EXHIBIT 4
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

COALITION FOR GOOD
GOVERNANCE, et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his
official capacity as Secretary of State; et al.,

Defendants.

DECLARATION OF MICHAEL BARNES

Pursuant to 28 U.S.C. § 1746, I, MICHAEL BARNES, make the
following declaration:

1.

My name is Michael Barnes. I am over the age of 21 years, and I am
under no legal disability which would prevent me from giving this
declaration. If called to testify, I would testify under oath to these facts.

2.

I currently am the Director of the Center for Election Systems in the
Office of Secretary of State Brad Raffensperger. I have held that position
since January 2018. From 2010 to December 31, 2017, I was Director of the Center for Election Systems at Kennesaw State University (“KSU”), which was an outside contractor with the Office of the Secretary of State. From my time at the Center for Election Systems, both at KSU and currently, I have acquired firsthand knowledge of Georgia’s voting system and ballot building process.

**Savannah-Chatham County School Board Election**

3.

The Savannah-Chatham County Public School System (“SCCPSS”) is governed by an elected School Board of Public Education, which has elections on the ballot in the June 9, 2020 election for school board members representing District 1, District 2, District 3, and District 7.

4.

On or about April 24, 2020, the Secretary of State’s Office was notified that the absentee ballots issued to voters who reside in SCCPSS District 7 did not contain the election for the District 7 school board race. Further, the race for the SCCPSS District 7 election was inadvertently placed on the absentee ballots issued to voters residing in SCCPSS District 4, although those voters are not eligible to vote in the District 7 election. The school board position for SCCPSS District 4 is not up for election this year.
5.

Upon reviewing this issue, the Secretary of State’s Office discovered that the ballot combinations in the database assigned to voters in SCCPSS District 4 contained the race for the SCCPSS District 7 election, which resulted in the SCCPSS District 7 race appearing on the absentee ballots issued to voters residing in SCCPSS District 4. Additionally, the ballot combinations in the database assigned to voters residing in SCCPSS District 7 did not include the SCCPSS District 7 race, which resulted in voters residing in District 7 receiving absentee ballots without the SCCPSS District 7 race on the ballot.

6.

Because absentee ballots need to be tabulated using the database from which the ballots were built, we could not simply update the original database that contained the erroneous ballot combinations to address this issue. Instead, a second database had to be created containing the correct ballot combinations assigned to voters in District 4 and District 7, which would allow voters in District 4 and District 7 to receive ballots with the correct races.
7.

On April 26, 2020, we completed building the second database and sent the updated ballot images to the vendor for printing.

8.

Because the ballots built using the second database will need to be tabulated using the second database, the header on the ballots built using the second database is shaded. Any absentee ballots without a shaded header were built using the original database. By including this distinguishing characteristic on the ballot header, Chatham County elections officials will know whether an absentee ballot needs to be tabulated using the original database or the second database. In other words, all absentee ballots received by the Chatham County Board of Registrars without a shaded header will be tabulated using the original database, and all absentee ballots received by the Chatham County Board of Registrars containing the shaded header will be tabulated using the second database.

9.

I understand that the Chatham County Board of Registrars has reissued a new absentee ballot to every voter in SCCPSS District 7 who previously received an absentee ballot without that race, and the original ballot was cancelled.
10.

Additionally, because voters residing in SCCPSS District 4 received absentee ballots containing the race for SCCPSS District 7, any absentee ballots from the original database (i.e. ballots without the shaded header) that the Chatham County Board of Registrars receives from voters in SCCPSS District 4 will be duplicated by the county elections officials onto absentee ballots with the corrected ballot style built using the second database prior to being tabulated. This will ensure that voters in District 4 who received an absentee ballot containing the District 7 race, and are not entitled to vote in the District 7 election, will not be able to vote in the District 7 race. The duplication process is the same as the process for duplicating provisional ballots.

11.

After all ballots are tabulated using their corresponding database, the votes tabulated using the original database will be manually input into the second database so that a single database contains the entire vote totals.

[Signature on following page]
I declare under penalty of perjury that the foregoing is true and correct.

Executed this 11th day of May, 2020.

MICHAEL BARNES