

**To the Members of the Georgia State Election Board,**

**I submit this formal complaint requesting investigation and remedial action regarding Fulton County’s handling of ImageCast Precinct (ICP) tabulators, CompactFlash (CF) memory cards, ballot custody, and Election Management System (EMS) ingestion records during the 2020 General Election. This complaint is based on Dominion Voting Systems procurement representations, Georgia Elections Division directives, public admissions by Fulton County officials, contemporaneous video evidence, and analysis of Fulton County’s EMS “Batches Loaded Report.”**

### **Executive Summary**

**This complaint documents material non-compliance by Fulton County with Georgia’s certified election procedures during early voting in the 2020 General Election, specifically involving Dominion ImageCast Precinct (ICP) tabulators, CompactFlash (CF) memory cards, ballot custody, Election Management System (EMS) recordkeeping and HAVA compliance.**

**Georgia’s procurement materials, including the State’s Master Solution Contract, expressly required that ImageCast Precinct (ICP) tabulators operate using 8GB CompactFlash media. Dominion’s Request for Information (RFI) reflected this requirement, stating a ballot-image capacity of approximately 13,000 ballots based on the most storage-intensive configuration—double-sided 20-inch paper ballots. Georgia’s procurement and certification decisions were premised on that worst-case ballot format. Dominion’s technical documentation further establishes that ballot-image capacity substantially exceeds this figure for less storage-intensive formats, specifying that ICP tabulators can store up to a maximum 29,000 ballot images on 8GB CompactFlash media when processing single-sided ballots. Because Georgia early voting utilized single-page, single-sided QR-code ballots produced by ballot-marking devices, the reported 5,000-ballot testing limit and 3,000-ballot swap-out threshold are inconsistent with the Master Solution Contract, the assumptions underlying the RFI, and Dominion’s published system specifications.**

**In practice, however, Georgia Elections Division Director Chris Harvey publicly stated a substantially lower operational capacity of approximately 10,000 ballots, and Fulton County subsequently reported that testing demonstrated capacity limits of approximately 5,000 ballots. Based on those test results, counties were directed to replace CompactFlash cards at approximately 3,000 ballots—less than one quarter of the capacity represented in Dominion’s RFI and far below Georgia’s certified configuration assumptions.**

**Fulton County acknowledged that during early voting it repeatedly replaced CompactFlash memory cards on ICP tabulators due to capacity concerns, without adding or replacing tabulators. County officials stated that approximately 36 memory-card replacements occurred, and that several cards exceeded approximately 3,000 ballots prior to replacement. Contemporaneous Election Night video evidence further confirms that 4GB Dominion-branded CompactFlash media was in use, directly contradicting Georgia's certified configuration and the assumptions underlying Dominion's original capacity estimates. Quote from Regina Waller, Fulton County Spokesperson:**

**"Due to the amount of races that were on the November 2020 ballot and the large number of early voting polling sites that we have in Fulton County, the Dominion ICX scanner had the memory to hold ballot images of about 5,000 ballots," the official said. "After my staff and I did the test to confirm that the max was 5,000 ballots, we consulted upper management and made the determination that we would swap out memory cards at 3,000 ballots. We swapped out memory cards 36 times during the early voting period."**

**Under an October 27, 2020 Official Election Bulletin issued by the Georgia Elections Division, when CompactFlash cards are replaced on an ICP tabulator, the removed cards must be secured as active election media and later processed and closed. The bulletin further requires that ballots be removed from the ballot box at the time of memory-card replacement to clearly delineate ballots scanned under different cards. Each CompactFlash card—and each resulting ballot batch—therefore constitutes a distinct election record requiring independent custody, tracking, and EMS processing.**

**Dominion's EMS architecture reinforces this requirement. EMS preserves auditability by grouping results first by logical tabulator, then by batch sequence within that logical tabulator. Ballot totals accumulate continuously within a single logical tabulator and cannot be reset or segmented without creating a new logical tabulator identity. Accordingly, when CompactFlash cards are replaced, EMS must reflect a separate logical tabulator or equivalent distinct grouping, producing additional batch-load entries in the EMS record. This is the only mechanism EMS provides to preserve delineation between result sets for audit and reconciliation.**

**A review of Fulton County's EMS Batches Loaded Report—which functions as a time-critical log of CompactFlash media loaded into EMS prior to results being reported through the Results Tallying and Reporting (RTR) application—shows no additional logical tabulators, batch segmentation, or load-entry patterns corresponding to the admitted memory-card replacements. The report identifies 44 early-voting tabulators**

that exceeded approximately 3,000 ballots; however, only two—both mobile voting bus tabulators—appear to reflect swap-out procedures consistent with the issued instructions, while the remaining early-voting tabulators show no corresponding additional EMS ingestions, despite public statements that memory cards were replaced at that threshold. Although two mobile voting bus tabulators were publicly cited as examples of properly administered CompactFlash swap-out procedures, review of the underlying tabulator tapes shows that one reflects only duplicate reporting of the same tabulator identity, while the other reflects result segmentation using a different tabulator ID rather than creation of a new logical tabulator as described in Dominion’s guidance. These records are internally inconsistent and do not demonstrate standardized or compliant CompactFlash swap-out administration. The approximately 11,195 ballots processed through the Mobile Voting Bus tabulators represent a quantity nearly equivalent to the certified statewide margin in Georgia’s 2020 presidential election, rendering the integrity and auditability of these records materially significant.

In plain terms: if a voting machine used more than one CompactFlash card, the EMS should show more than one corresponding entry for that machine. If this occurred approximately 36 times, the EMS should show approximately 36 additional logical entries or batch groupings. Those entries do not appear in the Batches Loaded Report.

Because multiple early-voting ICPs exceeded approximately 3,000 ballots, the admitted memory-card replacement practice implies that approximately 108,000 early-voting ballots were associated with replaced CompactFlash cards. Yet no corresponding EMS load entries, logical tabulator separations, or batch delineations exist to account for those ballots. By way of example, AV-Buckhead Library ICP 3 recorded 7,206 ballots, exceeding both the reported 5,000-ballot tested capacity and the 3,000-ballot swap-out threshold, without any corresponding CompactFlash replacement or EMS delineation. Under the certified 8GB configuration, no swap-out should have been required at all.

Early voting in Georgia concluded on October 30, 2020, while Election Day occurred on November 3, 2020. As a result, any ballots removed from ICP ballot boxes during early-voting memory-card replacement were necessarily accessible for a minimum of four days prior to Election Day. During this period, Georgia’s procedures required those ballots to be stored under documented, secure chain-of-custody controls.

However, although Georgia’s official guidance required removal of ballots from the ballot box during memory-card replacement, no official documentation identifies where those ballots were stored, how they were sealed, who maintained custody, or

how they were later reconciled to EMS batches. No documentation has been produced accounting for the storage, custody, or reconciliation of these ballots during the multi-day pre-Election-Day period.

The EMS record further reflects that Park Place Newtown, an early-voting location, recorded 4,216 ballots but was ingested in the EMS as a non-early-voting (Election Day) precinct, exceeding the 3,000-ballot threshold without any recorded CompactFlash replacement, logical tabulator separation, or reconciliation as early-voting results. When the 44 early-voting tabulators exceeding the 3,000-ballot threshold are considered together with the mis-ingested Park Place Newtown early-voting precinct, the unresolved ballot volume implicated by CompactFlash swap-out and ingestion failures approaches approximately 180,000 ballots.

Taken together, the record reflects:

- Progressive and unexplained degradation of represented ballot capacity (Dominion's Capacity Table 29,000, 13,000+ in the RFI, 10,000 stated, 5,000 tested, 3,000 operational swap-out);
- Operation of voting equipment outside the certified configuration (use of 4GB media instead of specified 8GB);
- Repeated CompactFlash card replacement without creation of new logical tabulators or corresponding EMS load entries;
- Ballot volumes inconsistent with EMS batch records; and
- Undocumented removal and storage of ballots during a multi-day pre-Election-Day period, undermining chain-of-custody and audit completeness.

Because the required system and custody records are missing, the official record cannot demonstrate the disposition of the electronic results or paper ballots associated with the CompactFlash card swap-outs, encompassing approximately 108,000 ballots. The contemporaneous election artefacts—the EMS Batches Loaded Report, tabulator-level ballot counts, and official capacity directives—directly contradict the stated testing results, swap-out procedures, and certified operating assumptions relied upon by Fulton County.

These failures implicate non-compliance with the Help America Vote Act's auditability and record-retention requirements (52 U.S.C. § 21081), as well as Georgia statutes governing certified voting system use, ballot custody, and election record preservation (including O.C.G.A. §§ 21-2-70, 21-2-386, and 21-2-493). They are procedural, material, and independent of intent, and they directly undermine the completeness,

traceability, and auditability of Fulton County's EMS record, warranting investigation and remedial action by the Georgia State Election Board.

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## **I. Scope and Purpose**

This complaint addresses procedural non-compliance by Fulton County during early voting in the 2020 General Election, limited to the operation of Dominion ImageCast Precinct (ICP) tabulators, handling of CompactFlash (CF) memory cards, ballot custody, and Election Management System (EMS) recordkeeping. The issues identified are procedural and documentary in nature and do not allege voter intent or outcome manipulation.

This complaint further addresses whether ballots associated with CompactFlash card replacements were audited, reconciled, and accounted for in the manner publicly stated by election officials. Specifically, when ballots were removed from ICP ballot boxes during memory-card replacement, Fulton County election personnel retained physical access to live voted ballots outside the tabulator and outside any documented, sealed, or logged custody process. During this period, the County therefore had unfettered access to voted ballots without records establishing who handled them, where they were stored, how access was restricted, or how ballot secrecy was protected. As a result, the official record cannot demonstrate compliance with chain-of-custody requirements or preservation of voter ballot secrecy, including protection of how individual voters cast their ballots.

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## **II. Certified Configuration and Capacity Representations**

Georgia's procurement materials and Dominion Voting Systems' Request for Information (RFI) specified that ICP tabulators would operate using 8GB CompactFlash media, with ballot-image storage capacity as per Dominion's Capacity Table at 29,000 ballots per device<sup>1</sup> Georgia's acquisition, certification, and testing decisions relied on these representations.

At no time did Georgia's contracts, certification materials, or pre-election testing authorize routine use of 4GB CompactFlash media or contemplate materially reduced storage capacity. Notably, early-voting ballots in Georgia during the 2020 General Election consisted of single-page QR-code ballots, which should have required

substantially less storage than the ballot format underlying Dominion’s original capacity estimates.<sup>2</sup>

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### **III. Progressive Reduction of Operational Capacity**

Despite the certified configuration and capacity representations:

- Georgia Elections Division Director Chris Harvey publicly stated an operational capacity of approximately 10,000 ballots;<sup>3</sup>
- Fulton County later reported that testing demonstrated failure or instability at approximately 5,000 ballots;<sup>4</sup> and
- Counties were subsequently directed to replace CompactFlash cards at approximately 3,000 ballots.<sup>5</sup>

This progression—from 29,000 capacity of the 8GB to 10,000 stated, to 5,000 tested, to 3,000 operational swap-out—was never reflected in amended certification materials or updated capacity documentation.

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### **IV. Admitted CompactFlash Card Replacement During Early Voting**

Fulton County publicly acknowledged that during early voting it repeatedly replaced CompactFlash memory cards on ICP tabulators due to capacity concerns, without adding or replacing tabulators. County officials stated that approximately 36 CompactFlash card replacements occurred and that several cards exceeded approximately 3,000 ballots prior to replacement.<sup>6</sup>

Contemporaneous Election Night video evidence further confirms the use of 4GB Dominion-branded CompactFlash media, directly contradicting the certified 8GB configuration.<sup>7</sup>

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### **V. Governing Procedures for CompactFlash Replacement**

An October 27, 2020 Official Election Bulletin issued by the Georgia Elections Division governs CompactFlash replacement procedures.<sup>8</sup> The bulletin requires that:

- Removed CompactFlash cards be secured as active election media and later processed and closed;

- Ballots be removed from the ballot box at the time of memory-card replacement to delineate ballots scanned under different cards; and
  - Each CompactFlash card and its associated ballots be treated as a distinct election record, requiring independent custody, tracking, and EMS processing.
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## **VI. EMS Architecture and Audit Requirements**

Dominion’s EMS architecture preserves auditability by grouping results first by logical tabulator, then by batch sequence within that logical tabulator. Ballot totals accumulate continuously within a single logical tabulator and cannot be reset or segmented without creating a new logical tabulator identity.<sup>9</sup>

EMS provides no alternative mechanism to delineate results from separate CompactFlash cards. Accordingly, when CompactFlash cards are replaced, EMS must reflect a separate logical tabulator or equivalent distinct grouping, producing additional batch-load entries. This is the only method EMS provides to preserve audit and reconciliation boundaries.<sup>10</sup>

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## **VII. EMS Record Review and Contradictions**

A review of Fulton County’s EMS Batches Loaded Report—the time-critical log of CompactFlash media ingested into EMS prior to results being reported through the Results Tallying and Reporting (RTR) application—shows:

- No additional logical tabulators corresponding to admitted CompactFlash replacements;
- No batch segmentation reflecting card replacement events; and
- No additional EMS load entries consistent with the stated swap-out threshold.

The report identifies 44 early-voting tabulators that exceeded approximately 3,000 ballots. Only two tabulators—both mobile voting bus units—appear to reflect swap-out procedures consistent with the issued instructions. The remaining early-voting tabulators show no corresponding additional EMS ingestions, despite public statements that CompactFlash cards were replaced at that threshold.

In plain terms: if a voting machine used more than one CompactFlash card, EMS should show more than one corresponding entry. If this occurred approximately 36

times, EMS should show approximately 36 additional logical entries or batch groupings. Those entries do not appear.

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### **VIII. Ballot Volume Implications**

Because multiple early-voting ICPs exceeded the 3,000-ballot threshold, the admitted swap-out practice implies that approximately 180,000 early-voting ballots—including the 44 tabulators and the Park Place Newtown location—were associated with CompactFlash replacement or mis-ingestion events.

By way of example:

- AV-Buckhead Library ICP 3 recorded 7,206 ballots, exceeding both the reported 5,000-ballot tested capacity and the 3,000-ballot swap-out threshold, without any corresponding CompactFlash replacement or EMS delineation.
  - Park Place Newtown, an early-voting location, recorded 4,216 ballots but was ingested into EMS as a non-early-voting (Election Day) precinct, exceeding the swap-out threshold without reconciliation as early-voting results.
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### **IX. Ballot Custody and Chain-of-Custody Gaps**

Early voting concluded on October 30, 2020, while Election Day occurred on November 3, 2020. Accordingly, ballots removed from ICP ballot boxes during CompactFlash replacement were necessarily accessible for a minimum of four days prior to Election Day.

Georgia law requires ballots to be sealed, stored securely, and maintained under documented chain-of-custody controls.<sup>11</sup> However, no official documentation identifies where these ballots were stored, how they were sealed, who maintained custody, or how they were later reconciled to EMS batches. No records have been produced accounting for custody or reconciliation during the multi-day pre-Election-Day period.

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### **X. Findings**

Taken together, the record reflects:

1. Progressive degradation of represented ballot capacity (29,000 → 10,000 → 5,000 → 3,000);
2. Operation of voting equipment outside the certified configuration (use of 4GB media);
3. Repeated CompactFlash replacement without creation of new logical tabulators or EMS ingestion records;
4. Ballot volumes inconsistent with EMS batch records; and
5. Undocumented removal and storage of ballots, undermining chain-of-custody and audit completeness.

The contemporaneous election artefacts—the EMS Batches Loaded Report, tabulator-level ballot counts, and official capacity directives—directly contradict the stated testing results, swap-out procedures, and certified operating assumptions relied upon by Fulton County.

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## XI. Legal Implications

These failures implicate non-compliance with:

- Help America Vote Act (HAVA) auditability and record-retention requirements (52 U.S.C. § 21081);<sup>12</sup> and
  - Georgia election statutes governing certified voting system use, ballot custody, and record preservation, including O.C.G.A. §§ 21-2-70, 21-2-386, and 21-2-493.<sup>13</sup>
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## XII. Conclusion and Requested Action

The record set forth in this complaint demonstrates material departures from Georgia's certified election procedures during early voting in the 2020 General Election. Those departures include operation of voting equipment outside the certified configuration, undocumented replacement of CompactFlash memory cards, ballot volumes inconsistent with EMS batch records, and the removal and storage of voted ballots outside documented chain-of-custody controls.

Because the Election Management System record does not reflect the procedures that election officials stated were followed, and because required custody and

reconciliation records are missing, the official record cannot demonstrate that all early-voting ballots were securely handled, properly reconciled, or audited in accordance with Georgia law and federal election standards. These deficiencies further prevent verification that ballot secrecy protections—specifically, protection of how individual voters cast their ballots—were preserved.

Accordingly, the Georgia State Election Board is requested to exercise its oversight authority to:

1. Require Fulton County to produce all records relating to CompactFlash memory-card testing, replacement directives, and implementation during early voting;
2. Require production of all EMS ingestion logs, batch reports, logical tabulator records, and reconciliation documents associated with early-voting ICP tabulators;
3. Require production of all chain-of-custody documentation governing ballots removed from ICP ballot boxes during CompactFlash replacement, including storage locations, sealing procedures, access controls, and custody logs;
4. Determine whether Fulton County's conduct complied with Georgia's certified voting system requirements, chain-of-custody laws, and ballot secrecy protections; and
5. Order any remedial, corrective, or enforcement action deemed appropriate to ensure compliance and to prevent recurrence.

These issues are procedural, material, and independent of intent. They directly undermine the completeness, traceability, and auditability of the official election record and warrant formal investigation and resolution by the Georgia State Election Board.

Thank you for your attention to this urgent matter; I respectfully request a prompt response and appropriate corrective action.

Regards

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## Footnotes & Links

1. Dominion Voting Systems, *Georgia RFI Response – ImageCast Precinct Storage Capacity* (2019).
  2. Georgia Elections Division, *Ballot Design and QR-Code Voting System Overview* (2020).
  3. Chris Harvey public statements, Georgia Elections Division, October 2020.
  4. Fulton County statements reported in media and election briefings, October–November 2020.
  5. Georgia Elections Division Official Election Bulletin, Oct. 27, 2020.  
<https://justthenews.com/sites/default/files/2020-12/GABulletinDominionVotingMemCards.pdf>
  6. Fulton County election administration statements, November 2020.  
<https://cbn.com/news/us/new-revelation-dominion-warned-ga-officials-about-problem-voting-machines>
  7. Election Night media footage showing Dominion-branded 4GB CompactFlash cards.
  8. Georgia Elections Division, *Official Election Bulletin – Dominion ICP Memory Cards*, Oct. 27, 2020.
  9. Dominion Democracy Suite EMS User Guide (v5.x), Logical Tabulator Architecture.
  10. Dominion Democracy Suite RTR User Guide (v5.11).  
[https://echocheck.org/archives/kraken/DominionSystems\\_UG-RTR-UserGuide-5-11-CO.pdf](https://echocheck.org/archives/kraken/DominionSystems_UG-RTR-UserGuide-5-11-CO.pdf)
  11. O.C.G.A. § 21-2-386; O.C.G.A. § 21-2-493.
  12. 52 U.S.C. § 21081 (HAVA §301).
  13. Georgia Election Code, Title 21.
  14. <https://www.coloradosos.gov/pubs/elections/VotingSystems/DVS-DemocracySuite513/documentation/2-02-SystemOverview5-13.pdf>
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**Attached:**

- Batches Loaded Report
- GA Master Solution Agreement with Dominion
- Request for Information - Dominion Official Response Document
- Dominion Results Tallying and Reporting Manual

**Exhibit: 4GB Dominion, ImageCast Specific Compact Flash Card used in the 2020 General Election in Fulton "Certified for use with ImageCast Poll Units"**



**Dominion Single Sided Ballot Capacity Table - 29,000 For 8GB Memory Card (QR Code Ballots)**

The ICP can be configured through its DCF configuration settings to limit the maximum number of ballots that can be processed onto a memory card. Based on the ballot sizes to be processed through a unit, along with the information in the table below, the election administrator can determine a maximum value for the number of ballots to be processed on a memory card in order to configure the DCF configuration settings for that unit.

|                                   |                                       | <b>Memory Card Size</b> |             |             |              |
|-----------------------------------|---------------------------------------|-------------------------|-------------|-------------|--------------|
| <b>Ballot Size (Single-Sided)</b> | <b>Approx. Ballot Image Size (KB)</b> | <b>2 GB</b>             | <b>4 GB</b> | <b>8 GB</b> | <b>16 GB</b> |
| 8.5" x 11"                        | 258                                   | 5800                    | 13500       | 29000       | 59900        |
| 8.5" x 14"                        | 286                                   | 5200                    | 12200       | 26200       | 54200        |
| 8.5" x 17"                        | 325                                   | 4600                    | 10700       | 23000       | 47700        |
| 8.5" x 20"                        | 352                                   | 4200                    | 9900        | 21300       | 44000        |
| 8.5" x 22"                        | 382                                   | 3900                    | 9100        | 19600       | 40500        |
| <b>Ballot Size (Double-Sided)</b> |                                       |                         |             |             |              |
| 8.5" x 11"                        | 382                                   | 3900                    | 9100        | 19600       | 40500        |
| 8.5" x 14"                        | 476                                   | 3100                    | 7300        | 15700       | 32600        |
| 8.5" x 17"                        | 517                                   | 2900                    | 6800        | 14500       | 30000        |
| 8.5" x 20"                        | 564                                   | 2600                    | 6200        | 13300       | 27500        |
| 8.5" x 22"                        | 633                                   | 2400                    | 5500        | 11800       | 24500        |

Table 5-4: ImageCast<sup>®</sup> Precinct Ballot Image Capacity for Various Ballot Sizes and Memory Card Sizes

## Mobile Bus Analysis Appendix:

### Appendix A

#### Review of Mobile Voting Bus CompactFlash and Tabulator Administration

This appendix examines the two mobile voting bus locations that were publicly cited by Fulton County as examples where CompactFlash (CF) swap-out procedures were properly administered during early voting in the 2020 General Election. The purpose of this appendix is to assess whether the actual EMS records and tabulator tapes associated with these units conform to (1) the County's stated procedures, (2) Dominion's documented guidance, and (3) EMS requirements for auditable result segmentation.

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## A.1 Mobile Voting Bus One

### EMS Entries Identified

The EMS *Batches Loaded Report* reflects the following entries associated with Mobile Bus One:

- Tabulator ID 2790 — *AV-Mobile Bus One ICP* — 3,264 ballots
- Tabulator ID 732 — *AV-Mobile Bus One ICP 2* — 2,021 ballots

These entries indicate that Mobile Bus One was associated with two different tabulator IDs, not a single tabulator with segmented CompactFlash media.

### Results Tapes Produced

In response to VoterGA's public records request, Fulton County produced two results tapes for *AV-Mobile Bus One ICP*. Both tapes:

- Reflect the same tabulator name (*AV-Mobile Bus One ICP*),
- Reflect the same tabulator ID (2790),
- Reflect identical ballot totals (3,264 ballots), and
- Appear to be duplicate printings of the same logical tabulator record.

Critically, no results tape was produced for *AV-Mobile Bus One ICP 2* (Tabulator ID 732) representing 2,021 ballots, despite the EMS showing a published results file and ballot totals for that tabulator.

### Finding

Mobile Bus One does **\*\*not\_toggle** evidence of a compliant CompactFlash swap-out. Instead:

- The EMS reflects two distinct tabulator IDs, indicating multiple tabulators rather than a single tabulator with logical segmentation;
- The only tapes produced reflect duplicate reporting of Tabulator ID 2790;
- The EMS entry for Tabulator ID 732 lacks a corresponding results tape, rendering that entry unreconciled and unauditible.

This configuration contradicts Dominion’s guidance requiring creation of a new logical tabulator within the same election project when additional capacity is needed and fails to preserve an auditable linkage between ballots, media, and reported results.

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## A.2 Mobile Voting Bus Two

### EMS Entries Identified

The EMS *Batches Loaded Report* reflects the following entries for Mobile Bus Two:

- Tabulator ID 2800 — *AV-Mobile Bus Two ICP* — 4,448 ballots
- Tabulator ID 733 — *AV-Mobile Bus Two ICP 2* — 1,462 ballots

Unlike Mobile Bus One, Mobile Bus Two does show two distinct tabulator records with different names, IDs, and ballot totals.

### Assessment Against Dominion Guidance

Dominion’s guidance (commonly referred to as *Option 2*) specifies that when CompactFlash capacity is exceeded and no additional physical tabulators are deployed, election officials are to add a new logical tabulator to the same election project—preserving continuity of the original tabulator identity while logically segmenting results.

Instead, Mobile Bus Two reflects:

- The use of separate tabulator identities, rather than
- Logical tabulator continuity tied to a single physical device.

### Finding

While Mobile Bus Two reflects segmented results, that segmentation was implemented through distinct tabulator IDs, not through the logical-tabulator method prescribed by Dominion and described by the County. This approach contradicts the

County's stated CF swap-out procedure and does not establish a compliant or standardized process.

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### **A.3 Comparative Findings and Inconsistencies**

When reviewed together, the mobile voting bus records demonstrate that:

- **Mobile Bus One shows multiple tabulator IDs, duplicate reporting for one tabulator, and a missing results tape for the second EMS entry;**
- **Mobile Bus Two shows segmentation through separate tabulator identities rather than logical tabulator continuity;**
- **The two mobile bus locations are internally inconsistent with each other, indicating that no uniform or standardized CompactFlash replacement procedure was followed.**

Accordingly, the mobile voting bus records do not validate Fulton County's claim that CompactFlash swap-out procedures were properly administered during early voting. Instead, they demonstrate inconsistent handling of tabulators, CompactFlash media, and EMS recordkeeping.

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### **A.4 Relevance to Countywide Findings**

This appendix reinforces the central findings of the complaint by demonstrating that even the only locations cited as properly administered fail to conform to:

- **Dominion's documented guidance,**
- **Fulton County's stated procedures, and**
- **EMS requirements for auditable result segmentation and reconciliation.**

Rather than serving as exceptions, the mobile voting bus records further confirm systemic inconsistencies in CompactFlash handling, tabulator identification, and audit traceability during early voting.

### **EXHIBITS**

The report tapes were produced pursuant to a public records request submitted by VoterGA. Consistent with Dominion's EMS design, each mobile voting location should

reflect one physical tabulator, two distinct CompactFlash card ingestions recorded in the EMS Batches Loaded Report, and a corresponding results tape for each card, all referencing a consistent tabulator identity to enable traceability between media, results, and ballots for audit purposes.

Mobile Bus ONE - Same tapes saved differently. This omission has not been included in previous complaints.

First Tape

Second Tape

County  
 Fulton Nov 2020  
 General  
 Tuesday, November 3, 2020

Tabulator Name  
 AV-Mobile Bus One ICP

Tabulator ID  
 2790

Voting Location  
 AV-Mobile Bus One

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Poll Opened  
 Oct 12/2020 07:02:54

Poll Closed  
 Nov 03/2020 23:45:25

Report Printed  
 Nov 03/2020 23:48:20

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Unit Model: PCOS-320C (Rev 1072)  
 Unit Serial: AAFAJJS0001  
 Protective Counter: 148  
 Software Version: 5.5.3-0002

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Total Scanned: 3264  
 Total Voters: 3264

County  
 Fulton Nov 2020  
 General  
 Tuesday, November 3, 2020

Tabulator Name  
 AV-Mobile Bus One ICP

Tabulator ID  
 2790

Voting Location  
 AV-Mobile Bus One

-----

Poll Opened  
 Oct 12/2020 07:02:54

Poll Closed  
 Nov 03/2020 23:45:25

Report Printed  
 Nov 03/2020 23:48:20

-----

Unit Model: PCOS-320C (Rev 1072)  
 Unit Serial: AAFAJJS0001  
 Protective Counter: 148  
 Software Version: 5.5.3-0002

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Total Scanned: 3264  
 Total Voters: 3264

**Mobile Bus Two shows different tabulator IDs, demonstrating tabulator replacement rather than CompactFlash card swap-out, contrary to the Secretary of State's directive and Dominion's prescribed procedure.**

**First Tape**

**Second Tape**

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County  
Fulton Nov 2020  
General  
Tuesday, November 3, 2020

Tabulator Name  
AV-Mobile Bus Two ICP

Tabulator ID  
2800

Voting Location  
AV-Mobile Bus Two

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Poll Opened  
Oct 12/2020 06:46:27  
Poll Closed  
Nov 03/2020 22:42:56  
Report Printed  
Nov 03/2020 22:50:00  
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Unit Model: PCOS-320C (Rev 1072)  
Unit Serial: AAFAJJP0099  
Protective Counter: 1664  
Software Version: 5.5.3-0002  
-----

Total Scanned: 4448  
Total Voters: 4448

County  
Fulton Nov 2020  
General  
Tuesday, November 3, 2020

Tabulator Name  
AV-Mobile Bus Two ICP 2

Tabulator ID  
733

Voting Location  
AV-Mobile Bus Two

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Poll Opened  
Oct 24/2020 12:21:56  
Poll Closed  
Nov 04/2020 02:37:04  
Report Printed  
Nov 04/2020 02:38:24  
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Unit Model: PCOS-320C (Rev 1072)  
Unit Serial: AAFAJJZ0217  
Protective Counter: 10145  
Software Version: 5.5.3-0002  
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Total Scanned: 1462  
Total Voters: 1462

The EMS Batches Loaded Entries for the Mobile Buses - Totalling 11,195 ballots

FULTON

Batches Loaded Report

| DateTime              | Tabulator Number | Tabulator Name          | Batch Number | Result File Name         | Lead Ballots | Total Ballots | Result State |
|-----------------------|------------------|-------------------------|--------------|--------------------------|--------------|---------------|--------------|
| 11/3/2020 10:58:39 PM | 2800             | AV-Mobile Bus Two ICP   | 0            | 1_1950_2800_0_DETAIL.DVD | 4448         | 4448          | Published    |
| 11/4/2020 12:17:43 AM | 2790             | AV-Mobile Bus One ICP   | 0            | 1_1970_2790_0_DETAIL.DVD | 3264         | 3264          | Published    |
| 11/4/2020 1:48:48 AM  | 732              | AV-Mobile Bus One ICP 2 | 0            | 1_1970_732_0_DETAIL.DVD  | 2021         | 2021          | Published    |
| 11/4/2020 1:49:17 AM  | 733              | AV-Mobile Bus Two ICP 2 | 0            | 1_1950_733_0_DETAIL.DVD  | 1462         | 1462          | Published    |
|                       |                  |                         |              |                          | 11195        | 11195         |              |