BIRTH MISSING
GWINNETT	7936550	DIMAIO	RICHARD			BUFORD	GA	30519	A	R	YEAR OF BIRTH MISSING
GWINNETT	7948268	SERRANO MORENO	LUIS	NORBERTO		BUFORD	GA	30519	A	R	YEAR OF BIRTH MISSING
GWINNETT	8006990	HUBBARD	CANDYCE	AYANA		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	8009713	PHAN	KHUONG	LE		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	8032606	YOUNG	ANDREA	LAUREN		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	8044336	WALKER	TONY	TERRELL		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	8046525	GREEN	LAVERNE			BUFORD	GA	30519	A	R	YEAR OF BIRTH MISSING
GWINNETT	8106062	HABEEB ULLAH	RUKHSANA			PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	8133335	HABEEBULLAH	MOHAMMAD			PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	8166629	MCCONNELL	THOMAS	SCOTT	JR	SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	8212824	AVEJA	JOSE	ALFREDO		LAWRENCEVILLE	GA	30045	A	R	YEAR OF BIRTH MISSING
GWINNETT	8277351	MCCULLOUGH	DAVID	WILLIAM		GRAYSON	GA	30017	A	R	YEAR OF BIRTH MISSING
GWINNETT	8298723	VU	LYNN			LAWRENCEVILLE	GA	30046	A	R	YEAR OF BIRTH MISSING
GWINNETT	8316229	MUHAMMAD	TAQI	HASAN		SNELLVILLE	GA	30078	A	R	YEAR OF BIRTH MISSING

GWINNETT	8409044	LAIDI	TAHAR			SNELLVILLE	GA	30078	A	R	YEAR OF BIRTH MISSING
GWINNETT	8444535	CAMACHO	LISSETTE	ROSEMARIE KAREN		BERKELEY LAKE	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	8476880	DIXON	LINDA	MAY		BUFORD	GA	30519	A	R	YEAR OF BIRTH MISSING
GWINNETT	8485699	RANDALL	MONYA	HOWARD		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	8570235	VU	THANH	H		DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	8581979	LEE	SU	SUN		SUGAR HILL	GA	30518	A	R	YEAR OF BIRTH MISSING
GWINNETT	8732206	NEWTON	YOLANDA	S		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	8752622	KALLON	FATMATA			DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	8778410	COLE	LINDA	SMITH		PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	8778886	COLE	DENNIS	DALE		PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	8795143	DAVIS	MERCELLA	M		SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	8872356	KELLEY-ROSS	FILINDA	L		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	8883656	RAHMAN	POPPY			LAWRENCEVILLE	GA	30046	A	R	YEAR OF BIRTH MISSING
GWINNETT	8908765	TAYLOR	GLYNNIS	MARIE		DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	10024343	SIMS	VICTOR	BRANDON		DULUTH	GA	30097	A	R	YEAR OF BIRTH MISSING
GWINNETT	10024676	JAMES	HAROLD	RAY		BUFORD	GA	30518	A	R	YEAR OF BIRTH MISSING
GWINNETT	10025933	JAIN	KAILASH			NORCROSS	GA	30071	A	R	YEAR OF BIRTH MISSING
GWINNETT	10066685	PIERCE	TIMOTHY	JUSTIN		NORCROSS	GA	30071	A	R	YEAR OF BIRTH MISSING
GWINNETT	10090324	RAJ	RANJAN			PEACHTREE	GA	30097	A	R	YEAR OF BIRTH MISSING
GWINNETT	10093193	MASHER	AMITA	SURESH		SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	10105660	BITEW	TADDELE	G		NORCROSS	GA	30093	A	R	YEAR OF BIRTH MISSING
GWINNETT	10143486	CANIZO-VALDES	MIGUEL E			LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	10209536	DHRUV	KISHORCHANDRA			LILBURN	GA	30047	A	R	YEAR OF BIRTH MISSING
GWINNETT	10213834	ROMAGE	HEATHER	LEIGH		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	10225730	NGUYEN	NGUYET	M		DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	10255546	GOLDBERG	HAYLEY			PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	10263898	VAN BEVERHOUDT	ALYSIA	GENEVA		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	10348130	YOMANS	MANLY	BERNARD		LOGANVILLE	GA	30052	A	R	YEAR OF BIRTH MISSING
GWINNETT	10404825	SOLANO	MARILYN			PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	10409660	PORTER	AUSTIN	KILVINGTON		SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	10421303	QIANG	LIU			PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	10425224	DABIEDATH	AERIELLE	ALLYSSE		LAWRENCEVILLE	GA	30045	A	R	YEAR OF BIRTH MISSING
GWINNETT	10427276	SHERMAN	LINDA	L		DULUTH	GA	30097	A	R	YEAR OF BIRTH MISSING
GWINNETT	10428152	DO	JAE	S		LAWRENCEVILLE	GA	30046	A	R	YEAR OF BIRTH MISSING
GWINNETT	10429921	RICHARDS	ANGELA	ELLEN		LAWRENCEVILLE	GA	30046	A	R	YEAR OF BIRTH MISSING
GWINNETT	10458208	CHAPPELL	JAMES	LAFAYETTE		BUFORD	GA	30519	A	R	YEAR OF BIRTH MISSING
GWINNETT	10459114	RAMNATH	DONNIE	DAVIE PETER		GRAYSON	GA	30017	A	R	YEAR OF BIRTH MISSING
GWINNETT	10461627	RUSSET	NERY			DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	10489823	MORAND	CASSANDR	ROSE		LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	10513904	LIM	CHUL	M		LAWRENCEVILLE	GA	30046	A	R	YEAR OF BIRTH MISSING
GWINNETT	10526515	BURGESS	JEWEL	TOLLIVER		PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	10545376	TORRES	CARLOS	G		DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	10572992	MARTINEZ	MARINA	JESSICA		SUGAR HILL	GA	30518	A	R	YEAR OF BIRTH MISSING

GWINNETT	10579388	BRYAN	BERYL			LAWRENCEVILLE	GA	30046	A	R	YEAR OF BIRTH MISSING
GWINNETT	10638767	MEDINA	ANAYELLY			NORCROSS	GA	30093	A	R	YEAR OF BIRTH MISSING
GWINNETT	10643254	KOO	ANNA	SUN MOY		LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	10673052	PATEL	KALPANA			SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	10697270	RUIZ	RUTH	MERY		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	10698268	MCGARVEY	HO	KYONG		LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	10705467	BONIFAY	RONALD			LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	10708507	HEWETT	MARY	LOUISE		PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	10720614	UMOH	GRACE	EBONG		GRAYSON	GA	30017	A	R	YEAR OF BIRTH MISSING
GWINNETT	10771484	ONUZURIKE	TIMOTHY	ONUNWA		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	10771782	ATEHORTUA	AURELIO			LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	10802898	MC CAIN	GWENDOLYN			DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	10809135	LI	LISHA			NORCROSS	GA	30071	A	R	YEAR OF BIRTH MISSING
GWINNETT	10815576	AKINWEKOMI	COLLINS	DELE		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	10819212	ABRAHAM	AJI	M		LILBURN	GA	30047	A	R	YEAR OF BIRTH MISSING
GWINNETT	10836158	HANG	THU	NGOC		LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	10845945	CAO	CHAU THU	THI		LAWRENCEVILLE	GA	30045	A	R	YEAR OF BIRTH MISSING
GWINNETT	10864463	UNG	JOHNSON			DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	10923606	TYLER	RETHA	A		DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	10935419	LUI	LILLY			NORCROSS	GA	30071	A	R	YEAR OF BIRTH MISSING
GWINNETT	10961187	HAILE	HAILU	W		LAWRENCEVILLE	GA	30045	A	R	YEAR OF BIRTH MISSING
GWINNETT	10962478	KRONFEL CONTRERAS	MARLENE	LILIANA		BUFORD	GA	30519	A	R	YEAR OF BIRTH MISSING
GWINNETT	10965791	ARORA	MANPREET	S		SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	10966693	TEKLESELASSIA	GIRMA	NIGATU		LILBURN	GA	30047	A	R	YEAR OF BIRTH MISSING
GWINNETT	11099834	PAREKH	SONALBEN			SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	11123521	PUELLES	ERIKA	MARGARITA		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	11133278	NUH	SAADIA	AHMED		LAWRENCEVILLE	GA	30046	A	R	YEAR OF BIRTH MISSING
GWINNETT	11154593	MANNING	LARRY	LAMAR		DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	11158455	GOODWIN	BRANDON	DATRELLE		NORCROSS	GA	30071	A	R	YEAR OF BIRTH MISSING
GWINNETT	11166707	BREDU	OSBERTINA			SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	11181872	COMPTON	TRAMAINÉ	LYNETTE		DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	11233674	GUYTON	WILLIE	JUNIOR		LAWRENCEVILLE	GA	30046	A	R	YEAR OF BIRTH MISSING
GWINNETT	11261285	GLOVER	DWIGHT	CORTEZ		LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	11311892	SANDOVAL	MARIA	JESUS EDILIA		GRAYSON	GA	30017	A	R	YEAR OF BIRTH MISSING
GWINNETT	11314545	NABI	MAHMUDUN			DULUTH	GA	30096	A	R	YEAR OF BIRTH MISSING
GWINNETT	11344453	GOH	SUKEY	HAM		SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	11345694	VO	CAM NHUN	THI		LILBURN	GA	30047	A	R	YEAR OF BIRTH MISSING
GWINNETT	11360260	BARRERO	NICOLAS			LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	11369837	ONYENAKA	GLORY	UKACHI		NORCROSS	GA	30093	A	R	YEAR OF BIRTH MISSING
GWINNETT	11424244	DESAI	SANGITA	SHANTILAL		SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING
GWINNETT	11485998	NGUYEN	MINH	CHAU NGOC		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	11528036	LEE	PAMELA	D		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH MISSING
GWINNETT	11598750	BOCANEGRA	SANDRA	PATRICIA		ATLANTA	GA	30340	A	R	YEAR OF BIRTH MISSING

GWINNETT	11646262	MURALI	UMA			PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	11646269	MURALI	CHEDARAMPATTU			PEACHTREE	GA	30092	A	R	YEAR OF BIRTH MISSING
GWINNETT	11678257	ELLINGTON	JULIETTE	BOGAN		LAWRENCEVILLE	GA	30046	A	R	YEAR OF BIRTH MISSING
GWINNETT	11716429	FERNANDEZ	MARITA			BUFORD	GA	30519	A	R	YEAR OF BIRTH MISSING
GWINNETT	11730430	KAUFMAN	FREDERICK			DULUTH	GA	30097	A	R	YEAR OF BIRTH MISSING
GWINNETT	11760787	COLBERT	COREY	LYNN	JR	LAWRENCEVILLE	GA	30046	A	R	YEAR OF BIRTH MISSING
GWINNETT	11764192	HIDALGO	LEOPOLDO			GRAYSON	GA	30017	A	R	YEAR OF BIRTH MISSING
GWINNETT	11928689	BECKMANN	JEAN	A		LAWRENCEVILLE	GA	30043	A	R	YEAR OF BIRTH MISSING
GWINNETT	11943403	MATHEW	MAMMEN			LILBURN	GA	30047	A	R	YEAR OF BIRTH MISSING
GWINNETT	2777797	MCGINLEY	DONNA	MAKHOLM		SUWANEE	GA	30024	A	R	YEAR OF BIRTH MISSING, SIG MISSING
GWINNETT	2401196	DEPALMA	CHERYL	ANN		SUGAR HILL	GA	30518	A	R	YEAR OF BIRTH NOT A MATCH
GWINNETT	3915258	CLEMONS	YOLANDA	DIANE		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH NOT A MATCH
GWINNETT	4154120	STOLTZ	CINDY	E		LAWRENCEVILLE	GA	30044	A	R	YEAR OF BIRTH NOT A MATCH
GWINNETT	6225498	LE	BON	V		DULUTH	GA	30096	A	R	YEAR OF BIRTH NOT A MATCH
GWINNETT	7739435	BASTIEN	MARIE	M		SUWANEE	GA	30024	A	R	YEAR OF BIRTH NOT A MATCH
GWINNETT	7890439	MADDOX	AYU	WULAN TJOKRO		DULUTH	GA	30096	A	R	YEAR OF BIRTH NOT A MATCH
GWINNETT	1248428	COPELAND	VERA	A		SUWANEE	GA	30024	A	R	YOB AND RES ADDR MISSING
GWINNETT	10621365	ALFORD	RANDREZ	VATORIUS		SUWANEE	GA	30024	A	R	YOB AND RES ADDR MISSING
GWINNETT	1353696	SIKES	LIZZIE	JANE		DULUTH	GA	30096	A	R	YOB AND SIG MISSING
GWINNETT	2408904	KIMBRO	CAROLYN	WAKEFIELD		DULUTH	GA	30096	A	R	YOB AND SIG MISSING
GWINNETT	10493248	MOSES	OMAR	ANTHONY		BUFORD	GA	30519	A	R	YOB AND SIG MISSING
GWINNETT	5630132	WU	MEILING			SUWANEE	GA	30024	A	R	YOB AND SIG NOT A MATCH
GWINNETT	1102920	BRINDELL	ALEC	BRUCE		LOGANVILLE	GA	30052	A	R	YOB NOT A MATCH
GWINNETT	2098945	SHIRLEY	JOHN	MARION		SUWANEE	GA	30024	A	R	YOB NOT A MATCH
GWINNETT	2642189	ALLAN	OCTAVIA	NORTH		PEACHTREE	GA	30092	A	R	YOB NOT A MATCH
GWINNETT	2767009	BARANOWSKI	RUTH	T		LAWRENCEVILLE	GA	30044	A	R	YOB NOT A MATCH
GWINNETT	2869958	DIRKSEN	PATRICIA	LYNN		SNELLVILLE	GA	30078	A	R	YOB NOT A MATCH
GWINNETT	2883990	INGRAM	BEVERLY	ANN		SUGAR HILL	GA	30518	A	R	YOB NOT A MATCH
GWINNETT	3836664	HENN	MARILYN	JEAN		LAWRENCEVILLE	GA	30043	A	R	YOB NOT A MATCH
GWINNETT	3887933	KHAN	FAZAL	ZAMAN		SUWANEE	GA	30024	A	R	YOB NOT A MATCH
GWINNETT	5165015	MINOR	JANICE	LORRAINE		LAWRENCEVILLE	GA	30044	A	R	YOB NOT A MATCH
GWINNETT	5491194	LOPEZ	SAMUEL			DULUTH	GA	30096	A	R	YOB NOT A MATCH
GWINNETT	5868710	LOGAN	JOANN	MATTHEWS		LAWRENCEVILLE	GA	30044	A	R	YOB NOT A MATCH
GWINNETT	6174969	TOWNS	TERESA	DELORES		DULUTH	GA	30096	A	R	YOB NOT A MATCH
GWINNETT	6229920	DE LA ROSA-JERMAM	ALEJITA			LAWRENCEVILLE	GA	30046	A	R	YOB NOT A MATCH
GWINNETT	6930035	HARRISON	JUNIOR	STEVE		BUFORD	GA	30518	A	R	YOB NOT A MATCH
GWINNETT	7424108	BUGGS	MARSAY	MERCEL		LAWRENCEVILLE	GA	30043	A	R	YOB NOT A MATCH
GWINNETT	7832781	CAREY	JANAE	CAREY		NORCROSS	GA	30071	A	R	YOB NOT A MATCH
GWINNETT	7864260	WILBANKS	JANET	ELAINE		LAWRENCEVILLE	GA	30046	A	R	YOB NOT A MATCH
GWINNETT	8473845	HINSON	RAVEN	NICOLE		PEACHTREE	GA	30096	A	R	YOB NOT A MATCH
GWINNETT	8570759	LEE	SOON	OK		SUWANEE	GA	30024	A	R	YOB NOT A MATCH
GWINNETT	8817841	WIDEMAN	KEITH			NORCROSS	GA	30071	A	R	YOB NOT A MATCH
GWINNETT	10040649	SEBRANEK	MICHAEL	S		SUWANEE	GA	30024	A	R	YOB NOT A MATCH

GWINNETT	10092544	DZAKUMA	MARY	HYACINTHA	LILBURN	GA	30047	A	R	YOB NOT A MATCH
GWINNETT	10469065	THORNBERRY	JESSICA	CLARK	LAWRENCEVILLE	GA	30043	A	R	YOB NOT A MATCH
GWINNETT	10513815	YANG	JACOB	HYUN-KI	SUGAR HILL	GA	30518	A	R	YOB NOT A MATCH
GWINNETT	10570370	MOORE	CHRISTOPHER		BUFORD	GA	30519	A	R	YOB NOT A MATCH
GWINNETT	10627276	EYNISFELD	ANNA		PEACHTREE	GA	30092	A	R	YOB NOT A MATCH
GWINNETT	10705347	CHANG	KUO TAI		SUWANEE	GA	30024	A	R	YOB NOT A MATCH
GWINNETT	11245083	HUYNH	LAN	BUU	LAWRENCEVILLE	GA	30044	A	R	YOB NOT A MATCH
GWINNETT	11962431	ALLAN	MACKENZI	TYLER	PEACHTREE	GA	30092	A	R	YOB NOT A MATCH
GWINNETT	2916154	DAVIES	CLAUDIUS	LIONEL ABIOSE	GRAYSON	GA	30017	A	R	
GWINNETT	8316554	PHILLIPS	BARRY	ANTHONY	LAWRENCEVILLE	GA	30044	A	R	

RETRIEVED FROM DEMOCRACYDOCKET.COM

EXHIBIT C

RETRIEVED FROM DEMOCRACYDOCKET.COM

County	sosid	Last Name	First Name	Middle Name	mailing_street_number	Mailing Street Name	Mailing Apt/Unit	Mailing City	Mailing State	Mailing Zip Code	Application Status	Ballot Status	Status Reason	Application Date	Ballot Issued Date	Ballot Return Date	Ballot Style	Ballot Assisted	Challenged	Provisional	ID Required	Municipal Precinct	County Precinct	CNG	SEN	HOUSE	JUD	Combo	Vote Center ID	Ballot ID	Post	Party		
FORSYTH	10676923	PARKS	WILLIAM	ANDREW	169	OAK GROVE RD	(null)	PINE MOUNTAIN	GA	31822	A	R	Ballot Not Returned By Election Day	10/31/2018	10/31/2018	11/8/2018	MAILED	NO	NO	NO	NO	(null)		25	7	27	26	BELL	317	(null)	197	42881	(null)	
FORSYTH	11540049	PANETTA	SYDNEY	(null)	515	BAXTER ST	(null)	ATHENS	GA	30602	A	R	Ballot Not Returned By Election Day	10/23/2018	10/23/2018	11/7/2018	MAILED	NO	NO	NO	NO	(null)		10	7	27	24	BELL	309	(null)	226	14438	(null)	
FORSYTH	8097037	VIANI	ADDISON	LEIGH	(null)	PO BOX 2491	(null)	HIGHLANDS	NC	28741	A	R	Ballot Not Returned By Election Day	10/30/2018	10/30/2018	11/7/2018	MAILED	NO	NO	NO	NO	(null)		1	7	27	25	BELL	308	(null)	725	34463	(null)	
FORSYTH	11123868	LIU	JIANQ	CHUEN	7675	SETTLES WALK LN	(null)	SUWANEE	GA	30024	A	R	Ballot Not Returned By Election Day	10/19/2018	10/19/2018	11/8/2018	MAILED	NO	NO	NO	NO	(null)		19	7	27	25	BELL	308	(null)	330	10672	(null)	
FORSYTH	10343175	HEARD	ELIZABETH	JANE	600	HEYWARD ST	APT 131	COLUMBIA	SC	29201	A	R	Ballot Not Returned By Election Day	10/23/2018	10/23/2018	11/7/2018	MAILED	NO	NO	NO	NO	(null)		8	7	27	26	BELL	317	(null)	220	14938	(null)	
FORSYTH	10821198	BOS	TYLER	JOHN	836	THOMPSON LN	SUITE 2J	MURFREESBORO	TN	37129	A	R	Ballot Not Returned By Election Day	10/16/2018	10/16/2018	11/7/2018	MAILED	NO	NO	NO	NO	(null)		10	7	27	22	BELL	310	(null)	68	5210	(null)	
FORSYTH	11589767	VEERAPANENI	LAKSHMI	CHARITA	2301	VANDERBILT PLACE	PMB 352590	NASHVILLE	TN	37235	A	R	Ballot Not Returned By Election Day	11/1/2018	11/1/2018	11/7/2018	MAILED	NO	NO	NO	NO	(null)		21	7	27	25	BELL	319	(null)	185	44877	(null)	
FORSYTH	7918692	RAHIM	TAYEB	AHMAD	125	POINT PLACE	(null)	AUGUSTA	GA	30907	A	R	Ballot Not Returned By Election Day	10/29/2018	10/29/2018	11/7/2018	MAILED	NO	NO	NO	NO	(null)		1	7	27	25	BELL	308	(null)	713	30695	(null)	
FORSYTH	10652538	LAKIC	TAMARA	(null)	2420	LEXINGTON LN	(null)	CUMMING	GA	30040	A	R	Ballot Not Returned By Election Day	10/8/2018	10/8/2018	11/8/2018	MAILED	NO	NO	NO	NO	(null)		29	7	27	25	BELL	311	(null)	45	2854	(null)	
FORSYTH	8159598	DONG	ASHLEY	JIN	1000	S CLARK ST	(null)	CHICAGO	IL	60605	A	R	Ballot Not Returned By Election Day	10/9/2018	10/9/2018	11/7/2018	MAILED	NO	NO	NO	NO	(null)		29	7	27	25	BELL	311	(null)	46	2963	(null)	
FORSYTH	10503947	TURNER	OLIVIA	JOAN	401	18TH ST E	(null)	TUSCALOOSA	GA	35401	A	R	Ballot Not Returned By Election Day	10/31/2018	10/31/2018	11/7/2018	MAILED	NO	NO	NO	NO	(null)		1	7	27	25	BELL	308	(null)	731	39080	(null)	
FORSYTH	10858352	LIPINSKI	JESSICA	JANE	8470	AVALON CT	(null)	CUMMING	GA	30041	A	R	Ballot Not Returned By Election Day	9/27/2018	9/27/2018	11/7/2018	MAILED	NO	NO	NO	NO	(null)		25	7	27	25	BELL	319	(null)	17	1964	(null)	
FORSYTH	7912666	FRIDAY	LAUREN	CHRISTEN	232	EAST 11TH ST	APT 252	CHATTANOOGA	TN	37402	A	R	Ballot Not Returned By Election Day	10/17/2018	10/17/2018	11/7/2018	MAILED	NO	NO	NO	NO	(null)		10	7	27	24	BELL	302	(null)	144	7331	(null)	
FORSYTH	8077549	GLOR	STEPHEN	GERARD	3825	OVERLAKE DR	(null)	CUMMING	GA	30041-2843	A	R	Ballot Not Returned By Election Day	10/29/2018	10/29/2018	11/7/2018	MAILED	NO	NO	NO	NO	(null)		8	7	27	26	BELL	317	(null)	241	30878	(null)	
FORSYTH	10202534	BAILEY	MONICA	NICOLE	2610	DEFOORS FERRY RD NW	(null)	ATLANTA	GA	30318	A	R	Ballot Not Returned By Election Day	10/31/2018	10/31/2018	11/7/2018	MAILED	NO	NO	NO	NO	(null)		8	7	27	25	BELL	319	(null)	51	42680	(null)	
FORSYTH	7305354	RAMIREZ	GUILLERMO	MARIO	3820	RILANDITE CV	(null)	CUMMING	GA	30040	A	R	Ballot Not Returned By Election Day	10/9/2018	10/9/2018	11/7/2018	MAILED	NO	NO	NO	NO	(null)		10	7	27	24	BELL	302	(null)	108	3036	(null)	
FORSYTH	7459624	ZIGTEMA	THOMAS	HENRY	2620	FLINT CREEK DR	(null)	CUMMING	GA	30041	A	R	Ballot Not Returned By Election Day	10/18/2018	10/18/2018	11/7/2018	MAILED	NO	NO	NO	NO	(null)		1	7	27	25	BELL	308	(null)	586	8526	(null)	
FORSYTH	8256022	DUMENIL	MORGAN	BROOKS	660	RALPH MCGILL BLVD	APT 4305	ATLANTA	GA	30312-6861	A	R	Ballot Not Returned By Election Day	11/2/2018	11/2/2018	11/8/2018	MAILED	NO	NO	NO	NO	(null)		21	7	27	25	BELL	319	(null)	187	52251	(null)	
FORSYTH	8670466	WIDJAJA	COURTNEY	YUNG	7115	SNOWDEN CREST	(null)	SAN ANTONIO	TX	78240	A	R	Ballot Not Returned By Election Day	11/1/2018	11/1/2018	11/7/2018	MAILED	NO	NO	NO	NO	(null)		21	7	27	25	BELL	308	(null)	330	47494	(null)	
FORSYTH	11613583	MISTRY	NICOLE	ASHLEY	1055	S LUMPKIN ST	(null)	MYERS HALL RM	GA	30609	A	R	Ballot Not Returned By Election Day	10/10/2018	10/10/2018	11/7/2018	MAILED	NO	NO	NO	NO	(null)		21	7	27	25	BELL	319	(null)	121	3195	(null)	
FORSYTH	10785266	CASTELEIN	LUCAS	EVERT	1900	BELMONT BLVD	RM 120	TALLHAL	NASHVILLE	TN	37212	A	R	Ballot Not Returned By Election Day	10/20/2018	10/22/2018	11/8/2018	MAILED	NO	NO	NO	NO	(null)		29	7	27	24	BELL	309	(null)	177	12296	(null)
FORSYTH	10395712	KUEHN	ALYSSA	JOANN	1300	SUMMERVILLE AVE	(null)	COLUMBIA	SC	29201	A	R	Ballot Not Returned By Election Day	10/5/2018	10/8/2018	11/8/2018	MAILED	NO	NO	NO	NO	(null)		1	7	27	25	BELL	308	(null)	406	2723	(null)	
FORSYTH	11956132	BECKER	ANDREW	(null)	1055	S LUMPKIN ST	(null)	ATHENS	GA	30609	A	R	Ballot Not Returned By Election Day	10/11/2018	10/11/2018	11/7/2018	MAILED	NO	NO	NO	NO	(null)		25	7	27	26	BELL	317	(null)	112	3247	(null)	

RETRIEVED FROM DEMOCRACYDOCKET.COM

EXHIBIT D

RETRIEVED FROM DEMOCRACYDOCKET.COM

STOP / Haga una pausa

Have you completed and signed the oath? / ¿Ha completado y firmado el juramento?

Have you placed your ballot in the white envelope and sealed it? / ¿Ha colocado su boleta en el sobre blanco y lo ha sellado?

Have you affixed sufficient postage? / ¿Ha colocado suficiente estampillas?

OATH OF ELECTOR

I, the undersigned, do swear (or affirm) that I am a citizen of the United States and of the State of Georgia; that my residence address, for voting purposes, is as listed below, _____ County, Georgia; that I possess the qualifications of an elector required by the laws of the State of Georgia; that I am entitled to vote in the precinct containing my residence in the primary or election in which this ballot is to be cast; that I am eligible to vote by absentee ballot; that I have not marked or mailed any other absentee ballot, nor will I mark or mail another absentee ballot for voting in such primary or election; nor shall I vote therein in person; and that I have read and understand the instructions accompanying this ballot; and that I have carefully complied with such instructions in completing this ballot. I understand the offer or acceptance of money or any other object of value to vote for any particular candidate, list of candidates, issue, or list of issues included in this election constitutes an act of voter fraud and is a felony under Georgia law O.C.G.A. Section 21-2-384(c), and O.C.G.A. Section 21-2-570.

JURAMENTO DEL ELECTOR

Yo, el abajo firmante, juro (o afirmo) que, soy un ciudadano de los Estados Unidos y del Estado de Georgia; que mi domicilio para efectos de votación es como se muestra en la parte inferior, Condado de _____, Georgia; que cumpla los requisitos de un elector requeridos por las leyes del Estado de Georgia; que tengo derecho a votar en el distrito que comprende mi residencia en la elección primaria o en la elección en que este voto será emitido; que califico para votar mediante boleta de voto ausente; que no he marcado o enviado por correo ninguna otra boleta de voto ausente para votar en dicha elección primaria o en dicha elección y que tampoco votaré en ese lugar en persona; que he leído y entendido las instrucciones que acompañan esta boleta, y que he cumplido cuidadosamente las instrucciones para completarla. Entiendo que la oferta o la aceptación de dinero o cualquier otro objeto de valor para votar por un candidato en particular, lista de candidatos, tema o lista de temas incluidos en esta elección constituye un acto de fraude electoral y es un delito grave bajo la ley de Georgia O.C.G.A. Section 21-2-384(c), y O.C.G.A. Section 21-2-570.

Elector's Residence Address/Dirección de Residencia del Elector

(Street Number/Número de la calle)

(Street Name/Nombre de la calle)

(Apartment/Apartamento)

(City/Ciudad)

(State/Estado)

(Zip Code/Código postal)

Year of Elector's Birth/Año de nacimiento del elector: _____**Sign here/Firme aquí:** _____**(SIGNATURE OR MARK OF ELECTOR/FIRMA O MARCA DEL ELECTOR)****OATH OF PERSON ASSISTING ELECTOR (IF ANY)**

I, the undersigned, do swear (or affirm) that I assisted the above-named elector in marking such elector's absentee ballot as such elector personally communicated such elector's preference to me, and that such elector is entitled to receive assistance in voting under provisions of subsection (a) of Code Section 21-2-409. This, the _____ day of _____, 20____.

SIGNATURE OF PERSON ASSISTING ELECTOR**Relationship to Elector****Reason for assistance (Check appropriate square):**

- ☐ Elector is unable to read the English language.
- ☐ Elector requires assistance due to physical disability.

PENALTIES: Georgia law provides, in subsection (b) of Code Section 21-2-409, that no person shall assist more than ten electors in any primary, election, or runoff in which there is no federal candidate on the ballot. Georgia law further provides that any person who knowingly falsifies information so as to vote illegally by absentee ballot or who illegally gives or receives assistance in voting, as specified in Code Sections 21-2-568, 21-2-573 or 21-2-579 shall be guilty of a felony.

JURAMENTO DE LA PERSONA QUE ASISTE AL ELECTOR (SI CORRESPONDE)

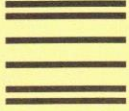
Yo, el abajo firmante, juro (o afirmo) que ayudé al elector antes nombrado a marcar su boleta de voto ausente con la preferencia que me comunicó personalmente ese elector y que dicho elector tiene el derecho de recibir asistencia para votar en virtud de las disposiciones del inciso (a) de la sección 21-2-409 del código. Este, el día _____ de _____ del 20____.

FIRMA DE LA PERSONA QUE ASISTE AL ELECTOR**RELACIÓN CON DICHA PERSONA****Razón para recibir asistencia (Marque la casilla adecuada):**

- ☐ El elector es incapaz de leer el idioma inglés.
- ☐ El elector necesita asistencia debido a una discapacidad física.

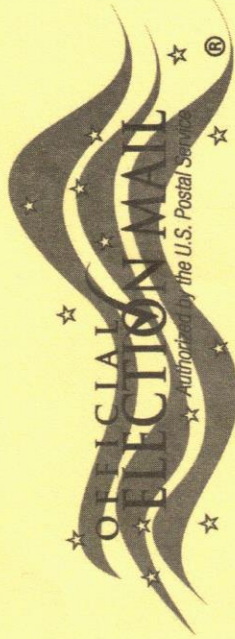
SANCIONES: La ley de Georgia establece en el inciso (b) de la sección 21-2-409 del código que ninguna persona asistirá a más de diez electores en cualquier elección primaria, elección o segunda vuelta en la que no haya ningún candidato federal en la boleta. La ley de Georgia establece que toda persona que falsifique información deliberadamente para votar de manera ilegal mediante boleta de voto ausente o que de manera ilegal dé o reciba asistencia para votar como se especifica en las secciones 21-2-568, 21-2-573 o 21-2-579 del código será culpable de un delito grave.

FROM/DE



Place sufficient
postage here / Coloque
aquí suficiente franqueo

Additional postage
will be required / Se
requerirá un franqueo
adicional



**OFFICIAL ABSENTEE BALLOT / BOLETA OFICIAL DE VOTO AUSENTE
BOARD OF REGISTRARS / JUNTA DE REGISTRADORES**

**75 LANGLEY DRIVE
LAWRENCEVILLE, GA 30046
USA**

RETRIEVED FROM PROCESSION PROCKET.COM

Attachment 1

RETRIEVED FROM DEMOCRACYDOCKET.COM

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RHONDA J. MARTIN, DANA BOWERS,
JASMINE CLARK, SMYTHE DUVAL,
JEANNE DUFORT and THE GEORGIA
COALITION FOR THE PEOPLE'S
AGENDA, INC.,

Plaintiffs,

and

CAROLYN BOURDEAUX and
CAROLYN BOURDEAUX FOR
CONGRESS

Plaintiffs-Intervenors,

v.

BRIAN KEMP, SECRETARY OF STATE
OF GEORGIA; REBECCA N. SULLIVAN,
RALPH F. "RUSTY" SIMPSON, DAVID
J. WORLEY and SETH HARP; STEPHEN
DAY, JOHN MANGANO, ALICE
O'LENICK, BEN SATTERFIELD and
BEAUTY BALDWIN,

Defendants.

Civil Action File No.

1:18-cv-04776 LMM

DECLARATION OF DAVID J. WORLEY

Pursuant to 28 U.S.C. § 1746, I, David J. Worley, declare as follows:

1. I am over the age of 18, have personal knowledge of the facts stated in this declaration, and can competently testify to their truth.

2. I am a U.S. Citizen, and a resident of Georgia. I am currently and have been for almost the past 15 years a member of the Georgia State Election Board (the “Board”). I am a named-defendant, in my official capacity as a member of the Board, in this matter. I am also a named partner in the law firm Evangelista Worley LLC based in Atlanta.

3. The Board is responsible for (1) obtaining uniformity in election practices by promulgating rules and regulations to ensure the legality and integrity of all elections, (2) investigating frauds and irregularities in elections, (3) reporting election law violations to the Attorney General or appropriate district attorney, and (4) considering proposed consent orders resolving complaints referred to the Attorney General as possible violations of the Election Code, including O.C.G.A § 21-2-386. As a member of the Board, I am responsible for participating in Board meetings and, along with my fellow Board members, carrying out the above functions.

4. Prior to each State Election Board meeting, members of the Board are given binders containing information on the cases we are to consider at that meeting, including the agenda, proposed consent orders, and memoranda from the Attorney General regarding proposed consent orders. At each meeting the Board has a Consent Agenda consisting of cases in which the Attorney General has recommended the Board enter into a consent order with the Respondents resolving the case. For each of those cases, the Attorney General provides a memorandum giving the legal basis for his recommendation and the consent order to be approved by the Board, usually signed in advance by the Respondents. Exhibits A, B, and C, attached, are Board materials from the binders presented to me in advance of the specified Board meetings, and retained by me.

5. On a number of occasions, the Georgia Attorney General has advised the Board that “the Georgia Supreme Court has held that while O.C.G.A. § 21-2-386 provides a basis upon which an election official *may* reject an absentee ballot, rejection is not mandatory where a voter has failed to provide all ‘required information.’” *In the Matter of: Eleanor Gale, Elections Supervisor, and McIntosh Cty. Bd. Of Elections & Registration*, SEB Case No. 2012-131 (meeting of March 23, 2016) at 11 (emphasis in original) (citing *Jones v. Jesup*, 279 Ga. 531, 533 n.5 (2005) (attached as Exhibit A hereto). Further, the Attorney General has advised that

“an election official *does not* violate O.C.G.A. § 21-2-386(a)(1)(C) when they accept an absentee ballot despite the omission of a day and month of birth and/or an address, *if* the election official can verify the identity of the voter with the voter’s signature and whatever other information is provided.” *Id.* (emphases in original). Indeed, the Attorney General has advised the State Election Board that federal law “*prohibits* the denial of the right to vote ‘because of an error or omission on any record or paper . . . if such error or omission is not *material* in determining whether such individual is qualified under State law to vote in such election.’” *Id.* at 12 (emphasis in original) (citing 52 U.S.C. §10101). The Board has accepted and acted on the Attorney General’s advice.

6 True and correct copies of Board materials documenting additional examples of instances in which the Attorney General has provided the same advice and the Board has acted in accordance therewith are attached to this Declaration. *See In the Matter of: Burke Cty. Bd. of Election & Registration; Barbara N. Hammett, and Laverne Sello*, SEB Case No. 2011-000095 (meeting of March 23, 2016) at 11 (concluding accepting absentee ballots that were “missing a street address” did not violate Georgia law) (Exhibit B); *In the Matter of Fred Haymons et al.*, SEB Case No. 2012-31 (meeting of September 11, 2018) (dismissing charge for violating

O.C.G.A. § 21-2-386(a)(1)(C) brought against election officials who accepted absentee ballots without all of the requested information in the oath) (Exhibit C).


7. The State Election Board voted to enter into the proposed consent orders in each of three cases referenced above.

I declare under penalty of perjury that the foregoing is true and correct.

RETRIEVED FROM DEMOCRACYDOCKET.COM

Dated: November 11, 2018

Respectfully submitted,



David J. Worley
Peachtree City, Georgia

RETRIEVED FROM DEMOCRACYDOCKET.COM

EXHIBIT A

RETRIEVED FROM DEMOCRACYDOCKET.COM



The Office of Secretary of State

AGENDA
STATE ELECTION BOARD HEARING
Professional Licensing Board
Building B, Exam Room
Macon, Georgia 31217
Wednesday, March 23, 2016 – 10:00 am

I. CALL TO ORDER

Invocation and Pledge of Allegiance

II. APPROVAL OF MINUTES

State Election Board Meeting - October 21, 2015	1
Special Called State Election Board Meeting – December 9, 2015	2

III. PUBLIC COMMENT UNRELATED TO CASES OR OTHER AGENDA ITEMS
 (Please fill out and submit comment card)

IV. INVESTIGATIONS REPORT (R. Lewis, F. Watson and P. Jones presenting)

Consent Cases

SEB Case No. 2012-183	Towns County	3
SEB Case No. 2014-034	Sumter County Precinct Changes	4
SEB Case No. 2014-080	Candler County	5
SEB Case No. 2014-082	Meriwether County	6
SEB Case No. 2014-089	City of Warwick	7
SEB Case No. 2014-097	Laurens County	8
SEB Case No. 2014-101	Cobb County	9
SEB Case No. 2014-103	Chatham County	10
SEB Case No. 2014-105	Houston County	11
SEB Case No. 2015-044	City of Tiger – Rabun County	12
SEB Case No. 2015-045	City of Forest Park	13

V. INVESTIGATIONS REPORT (R. Lewis, F. Watson and P. Jones presenting)

New Cases

SEB Case No. 2012-107	✓ Montgomery County	14
SEB Case No. 2014-021	✓ Montgomery County	15
SEB Case No. 2012-133	✓ Coffee County	16
SEB Case No. 2012-198	✓ Coffee County	17
SEB Case No. 2012-170	✓ Richmond County	18
SEB Case No. 2012-200	✓ Gwinnett County	19
SEB Case No. 2013-005	✓ Randolph County	20
SEB Case No. 2013-040	✓ City of Leslie – Sumter County	21
SEB Case No. 2013-042	✓ City of Keysville – Burke County	22
SEB Case No. 2013-043	✓ City of Willacoochie – Atkinson County	23
SEB Case No. 2013-044	✓ City of Americus – Sumter County	24

SEB Case No. 2013-048	City of Donalsonville – Seminole County	25
SEB Case No. 2013-054	Lumber City – Telfair County	26
SEB Case No. 2013-066	City of Bronwood – Terrell County	27
SEB Case No. 2014-002	Twiggs County	28
SEB Case No. 2014-039	Glynn County	29
SEB Case No. 2014-110	Glynn County	30

VI. EXECUTIVE SESSION AND/OR BREAK

VII. ATTORNEY GENERAL REPORT

Consent Orders and Proposed Dismissals

SEB Case No. 2014-035	John A. Kimbell	31
SEB Case No. 2014-059	Bobby Shane Duck	32
SEB Case No. 2012-131	McIntosh County, Elenore Gale	33
SEB Case No. 2009-061	Rabun County, Tammy Whitmire	34
SEB Case No. 2011-071	Kendra March	35
SEB Case No. 2011-023	Marvin McKenzie	36
SEB Case No. 2010-111	Honorable Debbie Brown	37
SEB Case No. 2012-007	City of Braswell, Helen Waters	38
SEB Case No. 2012-121	William Rainey, Robin Rainey, Dorothy Adams, Karen Schornhorst	39
SEB Case No. 2011-095	Burke County Board of Elections and Registration, Barbara Hammett, Laverne Sello, A. Williams	40
SEB Case No. 2012-122	Donald Jeffrey Eye	41

VIII. ADJOURNMENT

RETRIEVED FROM DEMOCRACYDOCKET.COM

McIntosh County, 2012-131

Respondents: Elenore Gale, Elections Supervisor
McIntosh Board of Elections and Registration

Jurisdiction and Election: McIntosh County, Nov., 2012 General Election

Complainant: Elenore Gale, Election Supervisor

Proposed Resolution: Cease and Desist, Public Reprimand, \$100.00 fine

Summary:

The Board voted to refer this case to the Attorney General's Office at its October 21, 2015 meeting. McIntosh County held a general election on November 6, 2012. In connection with that election, the McIntosh County Board of Elections and Registration and Elenore Gale, the Elections Supervisor, failed to have the ballot clerk sign the bottom of thirty-three absentee ballot envelopes, certifying and approving the ballots. In addition, twelve (12) of these thirty-three (33) ballots also failed to indicate the date received on the bottom of the absentee envelope. All thirty-three (33) ballot envelopes failed to indicate the time of receipt.

O.C.G.A. § 21-2-386(a)(1)(B) requires that the registrar or ballot clerk write the day and hour of receipt on each absentee ballot envelope received, and that they compare the identifying information on each envelope with the information on the elector's file. If the "information and signature appear to be valid and other identifying information appears to be correct," the registrar or ballot clerk must sign the bottom of the ballot certifying and approving the ballot.

Respondents violated O.C.G.A. § 21-2-386(a)(1)(B) when they failed to properly mark the absentee ballot envelopes with the date and time received, and sign the envelope certifying and approving the ballots as set forth above. 12/33

Additionally, Respondents accepted twenty-three absentee ballots that were missing a day and month of birth and/or an address. Six of these twenty-three ballot envelopes included a P.O. Box rather than a street address. These allegations were referred to the Attorney General's Office as a possible violation of O.C.G.A. § 21-2-386(a)(1)(C).

The Georgia Supreme Court has held that while O.C.G.A. § 21-2-386 provides a basis upon which an election official *may* reject an absentee ballot, rejection is not mandatory where a voter has failed to provide all "required information." *Jones v. Jesup*, 279 Ga. 531, 533 n. 5 (2005). In *Jones* the omitted information was the place, day and month of birth. However, nothing in O.C.G.A. § 21-2-386 makes an address more or less required than a day and month of birth, both are used to assist the local election official in confirming the identity of the voter where comparison of the voter's signature is insufficient. Therefore, an election official *does not* violate O.C.G.A. § 21-2-386(a)(1)(C) when they accept an absentee ballot despite the omission

of a day and month of birth and/or an address, *if* the election official can verify the identity of the voter with the voter's signature and whatever other information is provided.

This interpretation of O.C.G.A. § 21-2-386(a)(1)(C) is also consistent with federal law which *prohibits* the denial of the right to vote "because of an error or omission on any record or paper . . . if such error or omission is not *material* in determining whether such individual is qualified under State law to vote in such election." 52 U.S.C. § 10101 (emphasis added). Where the election official can verify the identity of the voter by comparing their signature on the absentee ballot envelope with the voter's signature on file, the omission of the additional information of residence address and/or day and month of birth would not be material to that voter's qualifications and the absentee ballot should be counted.

I recommend that the Board accept the proposed consent order for Respondents.

RETRIEVED FROM DEMOCRACYDOCKET.COM

**BEFORE THE STATE ELECTION BOARD
STATE OF GEORGIA**

In the matter of:

**Elenore Gale, Elections Supervisor, and
McIntosh County Board of Elections
and Registration,**

Respondents.

*
*
*
*
*
*
*
*
*
*

SEB Case 2012-131

CONSENT ORDER

COMES NOW the State Election Board, by and through counsel, and Respondents, Elenore Gale, Elections Supervisor, and McIntosh County Board of Elections and Registration, and hereby enter into the following Consent Order for use in this matter before the State Election Board in lieu of an evidentiary hearing.

FINDINGS OF FACT and CONCLUSIONS OF LAW

The findings of fact set forth in the following Paragraphs 1 through 2 have been asserted against Respondents, the McIntosh County Board of Elections and Registration, and Elenore Gale, the Elections Supervisor. Respondents desire that the above-captioned case be resolved in its entirety in order to avoid further litigation.

1.

During the November, 2012 general election, Respondents accepted thirty three (33) absentee ballots without first writing the time and/or date received on the ballot envelope. This constitutes a violation of O.C.G.A. § 21-2-386(a)(1)(B).

2.

With respect to the thirty-three (33) absentee ballots described in paragraph 1 above, Respondents failed to have the registrar or ballot clerk sign the bottom of the absentee ballot envelope to signify approval of the ballot.

ORDER

1.

This Consent Order addresses and resolves all matters regarding Respondents in connection with SEB case file 2012-131.

2.

The Georgia State Election Board, having considered the particular facts and circumstances of this case, inclusive of the within and forgoing "Findings of Fact and Conclusions of Law" hereby ORDERS that Respondents, McIntosh County Board of Elections and Registration, and Elenore Gale, the Elections Supervisor, cease and desist from further violations of the Election Code, and hereby publicly reprimands Respondents. The State Election Board further ORDERS Respondent to pay a one hundred dollar (\$100.00) civil penalty to the State Election Board within sixty days of acceptance of this Consent Order by the State Election Board.

3.

Respondent has taken remedial measures to ensure compliance with the election code going forward. All employees of Respondent McIntosh County Board of Elections and Registration are now certified. Additionally, two of the five current Board members are also certified.

4.

Respondent, McIntosh County Board of Elections and Registration, acknowledges that the members of the McIntosh County Board of Elections and Registration have read this Consent

Order and understand the contents. Respondent, McIntosh County Board of Elections and Registration, understands that Respondent has a right to a hearing in this matter. Respondent, McIntosh County Board of Elections and Registration, knowingly and voluntarily waives such right to a hearing, as well as any other rights under the Georgia Administrative Procedure Act pertaining to notice and hearing for contested cases, by entering into this Consent Order.

5.

Respondent, Elections Supervisor, Elenore Gale, acknowledges that she has read this Consent Order and understands the contents. Respondent, Elenore Gale, understands that Respondent has a right to a hearing in this matter. Respondent, Elenore Gale, knowingly and voluntarily waives such right to a hearing, as well as any other rights under the Georgia Administrative Procedure Act pertaining to notice and hearing for contested cases, by entering into this Consent Order.

6.

This Consent Order is entered in settlement of disputed matters and the Consent Order entered herein is not to be construed as an admission of guilt or liability on the part of the Respondents but is entered herein to resolve this State Election Board case. Respondents acknowledge that the State Election Board has sufficient evidence to prove the foregoing violations of the state election code and enter into this Consent Order to resolve this case, but Respondents make no further admissions regarding the findings of fact contained herein. Respondents understand that this Consent Order is a civil settlement and has no criminal ramifications, and this Consent Order shall **not** be considered an admission of criminal misconduct.

7.

This Consent Order, inclusive of its Stipulations and Order, shall not become effective unless and until approved by the Georgia State Election Board. If not agreed to, approved by, and executed on behalf of, the Georgia State Election Board, neither stipulation nor any other part of this agreement shall have any binding legal effect whatsoever and shall not constitute an admission against interest or prejudice the ability of either the Board or Respondents to adjudicate this matter.

This 1st day of February, 2016.

Sworn to and subscribed
before me this 1 day
of February, 2016

CONSENTED TO:

Debra Bain
NOTARY PUBLIC



Elenore Gale
ELENORE GALE
Elections Supervisor

Robert Mucha
Robert Mucha
Chairperson, McIntosh County Board
of Elections and Registration

Approved by the State Election Board this _____ day of _____, 2016.

STATE ELECTION BOARD

BY: _____
BRIAN KEMP
CHAIRPERSON

EXHIBIT B

RETRIEVED FROM DEMOCRACYDOCKET.COM

Burke County, 2011-000095

Respondents: Barbara Hammett, Executive Director
Laverne Sello, Assistant Executive Director
Burke County Board of Election and Registration
Annette Walker Williams – (Not part of consent order)

Jurisdiction and Election: City of Waynesboro, Nov. 8, 2011 municipal election

Complainant: Brenda Lewis, City Council Member

Proposed Resolution: Cease and Desist, Public Reprimand, \$100.00 fine

Summary:

The Board voted to refer this case to the Attorney General's Office at its June, 10, 2014 meeting. The City of Waynesboro, Georgia had a municipal election on Nov. 8, 2011. The Burke County Board of Elections and Registration ran the election for the City. In connection with that election, Burke County elections staff accepted three (3) absentee ballots that were missing the elector's signature or mark. All three voters have physical disabilities, received assistance in voting, and the person assisting had signed the absentee ballot envelope. These allegations were referred to the Attorney General's Office as a possible violation of O.C.G.A. § 21-2-386(a)(1)(C) and O.C.G.A. § 21-2-381(b)(1).

Additionally, Respondents accepted two (2) absentee ballots that were missing a street address. These allegations were referred to the Attorney General's Office as a possible violation of O.C.G.A. § 21-2-386(a)(1)(C).

O.C.G.A. § 21-2-381(b)(1) requires that election officials verify the eligibility of voters applying for absentee ballots. There is no suggestion or documentation in the record that these election officials violated this code provision.

The Georgia Supreme Court has held that while O.C.G.A. § 21-2-386 provides a basis upon which an election official *may* reject an absentee ballot, rejection is not mandatory where a voter has failed to provide all "required information." *Jones v. Jesup*, 279 Ga. 531, 533 n. 5 (2005). In *Jones* the omitted information was the place, day and month of birth. However, nothing in O.C.G.A. § 21-2-386 makes an address more or less required than a day and month of birth, both are used to assist the local election official in confirming the identity of the voter where comparison of the voter's signature is insufficient. Therefore, an election official *does not* violate O.C.G.A. § 21-2-386(a)(1)(C) when they accept an absentee ballot despite the omission of a day and month of birth and/or an address, *if* the election official can verify the identity of the voter with the voter's signature and whatever other information is provided.

This interpretation of O.C.G.A. § 21-2-386(a)(1)(C) is also consistent with federal law which *prohibits* the denial of the right to vote “because of an error or omission on any record or paper . . . if such error or omission is not *material* in determining whether such individual is qualified under State law to vote in such election.” 52 U.S.C. § 10101 (emphasis added). Where the election official can verify the identity of the voter by comparing their signature on the absentee ballot envelope with the voter’s signature on file, the omission of the additional information of residence address and/or day and month of birth would not be material to that voter’s qualifications and the absentee ballot should be counted.

The proposed Consent Order concerns only the violation of O.C.G.A. § 21-2-386(a)(1)(C) for accepting three (3) absentee ballots without the elector’s signature or mark. The proposed Consent Order for Respondents calls for a Cease and Desist, Public Reprimand, and a \$100.00 civil fine.

I recommend that the Board accept the proposed consent order for Respondents.

RETRIEVED FROM DEMOCRACYDOCKET.COM

**BEFORE THE STATE ELECTION BOARD
STATE OF GEORGIA**

In the matter of :

**Burke County Board of Election and
Registration; Barbara N. Hammett,
and Laverne Sello,**

Respondents.

*
*
*
*
*
*
*
*

**SEB Case
2011-000095**

CONSENT ORDER

COMES NOW the State Election Board, by and through counsel, and the Burke County Board of Election and Registration, its Executive Director Barbara N. Hammett, and Assistant Executive Director Laverne Sello, and hereby enter into the following Consent Order for use in this matter before the State Election Board in lieu of an evidentiary hearing.

FINDINGS OF FACT and CONCLUSIONS OF LAW

The findings of fact set forth in the following Paragraphs 1 through 3 have been asserted against Respondents, the Burke County Board of Election and Registration, its Executive Director Barbara N. Hammett, and Assistant Executive Director Laverne Sello. Respondents desire that the above-captioned case be resolved in its entirety in order to avoid further litigation.

1.

During the 2011 City of Waynesboro municipal election, Respondents accepted three absentee ballots that failed to include the elector's signature or mark on the ballot envelope.

2.

All three of the electors who failed to sign their absentee ballot envelopes were disabled, and had had an eligible family member assist them with their ballot and said family member had properly executed the oath of person assisting elector on the ballot envelope.

3.

Respondents violated O.C.G.A. § 21-2-386(a)(1)(C) by accepting ballots without the voter's signature or mark.

ORDER

1.

This Consent Order addresses and resolves all matters regarding Respondents in connection with SEB case file 2011-000095.

2.

The Georgia State Election Board, having considered the particular facts and circumstances of this case, inclusive of the within and foregoing "Findings of Fact and Conclusions of Law" hereby ORDERS that Respondents Burke County Board

of Election and Registration, its Executive Director Barbara N. Hammett, and Assistant Executive Director Laverne Sello, cease and desist from further violations of the Election Code, and hereby publicly reprimands Respondents. The State Election Board further ORDERS Respondent Burke County Board of Elections and Registration to pay a one hundred dollar (\$100.00) civil penalty to the State Election Board within sixty days of acceptance of this Consent Order by the State Election Board.

3.

Respondent Burke County Board of Elections and Registration acknowledges that the members of the Respondent Burke County Board of Elections and Registration have read this Consent Order and understand the contents. Respondent Burke County Board of Elections and Registration understands that the Respondent Burke County Board of Elections and Registration has a right to a hearing in this matter. Respondent Burke County Board of Elections and Registration knowingly and voluntarily waives such right to a hearing, as well as any other rights under the Georgia Administrative Procedure Act pertaining to notice and hearing for contested cases, by entering into this Consent Order.

4.

Respondents Barbara N. Hammett and Laverne Sello acknowledge having read this Consent Order and understand the contents. Respondents understand that Respondents have a right to a hearing in this matter. Respondents knowingly and voluntarily waive such right to a hearing, as well as any other rights under the Georgia Administrative Procedure Act pertaining to notice and hearing for contested cases, by entering into this Consent Order.

5.

This Consent Order is entered in settlement of disputed matters, and the Consent Order entered herein is not to be construed as an admission of guilt or liability on the part of the Respondents but is entered herein to resolve this State Election Board case. Respondents understand that this Consent Order is a civil settlement and has no criminal ramifications.

6.

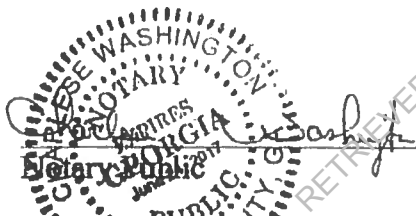
This Consent Order shall not become effective unless and until approved by the State Election Board. If not approved by and executed on behalf of the State Election Board, neither stipulation nor any other part of this agreement shall have any binding legal effect whatsoever and shall not constitute an admission against interest or prejudice the ability of either the State Election Board or Respondent to adjudicate this matter.

This 11th day of February, 2016.

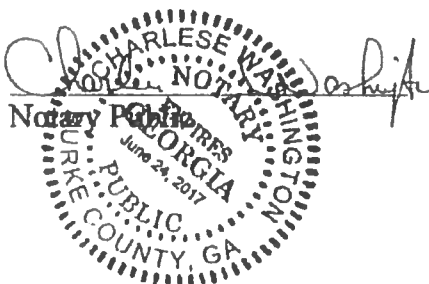
Sworn to and subscribed
before me this 11th day of
Feb. 11, 2016.



Sworn to and subscribed
before me this 11th day of
February, 2016.



Sworn to and subscribed
before me this 11th day of
February, 2016.



CONSENTED TO:

Barbara N. Hammett
BARBARA N. HAMMETT
RESPONDENT

CONSENTED TO:

Laverne Sello
LAVERNE SELLO
RESPONDENT

CONSENTED TO:

Harrison H. Simpson
HARRISON SIMPSON, Chairperson
BURKE COUNTY BOARD OF
ELECTIONS AND REGISTRATION
RESPONDENT

Approved by the State Election Board this ____ day of _____,
2016.

STATE ELECTION BOARD

BY: _____
BRIAN KEMP
CHAIRPERSON

RETRIEVED FROM DEMOCRACYDOCKET.COM

EXHIBIT C

RETRIEVED FROM DEMOCRACYDOCKET.COM

STATE ELECTION BOARD

PUBLIC MEETING AND HEARINGS
SEPTEMBER 11, 2018



STATE CAPITOL, ROOM 341
ATLANTA, GEORGIA 30334

MEETING MATERIALS FOR:
DAVID WORLEY

Telfair County, 2012-31

Respondents¹: Fred Haymons
Linda Cartwright
Betty Johnson
Rebecca Widner
Telfair County Board of Registrars

Jurisdiction and Election: Telfair County, July 31, 2012 general primary

Complainant: John Dopson

Proposed Resolution: CO with Telfair County Board of Commissioners

Summary:

The Board voted to refer this case to the Attorney General's office at its March 12, 2015 meeting.

Fred Haymons was charged with violating O.C.G.A. § 21-2-571 for voting while *knowing* he was not registered. At the time of the alleged violation, there were three (3) Fred Haymons registered living at the same address. Mr. Haymon appeared at the polls to vote, showed *his* own identification and was allowed to vote. There is no evidence that Mr. Haymons was aware that he was not registered. I recommend dismissing the charge against Fred Haymons.

Linda Cartwright was the poll manager in the polling place where Fred Haymons was allowed to vote during the July 31, 2012 general primary. Betty Johnson is the former probate judge for Telfair County. Both were charged with a violation of O.C.G.A. § 21-2-590(1) because a poll worker mistakenly gave Fred Haymons a ballot. A violation of O.C.G.A. § 21-2-590(1) requires knowledge, by the poll worker, that the person is unregistered. There is no evidence here that Betty Johnson, Linda Cartwright, or the poll worker that actually gave Haymons his ballot, knew he was not registered to vote. I recommend dismissing the charge against Linda Cartwright and Betty Johnson. *

Rebecca Widner was the Chief Registrar for Telfair County in 2012. Her office accepted four (4) absentee ballots without all of the requested information. Both Widner and the Telfair County Board of Registrars was charged with a violation of O.C.G.A. § 21-2-386(a)(1)(C) which requires the rejection of absentee ballots when not all of the requested identifying information is provided. However, the Georgia Supreme Court has held that while O.C.G.A. § 21-2-386 provides a basis upon which an election official *may* reject an absentee ballot, rejection is not mandatory where a voter has failed to provide all "required information." *Jones v. Jesup*, 279 Ga. 531, 533 n. 5 (2005). In *Jones* the omitted information was the place, day and month of birth. However, nothing in O.C.G.A. § 21-2-386 makes an address more or less required than a

¹ The Board voted to dismiss the charges against Respondents Linda Clemons Floyd, Patsy Vaughn, Alice Strong, and Beulah Dollar at its April, 2018 meeting.

day and month of birth, both are used to assist the local election official in confirming the identity of the voter where comparison of the voter's signature is insufficient. Therefore, an election official *does not* violate O.C.G.A. § 21-2-386(a)(1)(C) when they accept an absentee ballot despite the omission of a day and month of birth and/or an address, *if* the election official can verify the identity of the voter with the voter's signature and whatever other information is provided.

This interpretation of O.C.G.A. § 21-2-386(a)(1)(C) is also consistent with federal law which *prohibits* the denial of the right to vote "because of an error or omission on any record or paper . . . if such error or omission is not *material* in determining whether such individual is qualified under State law to vote in such election." 52 U.S.C. § 10101 (emphasis added). Where the election official can verify the identity of the voter by comparing their signature on the absentee ballot envelope with the voter's signature on file, the omission of the additional information of residence address and/or day and month of birth would not be material to that voter's qualifications and the absentee ballot should be counted.

I recommend that the Board dismiss the charge against Rebecca Widner and the Telfair County Board of Registrars.

Finally, Betty Johnson, the former probate judge was referred to the Attorney General's Office for a possible violation of O.C.G.A. § 21-2-451(a) when 162 voter certificates were found to be missing some piece of information. There is no evidence that Betty Johnson was "the poll officer that examined" each voter certificate, as described in O.C.G.A. § 21-2-451(a). However, Ms. Johnson was the probate judge/election superintendent during the July, 2012 general primary. Ms. Johnson retired at the end of 2012 and is currently over 80 years old. Telfair County Board of Commissioners and the current superintendent of elections have agreed to accept responsibility for the prior errors and enter into the attached consent order.

I recommend the Board accept the proposed consent order with the Telfair County Board of Commissioners and the current Telfair County Probate Judge as a final resolution to the charges against Betty Johnson.

BEFORE THE STATE ELECTION BOARD
STATE OF GEORGIA

In the matter of:

Fred Haymans, Linda Cartwright,
Rebecca Widner, Betty Johnson
and the Telfair County Board of
Registrars.

Respondents.

*
*
*
*
*
*
*

SEB Case No. 2012-31
Telfair County

FINAL ORDER

COMES NOW the State Election Board, having considered the facts and circumstances surrounding the alleged violations of the State Election Code by Fred Haymans, Linda Cartwright, Rebecca Widner, Betty Johnson, and the Telfair County Board of Registrars, Respondents, and hereby **DISMISSES WITH PREJUDICE** the claims against Respondents regarding violations of the State Election Code.

Approved by the State Election Board this _____ day of _____, 2018.

STATE ELECTION BOARD

BY: _____

BRIAN KEMP
CHAIRPERSON

**BEFORE THE STATE ELECTION BOARD
STATE OF GEORGIA**

In the matters of:

**Betty Johnson, former Probate Judge
and Election Supervisor of Telfair County,**

Respondent.

*
*
*
*
*
*
*

SEB Case 2012-31

CONSENT ORDER

COMES NOW the State Election Board, by and through counsel, and Dianne Walker, Probate Judge and Election Superintendent of Telfair County, Georgia, and the Telfair County Commission, and hereby enter into the following Consent Order for use in this matter before the State Election Board in lieu of an evidentiary hearing.

FINDINGS OF FACT and CONCLUSIONS OF LAW

The SEB considered this case at its March 12, 2015 meeting and found probable cause with regard to a violation of the Georgia Election Code by the former Probate Judge and Election Superintendent, Betty Johnson. Telfair County desires that the above-captioned case be resolved in its entirety in order to avoid further litigation. Telfair County acknowledges that there is evidence of a *prima facie* case supporting the following assertions and enters into this negotiated Consent Order to resolve the issues that arose during the July 31, 2012 General Primary Election.

1.

During the July 31, 2012 general primary, Respondent, Betty Johnson, was the Probate Judge and Election Supervisor for Telfair County.

2.

During the July 31, 2012 general primary, election officials under Ms. Johnson's supervision failed to record all required information on one hundred and sixty two (162) voter certificates. This constitutes a violation of O.C.G.A. § 21-2-451(a).

3.

The State Election Board has found that Respondent Betty Johnson has violated O.C.G.A. § 21-2-451(a).

4.

Respondent retired from the office of Probate Judge and Election Supervisor of Telfair County on December 31, 2012.

5.

The Telfair County Commission accepts responsibility for the civil fine assessed against the office of Probate Judge and Election Supervisor in this Consent Order.

ORDER

1.

This Consent Order addresses and resolves all matters regarding Respondent in connection with the July 31, 2012 general primary.

2.

The Georgia State Election Board, having considered the particular facts and circumstances of this case, inclusive of the within and forgoing "Findings of Fact and Conclusions of Law" hereby ORDERS that Respondent cease and desist from further violations of the Election Code, and hereby publicly reprimands Respondent. Because the

This 22 day of May, 2018.

Sworn to and subscribed
before me this 22 day
of May, 2018

Phyllis H Long
NOTARY PUBLIC

CONSENTED TO:

Dianne M Walker
DIANNE WALKER
Telfair County Probate Judge and
Election Superintendent

Sworn to and subscribed
before me this 22nd day
of May, 2018

[Signature]
NOTARY PUBLIC

My Commission Expires Aug. 25, 2019

CONSENTED TO:

[Signature]
ANNIE C. WILLIAMS, CHAIRPERSON
Telfair County Board of Commissioners

Approved by the State Election Board this _____ day of _____, 2018.

STATE ELECTION BOARD

BY: _____
HON. BRIAN KEMP, CHAIRPERSON

EXHIBIT 2

RETRIEVED FROM DEMOCRACYDOCKET.COM



P.O. Box 77208, Atlanta, GA 30357
770.303.8111 | syoung@acluga.org

November 8, 2018

Lynn Ledford
Elections Director
Gwinnett County Board of Voter Registrations and
Elections
Lynn.ledford@gwinnettcountry.com

CC: All Other County Elections Officials¹

Via E-mail and Publication

Re: Demand to Count Absentee Ballots Missing Birthdate Information

To Gwinnett County Board of Voter Registration & Elections, and all other county elections officials,

Publicly available data indicates that Gwinnett County is the only known county that is rejecting absentee ballots solely for failing to include birthdate information, and that nearly 1,200 ballots have been rejected on this basis. However, according to an internal memo from the Georgia Attorney General's Office, attached as Exhibit A, this is illegal.

The opinion from the Georgia Attorney General's Office, relying on an opinion from the Georgia Supreme Court, states that while O.C.G.A. § 21-2-386(a)(1)(C) provides that "failure to furnish required information" is a "ground for rejection" of an absentee ballot, that provision "does not mandate the automatic rejection of any absentee ballot lacking the elector's place and/or date of birth." *Jones v. Jessup*, 279 Ga. 531, 533 n.5 (2005). Thus, as the Attorney General's Office concluded, "an election official *does not* violate O.C.G.A. § 21-2-386(a)(1)(C) when they accept an absentee ballot despite the omission of a date and month of birth, . . . *if* the election official can verify the identity of the voter with the voter's signature." See Exhibit A.

Most importantly, the Attorney General's Office concluded that rejecting absentee ballots solely based on missing birthdate information violates federal law. As the Georgia Attorney General's Opinion goes on to state, "federal law . . . *prohibits* the denial of the right to vote 'because of an error or omission on any record or paper . . . if such error or omission is not *material* in determining whether such individual is qualified under State law to vote in such election.'" 52 U.S.C. § 10101. "Where the election official can verify the identity of the voter by comparing their signature on the absentee ballot envelope with the voter's signature on file, the

¹ The ACLU of Georgia will be transmitting this letter by e-mail to all county elections officials for whom we have an email address on file.

omission of the additional information . . . day and month of birth would not be material to that voter's qualifications and the absentee ballot should be counted." Exhibit A (emphasis added). And as your office is aware, voters whose signatures are deemed not to match must be provided an opportunity to confirm their identity pursuant to court order.

For the reasons provided by the Georgia Attorney General's Office, we demand that Gwinnett County, and all county officials, count all absentee ballots even if they are missing birthdate information.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean J. Young", written in a cursive style.

Sean J. Young
Legal Director
ACLU of Georgia

RETRIEVED FROM DEMOCRACYDOCKET.COM

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RHONDA J. MARTIN, DANA BOWERS,
JASMINE CLARK, SMYTHE DUVAL,
JEANNE DUFORT and THE GEORGIA
COALITION FOR THE PEOPLE'S
AGENDA, INC.,

Plaintiffs,

CAROLYN BOURDEAUX FOR
CONGRESS and FAZAL KHAN,

Proposed Plaintiff-Intervenors,

v.

BRIAN KEMP, SECRETARY OF STATE
OF GEORGIA; REBECCA N.
SULLIVAN, RALPH F. "RUSTY"
SIMPSON, DAVID J. WORLEY and
SETH HARP; STEPHEN DAY, JOHN
MANGANO, ALICE O'LENICK, BEN
SATTEFIELD and BEAUTY
BALDWIN,

Defendants.

Civil Action File No.

1:18-cv-04776 LMM

ORDER

This matter is before the Court on Proposed Plaintiffs-Intervenors Carolyn Bourdeaux for Congress and Fazal Khan's Motion to Intervene. The Court having reviewed the Motion to Intervene, and for good cause shown,

It is therefore ORDERED that Proposed Plaintiffs-Intervenors' Motion to Intervene is hereby granted.

ORDERED, this _____ day of November, 2018.

UNITED STATES DISTRICT JUDGE

Prepared by:

/s/ Veronica Higgs Cope
GA Bar No.: 352145
The Cope Law Firm, P.C.
2330 Scenic Highway
Snellville, GA 30078
Telephone: (404) 917-1077
Facsimile: (866) 614-8295
vcope@copelawfirm.com

Marc E. Elias*
Bruce V. Spiva*
Brian S. Marshall*
Aria C. Branch*
K'Shaani Smith*
PERKINS COIE LLP
700 Thirteenth Street, N.W., Suite 600
Washington, D.C. 20005-3960
Telephone: (202) 654-6200

Facsimile: (202) 654-6211
MElias@perkinscoie.com
BSpiva@perkinscoie.com
BMarshall@perkinscoie.com
ABranch@perkinscoie.com
KShaaniSmith@perkinscoie.com

Counsel for Proposed Plaintiff-Intervenors

*Seeking Pro Hac Vice Admission

RETRIEVED FROM DEMOCRACYDOCKET.COM

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing Proposed Order Granting Plaintiff-Intervenor Carolyn Bourdeaux for Congress Motion to Intervene has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

Dated: November 11, 2018

/s/ Veronica Higgs Cope

*Counsel for Proposed Plaintiff-
Intervenor*

RETRIEVED FROM DEMOCRACYDOCKET.COM

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of November 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to parties in this action.

Dated: November 11, 2018

/s/ Veronica Higgs Cope

Counsel for Plaintiff-Intervenor

RETRIEVED FROM DEMOCRACYDOCKET.COM

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RHONDA J. MARTIN, DANA BOWERS,
JASMINE CLARK, SMYTHE DUVAL,
JEANNE DUFORT and THE GEORGIA
COALITION FOR THE PEOPLE'S
AGENDA, INC.,

Plaintiffs,

and

CAROLYN BOURDEAUX FOR
CONGRESS and FAZAL KHAN,

v.

ROBYN A. CRITTENDEN, SECRETARY
OF STATE OF GEORGIA; REBECCA N
SULLIVAN, RALPH F. "RUSTY"
SIMPSON, DAVID J. WORLEY and SETH
HARP; STEPHEN DAY, JOHN
MANGANO, ALICE O'LENICK, BEN
SATTEFIELD and BEAUTY BALDWIN,

Defendants.

Civil Action File No.

1:18-cv-04776 LMM

**[PROPOSED] PLAINTIFF-INTERVENORS' EMERGENCY
MOTION FOR TEMPORARY RESTRAINING ORDER AND
ORDER TO SHOW CAUSE AND FOR A PRELIMINARY
INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65, Plaintiff-Intervenors
CAROLYN BOURDEAUX FOR CONGRESS and Fazal Khan, respectfully
move for a temporary restraining order and preliminary injunction and order to

show cause why a temporary restraining order and/or preliminary injunction should not issue. Specifically, Proposed Plaintiff-Intervenors move for a temporary restraining order prohibiting Defendants, their officers, employees, and agents, all persons acting in active concert or participation with Defendants, or under Defendants' supervision, direction, or control, and all other persons within the scope of Federal Rule of Civil Procedure 65, from certifying the 2018 General Election results for the U.S. House of Representatives Congressional District 7 until all absentee ballots that were improperly rejected in violation of 42 U.S.C. § 10101, and the First and Fourteenth Amendments and pursuant to 42 U.S.C. §§ 1983 and 1988 have been counted. Proposed Plaintiff-Intervenors further move for a preliminary injunction to order Defendants to count the unlawfully rejected ballots and include them in the certified returns of the election, and to provide notice and a reasonable opportunity to cure absentee ballots rejected because the ballot was submitted without a signed oath.

Dated: November 11, 2018

Respectfully submitted,

/s/ Veronica Higgs Cope
GA Bar No.: 352145
The Cope Law Firm, P.C.
2330 Scenic Highway
Snellville, GA 30078
Telephone: (404) 917-1077
Facsimile: (866) 614-8295
vcope@copelawfirm.com

Marc E. Elias*

Bruce V. Spiva*

Brian S. Marshall*

Aria C. Branch*

K'Shaani Smith*

PERKINS COIE LLP

700 Thirteenth Street, N.W., Suite 600

Washington, D.C. 20005-3960

Telephone: (202) 654-6200

Facsimile: (202) 654-6211

MElias@perkinscoie.com

BSpiva@perkinscoie.com

BMarshall@perkinscoie.com

ABranch@perkinscoie.com

KshanniSmith@perkinscoie.com

Counsel for Plaintiffs-Intervenors

*Seeking *Pro Hac Vice* Admission

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of November 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to parties in this action.

Dated: November 11, 2018

/s/ Veronica Higgs Cope
GA Bar No.: 352145
The Cope Law Firm, P.C.
2330 Scenic Highway
Snellville, GA 30078
Telephone: (404) 917-1077
Facsimile: (866) 614-8295
vcope@copelawfirm.com

Counsel for Plaintiff-Intervenors

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RHONDA J. MARTIN, DANA BOWERS,
JASMINE CLARK, SMYTHE DUVAL,
JEANNE DUFORT, and THE GEORGIA
COALITION FOR THE PEOPLE'S
AGENDA, INC.,

Plaintiffs,

and

CAROLYN BOURDEAUX FOR
CONGRESS and FAZAL KHAN,

Plaintiff-Intervenors,

v.

BRIAN KEMP, SECRETARY OF STATE
OF GEORGIA; REBECCA N.
SULLIVAN, RALPH F. "RUSTY"
SIMPSON, DAVID J. WORLEY, and
SETH HARP; STEPHEN DAY, JOHN
MANGANO, ALICE O'LENICK, BEN
SATTEFIELD, and BEAUTY
BALDWIN,

Defendants.

Civil Action File No.

1:18-cv-04776 LMM

**[PROPOSED] PLAINTIFF-INTERVENORS' BRIEF IN SUPPORT
OF EMERGENCY MOTION FOR TEMPORARY RESTRAINING
ORDER AND ORDER TO SHOW CAUSE AND FOR A
PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65, Plaintiff-Intervenors CAROLYN BOURDEAUX FOR CONGRESS and FAZAL KHAN respectfully submit the following memorandum of law in support of their emergency motion for a temporary restraining order and preliminary injunction and order to show cause why a temporary restraining order and/or preliminary injunction should not issue. Specifically, Proposed Plaintiff-Intervenors move for a temporary restraining order prohibiting Defendants, their officers, employees, and agents, all persons acting in active concert or participation with Defendants, or under Defendants' supervision, direction, or control, and all other persons within the scope of Federal Rule of Civil Procedure 65, from certifying the 2018 General Election results for the U.S. House of Representatives Congressional District 7 until all absentee ballots that were improperly rejected in violation of the Civil Rights Act, and the First and Fourteenth Amendments and pursuant to 42 U.S.C. §§ 1983 and 1988 have been counted. Proposed Plaintiff-Intervenors further move for a preliminary injunction to order Defendants to count the unlawfully rejected ballots and include them in the certified returns of the election. Proposed Plaintiff-Intervenors further move for a preliminary injunction requiring Defendants to allow voters to cure absentee ballots on which they failed to sign

the oath and extending the cure period to three business days after this Court issues any such Order.

I. BACKGROUND

Under Georgia law, any eligible elector may vote by mail (“absentee mail voters” or “mail voters”). Given the highly-publicized dangers associated with voting in person using Georgia’s paperless Direct Recording Electronic (“DRE”) voting system, applications for absentee ballots surged in advance of the 2018 general elections. Democratic, Republican, and Libertarian gubernatorial candidates all urged Georgia voters to vote absentee by mail, and Georgia’s Libertarian candidate for Secretary of State made the same public recommendation.

Gwinnett County voters who request an absentee ballot receive two return envelopes. The absentee ballot should be placed inside the smaller envelope, which is provided to ensure the secrecy of the ballot. The smaller ballot-secrecy envelope is then placed inside of the larger envelope. The outer envelope includes a form printed in small-type font in English and Spanish, which includes an oath for a voter to swear to his or her eligibility. *See* Complaint, Ex. D. There are also blank spaces provided for a voter’s year of birth and address. The envelope does not indicate that providing these details

is mandatory. Because this information is provided on the outer envelope, it is visible when the envelope is returned by mail.

The promise of convenient and reliable no-excuse absentee voting has proven to be false for more than 900 Georgia voters in Gwinnett County, who now stand to be disenfranchised as a result of Defendants' draconian interpretation of O.C.G.A. § 21-2-3986(a)(1)(C), which Defendants now interpret to allow election officials to reject absentee ballots on the basis of an error or omission in the voter's year of birth or address with no opportunity for the voter to cure. Defendants also have not provided any opportunity for a voter to cure an unsigned absentee ballot.

Gwinnett County, in particular has rejected an alarmingly high percentage of absentee ballots cast in the 2018 General Election. As of November 11, the Secretary of State's data shows that Gwinnett County had rejected 901 absentee mail ballots, not including voters whose absentee ballots were originally rejected but who were able to cast ballots on Election Day or ballots rejected due to alleged signature mismatches. Of these 901 rejected absentee ballots, at least 265 ballots were rejected solely because voters omitted the year of their birth, and at least another 58 rejections were solely because the voters erroneously wrote that they were born in 2018. Gwinnett

County rejected at least another 8 ballots for failing to provide a residential address and rejected at least 22 ballots because they omitted both the voter's address and year of birth. The County has rejected 394 ballots for unspecified "insufficient oath information," which is an undefined rejection code, and could include any one or several of these deficiencies. The remaining 154 rejections were for signature omissions and other alleged discrepancies.

Under Georgia law, an absentee ballot *may* be rejected "[i]f the elector has failed to sign the oath, or if the signature does not appear to be valid, or if the elector has failed to furnish required information or information so furnished does not conform with that on file in the registrar's or clerk's office, or if the elector is otherwise found disqualified to vote." O.C.G.A. § 21-2-386(a)(1)(C). Federal law, however, prohibits states from using immaterial errors or omissions in information provided by the voter as a barrier to voting. Under the Civil Rights Act, 52 U.S.C. § 10101(a)(2)(B), any person acting under color of law shall not:

deny the right of any individual to vote in any election because of an error or omission on any record or paper relating to any application, registration, or other act requisite to voting, if such error or omission is not material in determining whether such individual is qualified under State law to vote in such election.

While a failure to furnish required information is a ground for rejection under O.C.G.A. § 21-2-386(a)(1)(C), the Georgia Supreme Court has held that nothing in the statute mandates the “automatic rejection of any absentee ballot lacking the elector’s place and/or date of birth.” *Jones v. Jessup*, 279 Ga. 531, 533 n.5 (2005).

Further, the Defendant Secretary of State has already conceded that “where the year of birth is not necessary to confirm the identity of a voter, it is not otherwise required by O.C.G.A. § 21-2-386(a)(1)(C).” *Martin v. Kemp*, No. 18-4776 Dkt. No. [36] at 3–4; *see also In re Burke Cty. Bd. of Election and Registration*, SEB Case No. 2011-000095 (Feb. 11, 2016), attached as Worley Decl. Ex. B (concluding accepting absentee ballots that were “missing a street address” did not violate Georgia law); *In re Gale and McIntosh Cty. Bd. of Election and Registration*, SEB Case No. 2012-131 (Feb. 1, 2016) at 11, attached as Worley Decl. Ex. A (concluding accepting absentee ballots that were missing a date of birth, address, or listed a P.O. Box number as a residential address did not violate Georgia law); *see also In re Haymans*, SEB Case No. 2012-31 (May 22, 2018) (dismissing charge for violating O.C.G.A. § 21-2-386(a)(1)(C) brought against election officials who accepted absentee ballots without all of the requested information in the oath). Indeed, the

Attorney General's office and the State Election Board have acknowledged that federal law "*prohibits* the denial of the right to vote 'because of an error or omission on any record or paper . . . if such error or omission is not *material* in determining whether such individual is qualified under State law to vote in such election.'" *See, e.g.* Worley Decl. Ex. A at 12 (emphasis in original) (citing 52 U.S.C. § 10101).

Plaintiff-Intervenors Bourdeaux for Congress and Fazal Khan, bring this Emergency Motion for Temporary Restraining Order and Order to Show Cause to restrain the Defendants from certifying the 2018 General Election results until all absentee ballots that were improperly rejected in violation of the Civil Rights Act, the First and Fourteenth Amendments, and 42 U.S.C. §§ 1983 and 1988, are counted. Plaintiff-Intervenors further move for a preliminary injunction requiring such votes to be counted and included in the certified totals. Absent emergency relief, these 901 Gwinnett County voters whose ballots were improperly rejected will be disenfranchised, not based on their eligibility to vote, but rather, because of Defendants' unlawful interpretation of O.C.G.A. § 21-2-386(a)(1)(C).

II. ARGUMENT

A. Preliminary Injunction Standard

“A party seeking a preliminary injunction bears the burden of establishing its entitlement to relief.” *Scott v. Roberts*, 612 F.3d 1279, 1289–90 (11th Cir. 2010). “To obtain such relief, the moving party must show: (1) a substantial likelihood of success on the merits; (2) that it will suffer irreparable injury unless the injunction is issued; (3) that the threatened injury outweighs possible harm that the injunction may cause the opposing party; and (4) that the injunction would not disserve the public interest.” *GeorgiaCarry.org v. U.S. Army Corps of Eng’rs*, 788 F.3d 1318, 1322 (11th Cir. 2015). The standard for a temporary restraining order is the same. *See Parker v. State Bd. of Pardons and Paroles*, 275 F.3d 1032, 1034-35 (11th Cir. 2001).

B. Plaintiff is Likely to Succeed on the Merits.

1. Rejecting Absentee Ballots for Errors in the Voter’s Address or Year of Birth Violates the Materiality Provision of the Civil Rights Act.

It is a violation of federal law to “deny the right of any individual to vote in any election because of an error or omission on any record or paper relating to any application, registration, or other act requisite to voting, if such error or omission is not material in determining whether such individual is qualified under

State law to vote in such election.” 52 U.S.C. § 10101(a)(2)(B).¹ This requirement of the Civil Rights Act is commonly known as the “Materiality Provision.”

The Materiality Provision “forbids the practice of disqualifying potential voters for their failure to provide information irrelevant to determining their eligibility to vote.” *Schwier*, 340 F.3d at 1294. “This provision was intended to address the practice of requiring unnecessary information for voter registration with the intent that such requirements would increase the number of errors or omissions on the application forms, thus providing an excuse to disqualify potential voters.” *Id.* “[O]ne ‘such tactic[] [was to] disqualify[] an applicant who failed to list the exact number of months and days in his age.’” *Id.* (quoting *Condon v. Reno*, 913 F.Supp. 946, 949–50 (D.S.C. 1995)).

“[T]he only *qualifications* for voting in Georgia are U.S. Citizenship, Georgia residency, being at least eighteen years of age, not having been adjudged incompetent, and not having been convicted of a felony.” *Schwier*, 340 F.3d at 1297 (emphasis in original) (citing O.C.G.A. § 21–2–216). When voters sign the ballot envelope oath, they “swear or affirm” that they “possess the qualifications of an elector required by the laws of the State of Georgia.” O.C.G.A. § 21-2-

¹ 52 U.S.C. § 10101(a)(2)(B) was previously codified at 42 U.S.C. § 1971(a)(2)(B). The Eleventh Circuit has recognized that the Materiality Provision is enforceable by a private right of action. *Schwier v. Cox*, 340 F.3d 1284, 1296–97 (11th Cir. 2003).

384(c)(1). Although the form requests “Elector’s Residence Address” and the “Year of Elector’s Birth,” *id.*, errors in responses to either question do not put the voter’s eligibility in genuine doubt, particularly given that this information has already been provided under penalty of perjury on the voter registration application.² The rejection of their ballots on those grounds is therefore unlawful, and Plaintiff-Intervenors are likely to prevail on Count I of their Complaint.

2. Defendants’ Rejection of These Ballots Unconstitutionally Imposes A Severe Burden on the Right to Vote Without Advancing Any State Interest.

² The voter registration application also requires voters to swear or affirm they meet each of those qualifications:

I SWEAR OR AFFIRM:

Are you a citizen of the United States of America?

Check One: Yes ☐ No ☐

Will you be 18 years of age on or before election day?

Check One: Yes ☐ No ☐

If you checked “No” in response to either of these questions, do not complete this form.

I SWEAR OR AFFIRM THAT:

I reside at the address listed above.

I am eligible to vote in Georgia.

I am not serving a sentence for having been convicted of a felony involving moral turpitude.

I have not been judicially declared to be mentally incompetent.

State of Georgia Application For Voter Registration, http://sos.ga.gov/admin/files/GA_VR_APP_2018.pdf (last visited Nov. 11, 2018). *See also* Register To Vote In Your State By Using This Postcard Form and Guide (“Federal Form”) at 3, 7, available at https://vote.gov/files/federal-voter-registration_1-25-16_english.pdf (last visited Nov. 11, 2018) (providing for the same attestation via item 9 of the Georgia instructions). Accordingly, it is unnecessary for voters to provide any additional information on the absentee ballot form itself to establish they are qualified to vote.

“No right is more precious in a free country than that of having a voice in the election of those who make the laws under which, as good citizens, we must live. Other rights, even the most basic, are illusory if the right to vote is undermined.” *Wesberry v. Sanders*, 376 U.S. 1, 17 (1964). Accordingly, election laws burdening that fundamental right are subject to searching judicial scrutiny. *Fla. Democratic Party v. Scott*, 215 F. Supp. 3d 1250, 1256-57 (N.D. Fla. 2016).

In *Anderson v. Celebrezze*, 460 U.S. 780 (1983), and *Burdick v. Takushi*, 504 U.S. 428 (1992), the Supreme Court laid out a “flexible standard” to resolve constitutional challenges to state election laws that burden voting rights. *See Anderson*, 460 U.S. at 789. “A court considering a challenge to a state election law must weigh the character and magnitude of the asserted injury to the rights . . . that the plaintiff seeks to vindicate against the precise interests put forward by the State as justifications for the burden imposed by its rule, taking into consideration the extent to which those interests make it necessary to burden the plaintiff’s rights.” *Burdick*, 504 U.S. at 433–34 (quotation marks and citation omitted). When a regulation subjects the right to vote to a “severe” restriction, the restriction “must be narrowly drawn to advance a state interest of compelling importance.” *Norman v. Reed*, 502 U.S. 279, 280 (1992). Less severe burdens remain subject to balancing. But “[h]owever slight” the burden on the right to vote

“may appear,” “it must be justified by relevant and legitimate state interests ‘sufficiently weighty to justify the limitation.’” *Crawford v. Marion Cty. Election Bd.*, 553 U.S. 181, 191 (2008) (plurality) (quoting *Norman*, 502 U.S. at 288-89).

Here, the rejection of 901 absentee ballots would result in these voters’ disenfranchisement in the 2018 general election. These rejections are based on errors and omissions on a form printed in tiny type and provides no clear warning that the information requested is mandatory. And the state does not provide a reasonable opportunity to cure the alleged defects. That sort of categorical denial of the right to vote on the basis of the voter’s clerical precision plainly amounts to a severe burden on the franchise. *See, e.g., Ayers-Schaffner v. DiStefano*, 860 F. Supp. 918, 921 (D.R.I.), *aff’d*, 37 F.3d 726 (1st Cir. 1994) (“A complete denial of the right to vote is a restriction of the severest kind.”); *see also Ne. Ohio Coal. for the Homeless v. Husted*, 696 F.3d 580, 585-87 (6th Cir. 2012) (“summary” and “automatic” nature of disqualification of right-place, wrong-precinct ballots suggests burden on right to vote is “substantial”).

Given the likelihood of total disenfranchisement of more than 900 Georgia voters based on Defendants’ rejection for errors and omissions on the absentee ballot return envelope, Defendants must assert an interest that is “sufficiently weighty” to justify rejecting and discarding scores of absentee ballots and show

that their official actions in discarding such absentee ballots is narrowly drawn to further that interest. *Norman*, 502 U.S. at 288-89. Defendants cannot do so. There is no valid, let alone compelling, reason to disenfranchise more than 900 voters based on minor errors on the voters' absentee ballot envelopes.

Nor can the Defendants justify not providing voters who submitted ballots without a signature an opportunity to cure. Defendants have already implemented this Court's order requiring that voters whose absentee ballot signatures purportedly do not match their signatures on file to be cured on the same terms as provisional ballots. The state cannot justify failing to afford voters who omitted their signature the same opportunity after notice and a reasonable opportunity to cure the deficiency.

Plaintiff-Intervenors are therefore likely to prevail on Count II of their Complaint.

3. The Unequal Standards to Reject Absentee Ballots in Forsyth County and Gwinnett County Violate Equal Protection.

The Equal Protection Clause prevents states from "valu[ing] one person's vote over that of another" by "arbitrary and disparate treatment." *Bush v. Gore*, 531 U.S. 98, 104-05 (2000). Equality is required not only in the "initial allocation of the franchise," but also to "the manner of its exercise." *Id.* "[T]he question that

is of constitutional dimension [is]: Are voters in [one county] less likely to cast an effective vote than voters in [another county]?” *Wexler v. Anderson*, 452 F.3d 1226, 1231 (11th Cir. 2006).

Forsyth County absentee voters were far less likely to have their votes rejected than Gwinnett County voters. More than six percent of absentee ballots in Gwinnett County have been rejected due to purported errors or omissions in the year-of-birth, address, signature, or other unspecified deficiencies in the oath submitted by absentee voters. *See* Complaint, Exs. A, B. Forsyth County has not rejected any ballots due to errors or omissions in the voter’s address or the voter’s year or date of birth. *See id.*, Ex. C. The only reasonable inference from these facts is that the frequency of rejections of absentee ballots is due to county officials applying markedly different standards in evaluating the sufficiency of absentee ballot oaths. Different standards to reject ballots are inconsistent with the Equal Protection Clause. The only remedy available for this infirmity is to order that such ballots (with immaterial errors or omissions) be counted throughout the whole of the Seventh Congressional District. Plaintiff-Intervenors are therefore likely to prevail on Count III of their Complaint.

C. Plaintiff Satisfies the Other Preliminary Injunction Factors.

1. An Injunction Is Necessary to Avoid Irreparable Harm.

There is no genuine dispute that the harm threatened here—disenfranchisement in the November 2018 election—is irreparable. “This isn’t golf: there are no mulligans.” *Fla. Democratic Party*, 215 F. Supp. 3d at 1258. Once an election is decided, “‘there can be no do-over and no redress.’” *Id.* (citing *League of Women Voters of N.C. v. North Carolina*, 769 F.3d 224, 247 (4th Cir. 2014)). Thus, courts have long recognized that when an “abridgment to the voters’ constitutional right to vote” is imminent, “irreparable harm is presumed and no further showing of injury need be made.” *Touchston v. McDermott*, 234 F.3d 1133, 1158-59 (11th Cir. 2000); *see also Obama for Am. v. Husted*, 697 F.3d 423, 436 (6th Cir. 2012) (“OFA”) (abridgement of right to vote constitutes irreparable harm); *Council of Alt. Political Parties v. Hooks*, 121 F.3d 876 (3d Cir. 1997) (same); *Williams v. Salerno*, 792 F.2d 323, 326 (2d Cir. 1986) (same).

The unofficial tally of votes on the Georgia Secretary of State’s website has Rob Woodall leading Carolyn Bourdeaux by 901 votes (139,837 to 138,936), or 0.32% of the 278,773 votes cast. Under Georgia law, a candidate who trails the certified winner by one percent or less of the votes cast may request a recount within two days of the certification. Ga. Code § 21-2-495(c)(1). However,

Proposed Plaintiff-Intervenors understand that rejected absentee ballots will be excluded from any recount. Accordingly, certification should be temporarily restrained to avoid the irreparable harm that would result from the exclusion of these rejected ballots from any recount.

2. The Balance of Hardships Weighs in Favor of an Injunction.

The balance of hardships favors the Plaintiff-Intervenors and weighs in favor of issuing emergency injunctive relief. Delaying the certification of the canvass to ensure it is accurate and lawful is, at most, a minor administrative inconvenience. With respect to a preliminary injunction requiring the votes to be counted, there is no legitimate state interest in discarding lawful votes.

Conversely, if relief is not granted, hundreds of Georgia voters will be disenfranchised, not because they were ineligible to vote, but because of Defendants' unlawful interpretation of O.C.G.A. § 21-2-3986(a)(1)(C) to require a perfect match between the information that a voter provides on the absentee ballot envelope and the information in the voter file. Under these circumstances, equity plainly favors the interest of the Plaintiff-Intervenors. *Fla. Democratic Party*, 215 F. Supp. 3d at 1258 ("it would be nonsensical to prioritize [administrative] deadlines over the right to vote"); *see also Taylor v. Louisiana*,

419 U.S. 522, 535 (1975) (stating “administrative convenience” cannot justify the deprivation of a constitutional right).

3. A Temporary Restraining Order And Injunction Is in The Public Interest.

The public has a paramount interest in elections where every eligible voter may cast a ballot and have it counted. *See Charles H. Wesley Educ. Found., Inc. v. Cox*, 408 F.3d 1349, 1355 (11th Cir. 2005); *see also LOWV*, 769 F.3d at 248 (“[t]he public has a ‘strong interest in exercising the fundamental political right to vote.’” (quoting *Purcell v. Gonzalez*, 549 U.S. 1, 4 (2006))); *OFA*, 697 F.3d at 437 (“The public interest . . . favors permitting as many qualified voters to vote as possible.”). Under the circumstances, an injunction requiring Defendants to count all ballots that it had previously rejected pursuant to Defendants’ erroneous, unlawful interpretation of O.C.G.A. § 21-2-3986(a)(1)(C) to require the inclusion and perfect match of information provided on an absentee ballot and the information within a voter’s registration file, including immaterial omissions or errors, is plainly in the public interest. The Constitution guarantees the right of voters “to cast their ballots and have them counted.” *United States v. Classic*, 313 U.S. 299, 315 (1941).

III. CONCLUSION

For the reasons provided herein and in Plaintiff-Intervenors' contemporaneously-filed emergency pleadings, Plaintiff-Intervenors respectfully request that the Court issue an emergency temporary restraining order restraining Defendants, their officers, employees, and agents, all persons acting in active concert or participation with Defendants, or under Defendants' supervision, direction, or control, from certifying the results of the election, and thereafter issue a preliminary injunction (1) requiring votes unlawfully rejected be included in any certified returns of the election, and (2) permitting the cure of absentee ballots for which the voter failed to sign the oath on the back of the absentee ballot envelope within three business days of this Court's issuance of any such order.

Dated: November 11, 2018

Respectfully submitted,

/s/ Veronica Higgs Cope
GA Bar No.: 352145
The Cope Law Firm, P.C.
2330 Scenic Highway
Snellville, GA 30078
Telephone: (404) 917-1077
Facsimile: (866) 614-8295
vcope@copelawfirm.com

Marc E. Elias*
Bruce V. Spiva*
Brian Marshall*
Aria C. Branch*
K'Shaani Smith*

PERKINS COIE LLP

700 Thirteenth Street, N.W., Suite 600
Washington, D.C. 20005-3960
Telephone: (202) 654-6200
Facsimile: (202) 654-6211
MElias@perkinscoie.com
BSpiva@perkinscoie.com
BMarshall@perkinscoie.com
ABranch@perkinscoie.com
KShaaniSmith@perkinscoie.com

Counsel for Plaintiff-Intervenors

**Pro Hac Vice Applications forthcoming*

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing Proposed Order Granting Plaintiff-Intervenor Carolyn Bourdeaux for Congress Motion to Intervene has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

Dated: November 11, 2018

/s/ Veronica Higgs Cope

*Counsel for Proposed Plaintiff-
Intervenor*

RETRIEVED FROM DEMOCRACYDOCKET.COM

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of November 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to parties in this action.

Dated: November 11, 2018

/s/ Veronica Higgs Cope

Counsel for Plaintiff-Intervenor

RETRIEVED FROM DEMOCRACYDOCKET.COM