EXHIBIT 2
DECLARATION UNDER PENALTY OF PERJURY
OF GABRIEL STERLING

1. I am over the age of majority, of sound mind, and otherwise qualified to make this Declaration based upon my own personal knowledge. This Declaration is offered pursuant to 28 U.S.C. § 1746 in support of Georgia Secretary of State Brad Raffensperger’s (“Defendant” or “Secretary”) in the above-captioned matter.

2. I am the Implementation Manager for the Statewide Voting System for the Office of the Georgia Secretary of State. I have held that position since October 2019. Since taking this position, I have acquired firsthand knowledge of Georgia’s upgrade to the new voting system and the rollout of the new Dominion system.

3. At the time of giving this declaration, Georgia’s new ballot marking devices (“BMDs”) have been delivered to each of Georgia’s 159 counties. The new election management system (“EMS”) has also been deployed in all 159 counties.
4. The new BMDs produce a paper ballot that is marked with the voter’s choice(s) in a format readable by the voter. The paper ballots can be audited.

5. Early voting for the June 9 primary election (the “June Primary”) commences on Monday, May 18.

6. It is difficult to determine the cost of replacing the BMDs with hand marked paper ballots for several reasons, including that voters residing in different counties (and polling locations) will have different ballots.

7. Before April 20, 2020, the Secretary’s Office began working on several fronts to procure personal protective equipment (“PPE”) for use during the June Primary, as well as sanitizing and disinfectant materials.

8. These efforts include using one-time federal funds to provide reimbursable grants for Georgia’s counties to purchase PPE. The federal grant funds allow counties to be reimbursed on a 90/10 basis; in other words, for every $1 a county spends, the State will reimburse up to $9, up to $3,000 total. This means that a county can purchase $3,333.33 worth of PPE and pay only $333.33.

9. The Secretary’s Office is also working in conjunction with the Georgia Emergency Management Agency to directly procure PPE and distribute it to counties.

10. Purchase orders are currently in place for styluses (that may be disinfected between uses so voters do not have to directly touch BMD screens), gloves, hand sanitizers, disinfecting wipes, and reusable FDA approved masks.

11. The Secretary has also identified a source for plexiglass shields to separate poll workers from voters, and it is working with Georgia’s counties to ascertain possible configurations.
12. To obtain additional hand marked paper ballots would cost significantly more, as the types of ballots vary by county and by political party. At this time, it is unclear if one-time federal funds could be used to purchase these additional ballots.

13. When the Secretary decided to mail each of Georgia’s voters on the active voter list an absentee ballot request form, he had to act quickly. Due to limitations with the way the State’s mail vendor could pull data, the Secretary had to choose between sending absentee ballot request forms to mailing and residential addresses. Given that only approximately 20% of Georgia’s active voters have the mailing address field filled and 100% have the residential address, the decision was made to use residential addresses. On May 6, 2020, the Secretary reissued applications to voters’ mailing addresses if that address differed from their residential address, and if they had not already requested an absentee ballot. This represents about 276,000 Georgia voters.

14. When county election officials receive absentee ballot request forms for Georgia voters, they upload the ballot request information into what is known as the eNet system. Georgia’s My Voter Page shows when counties record the information in the eNet system and not when the ballot is mailed via the United States Postal Service.

15. The Secretary learned that the vendor sent a secrecy sleeve after voters began receiving the absentee ballot packets. Among other responses, the Secretary directed the mailing vendor to include revised instructions with absentee ballot packets.

16. As of Monday, May 11, 1,287,632 absentee ballot applications have been accepted. 1,237,181 absentee ballots have been mailed or in the process of being mailed. 1,055,502 have been scanned as delivered to voters’
mailboxes, and 180,215 absentee ballots have been returned, processed, and accepted by local election officials.

17. The total cost of the Secretary’s mail efforts for the 2020 June Primary will be at least $5.5 million, and one time federal funds have been used to fund this project.

{Signature On Following Page}
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 11th day of May 2020.

[Signature]

Gabriel Sterling