

**IN THE SUPERIOR COURT OF CHEROKEE COUNTY
STATE OF GEORGIA**

Lori Portillo, Pro Se

Petitioner

CIVIL ACTION
No. 22CVE1890

v.

BRAD RAFFENSPERGER in his
official capacity as the Georgia
Secretary of State

CHEROKEE COUNTY GEORGIA
BOARD OF ELECTIONS
ALAN SHINALL
MIKE BYRD
RACHEL KINSEY
CINDY COSTELLO
DONALD SAMS

Respondents

_____)

AFFIDAVIT

STATE OF GEORGIA
COUNTY OF CHEROKEE

PERSONALLY appeared before me, the undersigned authority in and for said county and state, LORI PORTILLO, who, having been being first duly sworn by the undersigned Notary Public, deposes and says:

1. I am the Petitioner in the above-described action, and make this Affidavit in support of my Petition for issuance of a Temporary Restraining Order without notice to Respondents in this action.

2. This action seeks to restrain and enjoin Respondents from using electronic voting systems that have been proven to abridge Petitioner's right to vote, right of free speech, right of equal protection and right of due process.

3. Unless I am granted the requested relief, I will suffer immediate, irreparable harm, in that my vote may not be counted as cast. This is irreparable harm insofar as no adequate compensation by monetary damages or any award of future damages would adequately compensate for the loss of my vote or for my vote to not be counted as cast. My vote not being counted as cast, or not counted at all, is a harm that no measurable monetary compensation can cure or reverse.

4. The use of the electronic voting system currently available in Cherokee County Georgia has proven defects that allow for votes to not be counted as cast. This is a violation of the First, Fourteenth and Twenty Sixth Amendments of the US Constitution, Articles I, Section I, Paragraphs I, II, and VII, Article II, Section I, Paragraphs I and II, of the Georgia Constitution, as well as various Federal and State statutes. Constitutional violations are recognized as triggering irreparable harm unless they are promptly remedied.


5. Restraining the use of the electronic voting system in Cherokee County Georgia will not cause damage to the opposing party as Georgia law requires paper ballots to be available for every registered voter for every election.

Therefore, no additional expense would be incurred. In actuality, it would probably save money.

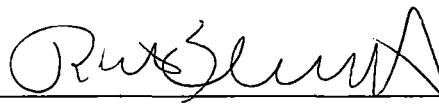
6. Restraining the use of the electronic voting system in Cherokee County Georgia would not be adverse to the public interest. On the contrary, it would be in the public's interest to ensure all votes cast are counted as intended.

7. Due to the above stated facts of imminent and irreparable harm, for which I have no adequate remedy at law, a Temporary Restraining Order without requirement of prior notice to Respondents is necessary.

Witness my signature this the 28th day of October, 2022


Lori Portillo

SWORN to and subscribed before me this the 28 day of October, 2022


NOTARY PUBLIC

My Commission Expires

06/10/2024

