

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION**

FAIR FIGHT, INC., et al.,

Plaintiffs,

v.

TRUE THE VOTE, INC., et al.,

Defendants,

**Case No. 2:20-CV-00302-SCJ**

**DECLARATION OF GAMALIEL WARREN TURNER, SR.**

Pursuant to 28 U.S.C. § 1746, I, Gamaliel Warren Turner, Sr., declare as follows:

1. I am over the age of 18 and I make this declaration based upon my personal knowledge and experience.

2. I am 68 years old and a retired veteran. I have lived in Georgia for almost my entire life and am registered to vote in Muscogee County. I registered to vote in Georgia when I turned 18 and have voted in almost every election for the past 50 years.

3. I am employed as a government contractor with the United States Navy. In October 2019, my contract required me to temporarily relocate to Camarillo, California. I submitted a postal service change-of-address notification to avoid missing mail deliveries while away on temporary work assignment.

4. I do not plan to remain in California, and have always intended, and continue to intend, to return to Georgia. For this reason, I have never considered registering to vote in California or otherwise changing my citizenship or residence to California.

5. I own a home in Columbus, Georgia. My nephew is currently house-sitting at the residence while I am away. He does not pay any rent, and the utilities remain in my name. I also continue to pay taxes on my property. I have never changed my drivers' license from Georgia. Both of my cars are registered in Muscogee County.

6. I voted by absentee ballot in the 2020 primary and general elections in Georgia. Because of my temporary assignment in California, I have requested that the registrar mail my ballot to my California address until I return to Georgia.

7. When I had not received my absentee ballot for the January 2021 runoff elections by late December 2020, I became anxious that any additional delay would jeopardize my ability to receive and return my absentee ballot in time for it to be counted. I raised my concern with a clerk at the Muscogee County registrar's office, who informed me that the voter system reflected that I was one of approximately 4,000 voters in Muscogee County who had been challenged for requesting an absentee ballot to be sent out-of-state.

8. Because my eligibility to vote had officially been challenged, I became worried about the legality of my participation in the January runoff elections.

9. I successfully sued the Muscogee County Board of Elections to ensure my ballot would be counted, but the entire experience was scary, confusing, and intimidating. Until the Court ruled in my favor, I did not know how I would be able to prove my residency in Georgia or whether I would be able to get everything straightened out in time.

10. Once I received my ballot in the mail, I had to immediately fill out my ballot and send it back to Georgia so that it arrived at the county registrar's office in time to be counted for the election. To ensure that happened, I had to send the ballot via FedEx and pay the extra charge to expedite delivery. The additional cost I had to incur to ensure my ballot was counted is equivalent to a modern-day poll tax.

11. I am a Black voter and a veteran, and I grew up in an era of segregation when it was common for public officials and certain members of our communities to make it difficult for us to vote. Having to deal with these kinds of obstacles still today is both discouraging and aggravating, and makes it seem like we should just give up.

12. Thinking back to the senseless difficulty of my voting experience in the January runoff elections gives me PTSD and increased anxiety and anguish about the great lengths I have to go through in order to make my voice heard. I wonder if

it is even worth trying to vote again given the trouble that the voter challenge has caused me.

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

Executed on this <sup>12</sup>\_\_\_\_\_ day of May, 2022

*Warren Turner*

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Gamaliel Warren Turner, Sr.