SEVEN HILLS
STRATEGIES

State Election Board Report – Post-Election Executive Summary
January 12, 2021

Introduction

Seven Hills Strategies, LLC (SHS) has been contracted by the State Election Board (SEB) to serve as an independent, non-partisan monitor for the pre-electoral processes in Fulton County leading up to the November 3, 2020 general election and for any subsequent runoffs. SHS will observe absentee ballot request processing procedures, absentee ballot processing/scanning, early voting procedures, and actual ballot counting on Election Day and beyond. The goal of SHS is to ensure that Fulton County is adequately prepared for the scrutiny that they will be subjected to due to the national implications of the election results.

Fulton County's Compliance with the Terms of Sec. 12 of the Consent Order

In addition to this report on compliance with the terms of Consent Order, SHS believes that is necessary to share this observation: From October to January, I spent nearly 270 hours at various locations observing every aspect of Fulton County's election processes. At no time did I ever observe any conduct by Fulton County election officials that involved dishonesty, fraud, or intentional malfeasance. During my weeks of monitoring, I witnessed neither "ballot stuffing" nor "double-counting" nor any other fraudulent conduct that would undermine the validity, fairness, and accuracy of the results published and certified by Fulton County.

A) Absentee Ballot Procedures:

1) Leading up to the Nov. 3 general election, SHS had the opportunity to observe the signature matching processes for absentee ballot applications being processed both at Darnell Senior Center and at Fulton County headquarters. During the runoff, I was stationed at Georgia World Congress Center (GWCC) and was able to monitor the vast majority of signature matching for the weeks leading into the runoff.

   SHS determined the signature matching processes to be in-line with the terms outlined in the Consent Order, and generally erred on the side of "give it further research" when there was any doubt about a signature's authenticity.

   However, although most applications were being processed within 48 hours of being received, SHS found one ballot application at Darnell Senior Center that had been in Fulton's custody for more than two weeks. Given the massive influx of applications and ballots, it is not surprising that a few ballots might be left behind, but Fulton must re-double their efforts in future elections to speed up processing times.

Additionally, SHS received multiple reports of absentee ballots being sent to the wrong addresses, which seems to be the fault of sloppy data entry by staff. Future staff trainings should underscore the importance of correctly entering the temporary/preferred addresses of all ballot applicants.

2) Although Fulton County allocated ample resources for absentee ballot processing leading into the general elections, the processes themselves were extremely sloppy and replete with chain of custody issues as the massive tide of ballots bounced around the Fulton Gov't HQ building.

    The system, created by Ralph Jones, Registration Chief for Fulton County, seemed to function, but there were many processes that seemed to be *ad hoc* solutions to problems caused by a lack of organization or permanent staff with the expertise to manage the system in place. For example, the room which housed the team doing additional voter verification was also a temporary housing location for ballots between the mail room (which receives, opens, and records the numbers of ballots) and the ENET processing room. Staff in this room seemed to not understand the process, and Jones had to intervene to stop a temporary staffer from moving a pile of recently-accepted but unverified absentee ballots into the stack to go straight to State Farm Arena for scanning/counting. Had Jones not been there with me to catch this mistake, it is safe to assume that those ballots would've been counted as if they had been verified.

    I observed an additional security issue here, as one staff member told me that people had not been signing out batches of ballots as they moved around the building in trays between processing rooms, which is a clear failure in the chain of custody mandated by the O.C.G.A.

    Given the inefficiencies of this system and the volume of absentee ballots received, there was no way that Fulton could possibly comply with the mandate to "process all absentee ballots by the close of business on the next business day after the ballot is received."

    Despite the aforementioned deficiencies during the general, Ralph and his team were able to both streamline and improve processes for the Jan. 5 runoff. The Fulton team migrated the entire signature verification process to the facility established at GWCC and for several days even attempted to do the voter credit step on-site before resolving to handle that at Pryor St. before bringing credited ballots to GWCC. Performing the entire process[1] linearly and in full view of the public was a tremendous improvement on the labyrinthine system concocted for the general. In my opinion, Fulton clearly made available sufficient resources to handle the influx of ballots for the Runoff.

---

[1] Voter credit → 1st pass signature verification with ENET → 2nd pass signature verification with RocketFile → Return RocketFile rejects to Pryor St for curing

3) SHS has not yet been able to conduct an audit to graphically represent the rate at which absentee ballots were scanned for the general election; however, my research indicates that the staff was able to scan fewer than 80,000 ballots in the period leading up to Nov. 3. Judging by final absentee/UOCAVA numbers (approx. 147k), in the 72 hours from 11/3 to 11/5, the staff were able to scan nearly 80 percent (approx. 67k) of that which they had scanned in the previous two weeks. Regardless of whether the bottleneck was in receiving the ballots, verifying the signatures, opening the ballots or scanning them, this rapid acceleration in scanning rate indicates that Fulton failed to adequately utilize the pre-scanning period allowed by SEB Emergency Rule 183-1-14-0.9-.15.

The runoff, however, was a stark dichotomy and a comparative great success. With the eyes of the world watching, Fulton was able to report 106,117 absentee votes (the vast majority) on Election Day itself due to the diligent pre-scanning work by Fulton staff. By the time that the operation was closed at 2 a.m., Fulton had fewer than 5,000 absentee ballots left to process. This small remainder – all received from ballot drop boxes on the evening of Jan. 5 – is a testament to how hard the Fulton team worked to comply with this item in the Consent Order.

4) Based upon a conversation with Captain M. McHugh, Fulton County Police Department, regarding the security protocols installed to ensure the protection of ballot drop boxes, I am confident that Fulton's robust security architecture made it impossible to tamper with votes at ballot drop boxes.

Given the daily influx of new ballots to the GWCC facility, I believe that ballots were, in fact, collected each day as required by SEB Emergency Rule 183-1-14-0.8-.14. On Election Day, multiple shipments of drop box ballots were received at GWCC (one at 4:38 p.m. and another at 11:30 p.m.) after first being checked-in at the Pryor St. mail room. As far as I witnessed, Fulton fully complied with this item of the Consent Order.

B) Poll Workers and Poll Worker Training:

1) Fulton greatly exceeded the target number (2,200) of poll workers required for both the November and January elections. Fulton enlisted so many poll workers to account for any potential emergencies, attrition, or no-shows on Election Day.[2]

Indicator	Target	Poll Workers Assigned (Nov.)	Poll Workers Assigned (Jan.)
Dual Manager		81	81
Manager		174	174
Assistant Manager		510	510
Line Manager		558	525
Clerk		2,420	1,495

---

[2] N.B. This point also covers Section 12.B.4 of the Consent Order

Deputy Registrar Clerk		255	155
Provisional		30	17
Total	**2,200 + 560 alts.**	**4,028**	**2,957**

2) On October 28, 2020, SHS attended the four-hour Fulton County poll worker training at the North Annex Service Center. This training accurately and concisely reviewed all voting implementation procedures, how to use Poll Pads and other hardware, and the test at the end ensured that workers had actually learned the content.

A particular importance was placed on securing election materials and ensuring that all zip ties and numbered seal stickers are appropriately installed and recorded at the beginning and end of each day. In accordance with O.C.G.A Code, verifying the zero-count in the morning and recording the final count at the end of the day were also underscored, though there was no emphasis placed on the need to dually-sign these count receipts. Additionally, the trainer underscored processes for keeping voting open despite technological issues, stating that, "you can open the polls with one poll pad, one BMD, and one scanner; if you are not able to open at 7a.m., immediately contact Fulton County and see if you need to fall back to provisional ballots." The trainer also frequently repeated that "we do not turn voters away" to encourage poll workers to find a workable solution to any problems that may arise.

The sole training deficit that I recognized was regarding the Senate District 39 Special Election. While it was somewhat odd that a primary election would be taking place during a general election, this lack of knowledge was a failure to adequately train the trainers regarding this special election. This lack of knowledge was passed on to poll workers, which resulted in numerous complaints to SHS about a failure to offer voters the opportunity to participate in this special election.

3) Fulton was to provide the SEB with weekly updates on total poll officers and alternates, training, and allocation plan of poll officers to polling places, including contingency plan for alternate poll officers for the November election, as well as any runoff election in this election cycle. As these reports did not come to SHS, I cannot comment on this item.

C) Advance Voting Locations:

1) Fulton was required to have 24 early voting locations, but greatly exceeded this requirement in both the general and runoff elections.

Indicator	Target	General	Runoff
Early Voting Locations	24	30 + 2 mobile + 7 outreach sites	30 + 2 mobile + 2 outreach sites

Both Fulton staff and poll workers could have done a better job ensuring that ENET records were kept up to date. Failure to keep accurate records of whether a voter had voted yet led to a great deal of confusion at the polls during both the general and the runoff as well as concerns of widespread voter fraud. Some human error is to be expected, but Fulton must strive to reduce the number of these instances.

D) Election Day Logistics and Polling Locations:

1&2) Fulton was required to have 255 voting locations for Election Day, and met this requirement in both the general and runoff elections. It is also worth noting that Fulton established 91 new polling locations for this election cycle to meet this goal.

Indicator	Target	General	Runoff
Election Day Voting Locations	255	255	254

3) Fulton was to provide the SOS with their plan for Election Day distribution of election equipment and poll officers no later than October 2, 2020. As these plans did not come to SHS, I cannot comment on this item.

4) On October 29, Rick Barron shared early voting turnout data with the Gabriel Sterling, Chris Harvey, and Blake Evans from the SOS' office. Sterling ran the modeling through MIT's Election Data Lab allocation tool, and shared the results with Barron. Complying with this term of the Consent Order, Barron then re-programmed Poll Pads and redirected election materials to buttress any weaknesses revealed by the data model.

5) At no point during either the general or runoff did any polling unit run out of emergency/provisional paper ballots, paper backup pollbooks, or required forms. In January, three polling units (all served as both early voting and Election Day locations) received re-supply from headquarters but never ran out of materials.

6) During the general election, Barron negotiated with the ACLU to provide 255 deputy registrars to use ENET to cancel absentee ballots. During the runoff, this task was performed mainly by a smaller number of non-ACLU deputy registrars. SHS received no complaints during the runoff about unnecessary wait times related to not having additional dedicated deputy registrars.

7) Fulton established three call centers with a combined staff of more than 100 people to answer questions from poll managers during Nov. 3 and Jan. 5. My poll worker training encouraged me to call the hotline if any problems arose while voters were casting their ballots.

8) After 9:30 a.m. on Nov. 3, no polling precincts in Fulton County had a wait time greater than 30 minutes. The same was true for the entirety of voting on Jan. 5. Both of these should be seen as tremendous victories for the Fulton team, as they had allocated sufficient staff,

resources, and procedures to ensure that all voters were able to cast their ballots quickly regardless of where they lived in the county.

E) Technical Support:

1) Fulton trained 255 technicians for the general election, and additionally ensured that each early voting site also had a dedicated tech aside from State Farm Arena, which had five techs on-hand to manage their large number of BMDs. For January, Fulton trained 254 technical support experts, but 22 did not report for work on Election Day for one reason or another.

F) Audit Preparation:

1) Fulton's document retention processes at State Farm were adequate for protecting ballots from tampering and the system of marking boxes with scanner number, batch number, and date made it much easier to process during the forthcoming audit and recount.

2) Risk-Limiting Audit (RLA)

- The scale to which Fulton prepared for the RLA was staggering. With a maximum of 174 teams of two processing ballots by-hand, Fulton completed the RLA more quickly and accurately than anyone had anticipated. It is a testament to the team's leadership that they were able to keep feeding the processors while keeping accurate records.

3) Recount

- As with the RLA, Fulton aggressively tackled the Recount and initially seemed as if they would complete their recount more quickly than estimated. However, failure to comply with approved technological procedures led to a server crash and significant, costly delays that required the Fulton team to completely rescan all ballots once again. Additionally, during the fourth count (the second lap of the recount), sloppy document storage procedures led to confusion as box labels no longer had precinct names and batch numbers on them but instead all said "ELECTION DAY." This mistake therefore made it difficult to ascertain which ballots had been missed while trying to solve the second technical issue that resulted from accidentally naming two scanners "ICC 16" during the fourth count. Until this point, proper ballot handling, storage, and manifest procedures had been observed.

Appendices

SEVEN HILLS STRATEGIES

<h1 style="color:red; text-align:center">State Election Board Report</h1>

<h1 style="color:red; text-align:center">Appendix A - Challenges and Recommendations from the Entire 2020 Election Cycle</h1>

I.   The Pre-Election Period

- COVID-19 preparedness was obviously on the forefront of Barron's mind. He and his team had taken a multitude of steps to ensure that everyone was safely fulfilling all required duties in the lead-up to Election Day, but the virus had taken a heavy toll on the permanent staff leading the warehouse team. This caused several pivots and logistical changes to protect the staff, but there was still concern that a team of new players would be able to handle the tremendous workload as seamlessly as the high stakes of this election required. SHS learned that the SOS office offered vendor support to mitigate the breadth of the COVID outbreak, but this was offer was declined by Fulton.

- SHS received multiple reports that Fulton was slow to update MVP and give voters credit for having voted by absentee ballot (both mailed in and deposited in a drop box). It was imperative that - as the Consent Order mandates - the BRE keep accurate and up-to-date records about who has voted in the publicly-visible portals lest they face double voting problems. Reports have shown that this problem has affected both absentee and early voters, so the problem was bordering on systemic.

- Additional training should be done regarding O.C.G.A. § 21-2-381(a)(1)(A-G) pertaining to relatives or helpers filling out the absentee ballot for their temporarily out of state, disabled, or elderly voters. SHS witnessed multiple staff having difficulty deciding how best to handle family members and helpers requesting absentee ballots for others.

- SHS has received a multitude of reports of absentee ballots being sent to wrong addresses even though alternate/secondary addresses were provided or already on file. One notable case being from a servicemember currently serving out-of-state who felt disenfranchised by Fulton's inability to properly process his absentee ballot request. As witnessed at the Darnell Senior Center, the data entry for processing absentee ballot requests can be burdensome, but each entry much be triple-checked for accuracy to avoid careless mistakes like this.

- On 10/23, SHS saw one absentee ballot request dated 10/07. While this was a lone outlier and the vast majority of the ballot requests seen were dated 10/21, Fulton must ensure that all absentee ballot requests are processed in a timely manner.

- In his press conference on 10/22, Barron stated that there was no wait time difference between the early voting locations in the north and south parts of the county; however, anecdotal accounts have said that there have been long wait times in the Alpharetta/Johns Creek parts of the county.

- The Senate District 39 special election was a persistent problem. As witnessed during SHS' poll worker training, there was a failure in the protocol for the training of trainers

that should be corrected in the event that this occurs in the future. This failure to adequately prepare trainers regarding this special election led to a countless number of voters not being able to participate in this election. SHS suggests that to fix this, Fulton consider pivoting to an "opt out" instead of an "opt in" policy for these types of elections so that all voters may participate regardless of whether or not they are aware of the race.

- There were myriad problems with the absentee processing system at Fulton Government Headquarters, including:

    o Failure of staff to understand the process of moving ballots around the office
    o No chain of custody forms being used as ballots move from room to room
    o Mask-optional policy putting essential staff at unnecessary risk for COVID
    o Failure to sufficiently protect spoiled and rejected ballots in the mail room

- While touring the mail room at Fulton County Government Headquarters, SHS saw many ballots set to be cancelled because they were returned to drop boxes without the yellow exterior oath envelope. It should be stressed more clearly to voters that they must precisely follow all the instructions on the absentee ballots and return both envelopes if they want their vote to be counted. Since it is impossible to update the MVP of "naked" ballots when they are processed, it is likely that some of the complaints that the SOS office received about a failure to record ballots deposited at drop boxes were due to the fact that voters failed to correctly follow the necessary protocol.

- While there was a large focus on the "Know Before You Go" Campaign and encouraging voters to use the FultonVotes App to notify voters that their precincts may have changed, it is concerning that SHS has received a report that Fulton waited until 5:51pm on October 26 to mail 169,714 postcards notifying voters of changed precincts. SHS received complaints that Fulton was "suddenly changing polling locations without notice." It would have been prudent to send these notifications earlier so that the news did not surprise people already making plans for in-person voting on Election Day.

- On October 29-30, widespread power outages resulting from Tropical Storm Zeta forced seven polling precincts to close on 10/29 and two to stay closed on 10/30. This unanticipated closure surely had a negative impact on turnout numbers as early voting came to an end on 10/30, but there was very little that the BRE could have done to avoid this. In fact, it seems that they handled the crisis well by deploying the two mobile voting centers to the downed precincts to help manage the flow of voters.

- On October 26, the ACLU raised concern that the Fulton office was sitting on 1,500 voter registrations that for all intents and purposes seemed to voters to have gone missing. It took two days before SHS was able to get an update from Ralph Jones, who said that there were indeed 1,500 remaining voter registrations awaiting processing and that they would be finished by the end of 10/28. This is cutting it far too close to actual Election Day for new voters who are likely unsure of the process. These voter registrations should have been processed weeks ago.

- It was brought to the attention of SHS that Fulton has been using an outdated version of Easy Vote to check in voters and keep ENET records up to date. All software used must be updated to benefit from the latest bug and security patches.

- Fulton has leaned very heavily upon an army of temporary workers to fulfill the litany of tasks that must be completed from logistics to processing ballots to scanning final results. It would perhaps be best to offset this number of workers with stakeholders from the local community who would like to get involved in the electoral process. By conducting multiple interviews with temporary staff, it was made clear that some have no keen interest in participating in this immensely-important process, which is perhaps to blame for some of the sloppy clerical errors and logistical shortcomings that have plagued the complicated electoral process. However, others (particularly those scanning at State Farm) are the glue that holds the entire process together. It is the opinion of SHS that several of these leaders should be hired full-time if the budget allows.

II.   The General Election

- The 4-BMD unit transporters are not ADA-compliant if used for duplicating ballots. People must stand for hours to duplicate and the screens are too tall to sit and operate. One of the Fulton staff has a bad knee and uses a cane. She was saying that her knee was hurting but she needed to keep working.

- The truth about what happened on the night of November 3rd between 10:30PM and 11:52PM continues to be elusive. GOP party poll watchers say that Fulton staff told them and the media to go home (implying that they did so in order to count without supervision). Fulton staff tell me that the poll watchers and the media just left when Moss sent home everyone but the scanner team. A SOS investigator is involved, so the truth will come out, but if the party poll watchers are correct, then there is a serious problem.

- There were persistent chain of custody issues throughout the entire absentee ballot processing system. Aside from the problems with the system at Pryor St (see executive summary report), the fact that ballots were being delivered to State Farm Arena in unsecured mail carts is very concerning. Protocol for securing ballots exists not only to protect the ballots themselves but also to ensure that no ballot box stuffing occurred. This problem was exacerbated by poor managerial processes by Ralph Jones, who failed to do intake counts for the provisional ballots. Similar problems seem to exist at the warehouse as well (e.g. poll pads for SC11). Fulton must bolster these processes to retain faith in their process.

- The entirety of events on Saturday, Nov. 7 was plagued by the mismanagement issues. If there had been a clear process on Friday, then perhaps that mess may have been avoided, but the fact that no one verified the number of provisional ballots either at intake at State Farm or at adjudication is concerning. Therefore, there was a possibility that 1) not all provisional ballots made it to State Farm or that 2) some were missing because they never did an intake count. It turned out that both were true. If Santé had not gone back into the

office to look up her file on provisional ballots, what would have happened to the 17 ballots that remained at Pryor St?

- The process for equipment delivery at the warehouse is in desperate need of an overhaul. SHS concurs with Barron that a digital check-in/out system would make the logistical job much smoother. Monday evening was far too chaotic for an operation of that size, and in the disorder, many mistakes were made that just caused more trouble for a team that was already underwater. As a result, SHS has received multiple complaints about a lack of sufficient numbers of ballot bags making it to precincts, which led to a chain of custody issue before tabulation. Additionally, SHS caught wind of missing CFs (e.g. Palmetto) after Election Day that had likely been misplaced due to inadequate check-in processes.

    o Furthermore, if Fulton implements a new digital system, it must be used by both the poll managers and the Fulton staff. The fact that a poll tech was able to show me that 157 polls were still "open" in Fulton's backend demonstrates that they were simply not utilizing a tool that they either developed or purchased. Working partially from two systems is a fantastic way to forget mission critical materials.

- Staff not using correct terminology caused confusion on multiple instances, including for this monitor attempting to audit Fulton's data. In pre-election reports, Fulton reported that they had "processed and scanned" 127k ballots. The term "processed" was used multiple times and by different teams, which indicates organizational silos and led to confusion because SHS thought that "scanned" meant literally scanned instead of having the barcode read and processed through MVP. In actuality, few ballots had actually been scanned in the pre-election period.

    o This same problem was evident when a staffer told SHS that ballots had been "found" instead of "cured." It is a distinction with dire consequences.

- The entire Fulton team must be more aware of the optics of their actions in such a high-scrutiny environment. It was a judgment call, but I still think that bringing ballots in through the back door on 11/5 was the wrong call for transparency purposes. It would have ignited a media firestorm if the Fulton team had not immediately held a press conference afterward. By far the worst maneuver for optics occurred on Saturday in using the OPEX cutters to count ballots. Aside from being slower than counting by hand, this gave the impression to everyone (myself included) that they had found more ballots after the deadline. I personally had to talk to the media and the party poll watchers, who were all understandably concerned by what was appearing to happen, to tell them that those were empty ballots being counted.

- In the "Provisional Ballot Recap Notice," Fulton stated that 1,205 people were "Not found in Express Poll, researched and found to be registered in Fulton County, U.S. Citizens, and ballot not challenged." Why were that many people not in the Fulton system and required to vote provisional?

- The OPEX scanners require constant re-calibration. The machines being out of calibration and failing to operate properly generated more work for workers that were

already exhausted and stretched thin. Fulton should either insist that OPEX techs remain available for service calls during election crunch time or dispatch a large number of letter openers to vote processing centers as a backup plan for the inevitable failure of the technology.

III. The Risk-Limiting Audit

- There were persistent chain of custody issues throughout the entire RLA process. From ballots being left unattended in front of party audit monitors to unsealed bags being transported for storage to zip tie seals being left unattended to not recording the seal numbers placed on the ballot bags, Fulton's system is plagued with these procedural issues. They must strengthen their chain of custody systems to follow the strict guidance in the O.C.G.A. code given the (inter)national significance of the processes happening here.

- Additionally, regarding proper seals, Fulton staff complained that the stickers provided by the Secretary of State's office for sealing cardboard boxes do not stick to tape and cardboard. I even noticed a few that had just fallen off boxes of absentee ballots. Would it be possible to change vendors for these stickers and provide counties with something more robust?

- Transparency is of utmost importance, and the party audit monitors are completely necessary, but the parties must strengthen their vetting procedures for their monitors, train them on the process they are observing, and brief them on their roles. Furthermore, it is my suggestion that repeat offenders who show a frequent disregard for the rules should be barred from serving as monitors again.

- Fulton was initially slow to report their numbers into Arlo because they only had one login. Then, to catch up they overcompensated and assigned too many staff to work on data entry. Is it possible to split the difference and provide Fulton (and the other large population counties) with more Arlo logins from the beginning? Fulton leaders were complaining that they should have more than the one they were initially assigned so that they could better manage the workload.

- There was a clear training deficit for auditors working through the new audit process. For future RLAs, additional guidance should be provided about how/when to use the manila envelopes, what constitutes clear voter intent (checkmarks, bubbles, or x's), and large number batch counting best practices to remove as much confusion as possible from the audit process.

- Following the procedure detailed in the training video, audit teams quickly ran out of envelopes for write-ins, under-votes, undecideds, etc. It is imperative that the Fulton team have a back-up supply of these envelopes for the next RLA so that their team does not have to scramble to help those working according to official procedure.

- Some of the precinct batches (particularly for early voting) were massive (3,500+), which increase human error due to fatigue as well as call into question the policies regarding leaving the audit table for necessary bathroom and food breaks. Is it possible to split batches larger than 1,500 to mitigate these issues if proper ballot manifests are kept?

III. The Recount

- Cardboard seems to be an insufficient storage method for document retention. Glancing at the boxes, it is clear to see that many of them have been crushed by the weight of the other boxes on the pallets upon which they were loaded. Additionally, the leak at State Farm Arena – though certainly anomalous – revealed the necessity for a more robust and potentially waterproof system for document retention. SHS recommends using plastic storage bins instead of cardboard for future election cycles.

- Generally poor records keeping led to a multitude of procedural problems for Fulton throughout the recount process. The poor managerial decision at the Fulton warehouse to reclaim ballot bags for then-upcoming December runoff and mix ballots of different types (e.g. early voting and Election Day) together for "deep storage" required additional rounds of scanning during the recount because the wrong ballots were scanned on two separate occasions.
  - In contravention to what they had done on Count 3 (during which they labelled all Election Day boxes with the precinct numbers on outer labels), all of Count 4's Election Day ballots were simply being placed in boxes marked "ELECTION DAY" but with no precinct information visible on the outside. This became a problem later when they had to retrieve particular batches because they had been overlooked during scanning. This may have produced a chain of custody issue at the end as two Fulton leaders were sending out individual ballot batches instead of full boxes to make sure that each batch contained only Election Day ballots as expected. They were careful to correctly complete the coversheets for each batch, but it would not be difficult for a batch to be forgotten or fall to the wayside as it changed hands.

- Transparency is of utmost importance, and the party monitors are completely necessary, but the parties must strengthen their vetting procedures for their monitors, train them on the process they are observing, and brief them on their roles. Furthermore, it is my suggestion that repeat offenders who show a frequent disregard for the rules should be barred from serving as monitors again. Throughout the time at GWCC, the party monitors flagrantly disobeyed guidance from Fulton staff and GWCC police regarding the mask policy and taking photos/videos of the procedure. One monitor even yelled, "THIS IS TREASON UNDER PENALTY OF DEATH!" in the face of a Fulton manager who was simply trying to check his party monitor credential – which he turned out to not have – for sign-in.

- SHS had received reports of several unsealed ballot bags, and hunted down the bag numbers to investigate. SHS found four unsealed ballot bags that were clearly marked

with zero counts on the exterior labels. For future best practices, it is encouraged that staff seal every ballot bag regardless if it's empty to mitigate accusations of "magic ballots" appearing from thin air. Additionally, if ballot bins are empty, it is a good idea to place the tops in them so that it is clear to monitors that the box is empty and is not an unsealed ballot bin.

- Technological issues abounded during the recount. The server crash on November 29 was a costly error caused by a failure to properly follow protocols for backing up and uploading data to the servers. This mistake cost Fulton taxpayers several days' worth of staff time as the entirety of the ballots had to be rescanned for a fourth time. Additionally, the small typographical mistake of accidentally naming two scanners "ICC16" on the fourth count led to a great deal of confusion and another full day of staff time for solving the problem. Fulton technological team must work more slowly, carefully, and in accordance with all protocol to ensure that these mistakes do not happen in the future.

V.   The Runoff Election

- When it comes to communicating with monitors, it is encouraged to keep comments short and to the point without much editorialization. Early in runoff proceedings, Ralph Jones had a good faith conversation with several GOP monitors, one of which had declined to sign the sheet that said he would not record in the processing center. It turned out that that gentleman refused to sign because he was, in fact, wearing a recording device, and recorded Jones' answers to his question without Jones' knowledge. These monitors then submitted an eight page complaint to the SOS quoting long passages from their nearly 45 minute conversation.

- Monitors were very concerned about compact flash memory cards being left in scanners in the L&A side of the warehouse. Additional training regarding election security protocol is required to mitigate alarmist fears that these memory cards are arriving at precincts pre-loaded with votes.

- Parties must fully brief monitors on their role and the appropriate limit of their duties. Multiple monitors told me that they had been recording the license plates of the staff that parked in the deck as well as on the L&A side of the warehouse as "evidence." This seems like a massive invasion of the privacy of the election workers. It is recommended that Fulton County put pressure on the county wings of political parties to have greater accountability for the actions of the people to whom they provide monitoring credentials.

- Fulton was having an accuracy problem due to the data entry required to verify the signatures on received ballot envelopes. In order to improve both speed and accuracy it is recommended that Fulton provide barcode scanners to all signature verifiers in the future. These scanners allow workers to go directly to the correct voter page in ENET without worrying about typographical errors. This system was deployed with great success during the second half of the runoff.

- Fulton staff must be careful to accurately enter data into ENET. SHS received several reports of voters receiving multiple absentee ballots (N.B. not ballot applications) during the runoff. Additionally, there were widespread stories of voters showing up at the polls and being told that they had already voted. Taking voters' claims of not having voted at face-value and as the entire system is built to catch double voting, the only logical explanation for this problem is that an election worker incorrectly pulled voter information in ENET at some point. Extra training on ENET accuracy must be conducted in future elections.

- While I vehemently disagree with the assertion that proximity is tantamount to transparency, it would have alleviated a great deal of stress on Election Day if Fulton had initially provided more access to the party monitors. The floor was set up to allow more access, but the potential of the "cattle calls" was not utilized until it became a necessity. Additionally, SHS suggested that the blue barriers be removed from the UOCAVA duplication station on 12/30, but my suggestion was not followed for the worthy cause of ballot security. Unfortunately, the perceived lack of transparency led to a court order that immensely disrupted Election Day processes. If Fulton had more actively allowed monitors to approach election processes, then it would have been easier for them to see that Fulton had absolutely nothing to hide. The resultant overcompensating backlash left many staff fearing for their personal safety due to monitors violating the photography rules, staff receiving threats on social media, and astoundingly poor mask hygiene by monitors. Furthermore, the increased access to the ballot cage generated a considerable ballot security concern due to the proximity of partisan monitors to ballots being processed.

- A persistent impediment to continued processing was the rate at which ballots were transported from Pryor St to GWCC. While most days that can be attributed to sending all ballots that they had received, on Election Day there must be a faster turnaround. Though three ballot bins had been delivered at 7:04PM, it was not until 11:30PM on Jan. 5 that five bins arrived at GWCC from the 7pm collection of ballot drop boxes. At that point most of the election staff had already gone home due to a lack work, but the massive tide of ballots to be processed made it impossible to finish processing in its entirety on election night. If the Fulton team had dispatched the ballots sooner – even in smaller batches – then perhaps everything could have been finalized on Election Day.

  This same problem was repeated on Friday, Jan. 8. The tremendous GWCC team had waited all day for provisional ballots to arrive from Pryor St, but it was not until 3:47PM that four ballot bins were delivered. A large portion of the staff clocked out at 4:30PM, but the remaining team was left working until 8:15PM to handle the workload while shorthanded. This could have been mitigated by sending smaller batches of ballots as they became available.