

BEFORE THE STATE ELECTION BOARD
STATE OF GEORGIA

IN THE MATTER OF:

True the Vote

Complainant

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SEB Case No. 2022-003

SUBPOENA TO TESTIFY AT A DEPOSITION

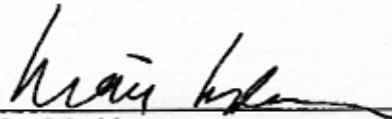
TO: Catherine Englebrecht
c/o: Brock Ackers Esq, Registered Agent
3401 Allen Parkway, Suite 101
Houston, TX 77019

YOU ARE HEREBY COMMANDED AND DIRECTED, pursuant to O.C.G.A. § 21-2-33, to sit for a deposition under oath regarding an ongoing State Election Board investigation on May 26th, 2022 or such other time that is mutually agreeable. You have been identified as a witness who has information concerning the November 30, 2021 complaint submitted by True the Vote regarding allegations of ballot harvesting in Georgia in the 2020 election. If they have not already been provided to the Secretary of State's office, you are further commanded and directed pursuant to O.C.G.A. § 21-2-33 to bring the documents described in **Exhibit A** to such deposition.

Should you have any questions, please contact **Ryan Germany, General Counsel for the Office of the Secretary of State, at 678-672-9230.**

In case of refusal to obey a subpoena issued to any person pursuant to O.C.G.A. § 21-2-33, a superior court of appropriate jurisdiction, upon application by the State Election, may issue to the person any order requiring him to appear before the court to show cause why he should not be held in contempt for refusal to obey the subpoena. Failure to obey a subpoena may be punished by the court as contempt of court.

HEREIN FAIL NOT UNDER PENALTY OF LAW, this 21st day of April 2022.



Matt Mashburn
Acting Chairperson, State Election Board

Exhibit A

1. The “detailed account of coordinated efforts to collect and deposit ballots in drop boxes across metro Atlanta” referenced in True the Vote’s November 30, 2021 complaint submitted to the Georgia Secretary of State (“Complaint”), including any recordings, transcripts, summaries, testimony, statements, witness interviews, notes, or other documents describing such account, including the identities and contact information for the people who gave such detailed account.
2. The identity and contact information of the “several individuals regarding personal knowledge, methods, and organizations involved in ballot trafficking in Georgia” referenced in the Complaint and any recordings, transcripts, summaries, testimony, statements, witness interviews, notes or other documents describing what those individuals said.
3. The identity and contact information of the “contracted team of researchers and investigators” referenced in the Complaint and any recordings, transcripts, testimonies, statements, summaries, witness interviews, notes, or other documents evidencing what the “several individuals regarding personal knowledge, methods, and organizations involved in ballot trafficking in Georgia” told those researchers and investigators.
4. The identity and contact information for John Doe referenced in Complaint and any recordings, transcripts, testimonies, statements, summaries, witness interviews, notes, or other documents evidencing all statements John Doe made regarding his alleged participation in ballot harvesting in Georgia.
5. The identity and contact information for John Doe’s mother and any recordings, transcripts, testimonies, statements, summaries, witness interviews, notes or other documents evidencing statements she made regarding ballot harvesting in Georgia.
6. Any recordings, transcripts, voicemails, summaries, notes, or other documents from True the Vote’s Georgia Election Integrity Hotline, tip line, or other hotline regarding allegations of ballot harvesting in Georgia.
7. Any receipts, invoices, bills, or other documents evidencing any medical payments you made for the John Doe referenced in the Complaint.
8. The identities of the “network of non-governmental organizations that worked together to facilitate a ballot trafficking scheme in Georgia” that John Doe allegedly described and any recordings, transcripts, testimonies, statements, summaries, witness interviews, notes, or other documents evidencing those statements.
9. The identities of the “ten hubs” in Atlanta that you allege participated in a ballot harvesting scheme in Georgia.
10. The identity and contact information for the “bartender who came in from South Carolina” to help with the alleged ballot harvesting scheme in Georgia and any recordings, transcripts, testimonies, statements, summaries, witness interviews, notes or other documents supporting this allegation.
11. Any Non-disclosure agreements or confidentiality agreements you are relying on to withhold the disclosure of any documents or information being requested by this subpoena.