

IN THE SUPERIOR COURT OF MORGAN COUNTY, GA
STATE OF GEORGIA

FILED
2022 OCT 28 AM 11:25

JODY M. HIGDON, CLERK
SUPERIOR-JUVENILE COURT

LORI TULLOS, Pro Se
VIRGINIA S. MCFADDIN, Pro Se

BY *Judy Tarpley*

Petitioners

CIVIL ACTION
No. 2022SUCA193

v.

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

MORGAN COUNTY GEORGIA
BOARD OF ELECTIONS and
REGISTRATION
JENNIFER DORAN, Director
Dr JAMES WOODARD, Chairman
BARRY BROADMAX, Member
TIM CARTER, Member
MARY KAY CLYBURN, Member
KIRBY HAYES, Member

Respondents

AFFIDAVIT

STATE OF GEORGIA
COUNTY OF MORGAN

PERSONALLY appeared before me, the undersigned authority in and for said
county and state, LORI TULLOS, 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 Morgan 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 Morgan 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 Morgan 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 20th day of October, 2022



Lori Tullos

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



NOTARY PUBLIC

My Commission Expires

