July 15, 2024

By Email

John Fervier, Chairman (jfervier.seb@gmail.com)
Sara Tindall Ghazal, Member (saraghazal.seb@gmail.com)
Janice W. Johnston, Member (jjohnstonmd.seb@gmail.com)
Rick Jeffares, Member (rjeffares.seb@gmail.com)
Janelle King, Member (jking.seb@gmail.com)
Georgia State Election Board
2 Martin Luther King Jr. Drive
Suite 802, Floyd West Tower
Atlanta, GA 30334

Re: Comment on Proposed Amendment to Rule 183-1-12-.02

Dear Chairman Fervier and State Election Board Members:

The American Civil Liberties Union of Georgia, Common Cause Georgia, Citizens for Responsibility and Ethics in Washington, and Public Rights Project respectfully submit this comment on the proposed rule issued on July 3, 2024 by the State Election Board ("SEB" or "Board"),[1] which would amend the Board's rules to define "election certification." We urge the Board not to adopt the Proposed Rule because it is contrary to Georgia law, exceeds the Board's statutory authority, and would increase the risk of certification abuse and electoral chaos in Georgia.

This comment supplements the preliminary comment we submitted on June 24, 2024, prior to the Board's release of the Proposed Rule. Pursuant to O.C.G.A. § 50-13-4(a)(2), we request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it "issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption." *Id*.

I. Background

A. Rulemaking to Amend SEB Rule 183-1-12-.02

On March 26, 2024, Fulton County Board of Registration and Elections ("BRE") member Michael Heekin petitioned the Board, pursuant to SEB Rule 183-1-1.0.1 and the Georgia Administrative Procedure Act, to amend SEB Rule 183-1-12-.02 to include a definition of the

[1] *See* State Election Board, Notice of Proposed Rulemaking, Revisions to Subject 183-1-12-.02 (July 3, 2024) [hereinafter Proposed Rule], https://sos.ga.gov/sites/default/files/2024-07/Notice%20of%20Proposed%20Rulemaking%20-%20183-1-12-.02.pdf.

term "Certify the results of a primary, election or runoff."[2] The Petition asserts that Georgia law entrusts election officials to "properly tabulate, certify, and report" election results, but does not define "what it means to certify an election."[3] The Petition claims that, without a "standard for certification," it is unclear whether election "superintendents [are] performing a simple bureaucratic act of certifying the tabulated results of an election even if those results are suspect" or are instead "entrusted to use their professional judgment in the certification process."[4] The Petition thus proposes a definition of election certification purportedly based on "several authorities including the United States Election Assistance Commission" which "suggest[] that certifying the results of an election requires election officials to pass judgment on the election as a whole, including making sure that every valid vote is included in the final results."[5]

Specifically, the Petition proposes amending SEB Rule 183-1-12-.02 to include the following definition:

> (c.2) "Certify the results of a primary, election, or runoff," or words to that effect, means to attest, after reasonable inquiry, that the tabulation and canvassing of the election are complete and accurate and that the results are a true and accurate accounting of all votes cast in that election.[6]

The Board considered the Petition at its May 8, 2024 meeting and voted 2-1 to initiate rulemaking. Members Johnston and Jeffares voted yes, and former Member Lindsey voted no.[7] Mr. Lindsey noted that the Board had already voted unanimously at the same meeting to designate two Board members to work on a separate proposed rule regarding the types of information superintendents would be entitled to receive prior to certifying elections, and that he preferred to "do this all together" in a single rule.[8] Mr. Lindsey also expressed concern that adopting the "reasonable inquiry" language could allow county boards to "unfairly" or "unduly delay certification."[9]

On July 3, 2024, the Board released the Proposed Rule. Its text mirrors the language proposed in Mr. Heekin's Petition, quoted above. The Board explains that "[t]he purpose of the rule is to explicitly define certification, and to establish clear, standardized criteria for officially

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[2] Letter from Michael Heekin to John Fervier, Petition to Amend SEB Rule 183-1-12-.02, at 1 (Mar. 26, 2024) [hereinafter Heekin Petition], https://sos.ga.gov/sites/default/files/forms/Rule%20Petition%20-%20Heekin_redacted.pdf.

[3] *Id.*

[4] *Id.*

[5] *Id.* at 2.

[6] *Id.*

[7] *See* Transcript of May 8, 2024 State Election Board Meeting, at 301-04 [hereinafter May 8 Board Meeting], https://sos.ga.gov/sites/default/files/forms/24-05.08.2024%20SEB%20307%20final.pdf.

[8] *Id.* at 113, 289-90, 293-94, 301-02 (Statement of Member Lindsey).

[9] *Id.* at 298-99.

confirming the results of an election."[10] It adds that the "main features of the amendments to this rule are that it adopts the U.S. Election Assistance Commission's definition of certification, while stating explicitly that certifying officials should properly conduct a reasonable inquiry in arriving at the certification decision."[11]

B. Legal Framework for County-Level Election Certification

Under Georgia law, the "elections superintendent" is the election administrator in charge of certification at the county level. O.C.G.A. § 21-2-70(9). Although the person or entity who fills this role varies by county, the legislature has created BREs in most counties that have "the powers and duties of the election superintendent relating to the conduct of primaries and elections." *Id.* § 21-2-40(b). In such counties, the BRE itself is the superintendent, not its individual members. *See id.*; SEB Rule 183-1-12.02(1)(g).

Georgia law imposes clearly defined duties on election superintendents. The election superintendent "shall … receive from poll officers the returns of all primaries and elections, … canvass and compute the same, and … certify the results thereof to such authorities as may be prescribed by law." *Id.* § 21-2-70(9). The superintendent oversees the computation, canvassing, tabulation, and ultimate certification of the returns, *see id*. § 21-2-493, as well as a mandatory pre-certification audit process, *see id.* § 21-2-498. The superintendent may order a pre-certification recount or recanvass in precincts in the county where there appears to be a "discrepancy" or "error, although not apparent on the face of the returns." *Id.* § 21-2-495(a), (b). Each of these processes are governed by a detailed set of rules established by statute and regulation, *see* SEB Rules 183-1-12.01-.20, none of which give superintendents the discretion to throw out votes or substitute their own judgment for the actual vote totals.

"Upon the completion of … computation and canvassing, the superintendent *shall* tabulate the figures for the entire county or municipality and sign, announce, and attest the same, as required by this Code section." *Id*. § 21-2-493(a) (emphasis added). "The consolidated returns *shall then be certified* by the superintendent in the manner required by this chapter. Such returns *shall be certified* by the superintendent not later than 5:00 P.M. on the Monday following the date on which such election was held and such returns *shall* be immediately transmitted to the Secretary of State." *Id.* § 21-2-493(k) (emphasis added). "Each county and municipal superintendent shall, upon certification, furnish to the Secretary of State in a manner determined by the Secretary of State a final copy of each ballot used for such election." *Id.* § 21-2-497(b).

The legislature's repeated use of the word "shall" means that certification by the statutory deadline is mandatory and non-discretionary. *See Hall Cnty. Bd. of Tax Assessors v. Westrec Props., Inc.*, 809 S.E.2d 780, 786 (Ga. 2018) ("The word 'shall' is generally construed as a word of command. The import of the language is mandatory."); *Mead v. Sheffield*, 601 S.E.2d 99, 100 (Ga. 2004) (applying principle in construing the Election Code); 1978 Ga. Op. Att'y Gen. 246 (No. U78-44) (Oct. 27, 1978) ("[T]he use of the word 'shall' … with respect to the duties imposed upon a … superintendent of elections … indicates the imposition by the General

[10] Proposed Rule at 2.

[11] *Id.*

Assembly … of a mandatory duty to perform certain enumerated functions," and "an action for mandamus … may lie to require performance … of [these] duties.").

Moreover, longstanding Georgia Supreme Court precedent holds that election certification and similar acts are non-discretionary or "ministerial." *See, e.g.*, *Thompson v. Talmadge*, 41 S.E.2d 883, 893 (Ga. 1947) (recognizing the "general, if not indeed the universal, rule of law applicable to election canvassers" that "they are given no discretionary power except to determine if the returns are in proper form and executed by the proper officials and to pronounce the mathematical result, unless additional authority is expressed"); *Bacon v. Black*, 133 S.E. 251, 253 (Ga. 1926) ("The duties of the managers or superintendents of election who are required by law to assemble at the courthouse and consolidate the vote of the county are purely ministerial."); *Davis v. Warde*, 118 S.E. 378, 391 (Ga. 1923) ("The duties of canvassers are purely ministerial; they perform the mathematical act of tabulating the votes of the different precincts as the returns come to them."); *Tanner v. Deen*, 33 S.E. 832, 835-36 (Ga. 1899) (issuing writ of mandamus requiring superintendents to consolidate election returns because their duties were "regulated by statute, and not left to the discretion of the party performing" them); *Brockett v. Maxwell*, 38 S.E.2d 176, 179 (Ga. Ct. App. 1946) ("ascertaining and declaring the result of the election" is "ministerial").

Election superintendents cannot withhold certification based on suspected fraud or errors in returns; such issues are instead resolved in the courts. The Election Code requires that "[i]f any error or fraud is discovered, the superintendent shall compute and certify the votes justly, regardless of any fraudulent or erroneous returns presented to him or her, and shall report the facts to the appropriate district attorney for action." O.C.G.A. § 21-2-493(i); *see also id.* § 21-2-522(1), (3), (4) (authorizing election contests based on alleged misconduct, fraud, irregularities, illegal votes, and counting errors). If "the results of an election contest change the returns so certified, a corrected return shall be certified and filed by the superintendent which makes such corrections as the court orders." *Id.* § 21-2-493(l). "The determination of the judicial question affecting the result in such county elections is confined to the remedy of contest as provided by law." *Bacon*, 133 S.E. at 253. This longstanding rule reflects that election "superintendents [are] not selected for their knowledge of the law" and lack authority to render legal judgments on the validity of election returns. *Tanner*, 33 S.E. at 835.

This is not just the law in Georgia: "The doctrine that canvassing boards and return judges are ministerial officers possessing no discretionary or judicial power," has been "settled in nearly or quite all the states" since the late nineteenth century. George W. McCrary, A Treatise on the American Law of Elections, at 200, § 264 & n.1 (4th ed. 1897); *see also* Lauren Miller & Will Wilder, *Certification and Non-Discretion: A Guide to Protecting the 2024 Election*, 35 Stan. L. & Pol'y Rev. 1, 26-31 (2024) (discussing cases).[12]

[12] *See, e.g.*, *Stearns v. State ex rel. Biggers*, 100 P. 909, 911 (Okla. 1909) ("To permit canvassing boards who are generally without training in the law . . . to look elsewhere than to the returns for a reason or excuse to refuse to canvass the same and adjudicate and determine questions that may be presented aliunde, often involving close legal questions, would afford temptation and great opportunity for the commission of fraud."); *Lewis v. Marshall Cty. Comm'rs*, 16 Kan. 102, 108 (1876) ("[I]t is a common error for a canvassing board to overestimate its powers. . . . Its duty is almost wholly ministerial. It is to

II. The Board Should Not Adopt the Proposed Rule

Insofar as the Proposed Rule purports to give county officials discretionary power to conduct a "reasonable inquiry" of election results prior to certification, it is contrary to Georgia law and exceeds the Board's statutory authority. Nor would the Proposed Rule achieve the Board's stated goal "to establish clear, standardized criteria for officially confirming the results of an election."[13] To the contrary, its open-ended language would invite certification abuse and electoral chaos. It should not be adopted.

The Board is no doubt empowered to adopt reasonably detailed canvassing rules consistent with the Election Code. Indeed, the Board unanimously voted at its May 8 meeting to designate two Board Members to work with interested parties in crafting such rules.[14] That is a sensible path for addressing any legitimate concerns with the canvassing process, not this rulemaking.

A. The Proposed Rule is Contrary to Georgia Law

At the May 8 Board meeting, Chairman Fervier repeatedly expressed caution at adopting rules that might "exceed what the legislature has put in the statute."[15] He stressed: "This Board should never get in front of the legislature, and do more than what the legislature has put into statute and I just want to make sure that before we adopt rules that they are within our . . . guidelines of what the statute allows for."[16]

The legislature has spelled out in painstaking detail election superintendents' duties and powers. *See supra* Part I.B. Nowhere has the legislature authorized superintendents to conduct a free-roaming "reasonable inquiry" of the election results prior to certifying consolidated returns under O.C.G.A. § 21-2-493(k). That omission matters, because where the legislature has desired to give superintendents discretionary power, it has done so expressly. *See, e.g.*, O.C.G.A. § 21-2-493(c) ("In precincts in which paper ballots have been used, the superintendent *may* require the production of the ballot box and the recount of the ballots contained in such ballot box … *in the discretion of the superintendent*") (emphasis added). Thus, "we must presume that if the General Assembly had wished to" give election superintendents discretionary authority over the certification process, "the legislature would have done so expressly" and that its "failure to do so … was a matter of considered choice." *In re Est. of T. M. N.*, 892 S.E.2d 819, 825 (Ga. Ct. App.

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take the returns as made to them from the different voting precincts, add them up, and declare the result. Questions of illegal voting, and fraudulent practices, are to be passed upon by another tribunal.").

[13] Proposed Rule at 2.

[14] *See* May 8 Board Meeting at 113 (Board voting unanimously not to proceed with rulemaking on petition proposed by Bridget Thorne and instead "to appoint two Members to work with the petitioner to come up with an alternate rule to be presented at the next [Board] meeting").

[15] *Id.* at 71-72 (Statement of Chairman Fervier).

[16] *Id.*

2023); *accord Lyman v. Cellchem Int'l, Inc.*, 796 S.E.2d 255, 257 (Ga. 2017); *Kemp v. Kemp*, 788 S.E.2d 517, 524 (Ga. Ct. App. 2016).

This conclusion is reinforced by a long line of Georgia Supreme Court precedent. For more than a century, that court has made clear that election certification is ministerial and non-discretionary—not an opportunity to conduct a roving "inquiry" of election results to determine whether they are "suspect" or "true" based on the superintendents' "professional judgment."[17] *See, e.g.*, *Thompson*, 41 S.E.2d at 893; *Bacon*, 133 S.E. at 253; *Davis*, 118 S.E. at 391; *Tanner*, 33 S.E. at 835-36; *Brockett*, 38 S.E.2d at 178-79. The Georgia Attorney General has likewise long embraced the view that the Election Code imposes "mandatory dut[ies]" on "superintendent[s] of elections." 1978 Ga. Op. Att'y Gen. 246. Although these authorities predate the current version of the Election Code, "the legislature is presumed to know the condition of the law and to enact statutes with reference to it," and "the legal backdrop against which a statute is enacted is often a key indicator of a statute's meaning." *Ford Motor Co. v. Cosper*, 893 S.E.2d 106, 115 (Ga. 2023); *see also Dove v. Dove*, 680 S.E.2d 839, 842 (Ga. 2009) ("[O]ur legislature is presumed to enact statutes with full knowledge of existing law, including court decisions.").

With the current Election Code, the legislature has kept in place the "general, if not indeed the universal, rule of law applicable to election canvassers" that "they are given no discretionary power except to determine if the returns are in proper form and executed by the proper officials and to pronounce the mathematical result, unless additional authority is expressed." *Thompson*, 41 S.E.2d at 877. Insofar as the proposed amendment would grant election superintendents "discretionary power" beyond that expressly conferred by statute, it is contrary to settled Georgia law.

The Board has not acknowledged this judicial precedent and, indeed, fails to cite any Georgia authority supporting its proposed definition of "certification." The Board instead cites non-binding guidance by the U.S. Elections Assistance Commission.[18] But even that guidance is taken out of context. The guidance does not purport to offer a universal definition of election certification for all 50 states. To the contrary, it recognizes that "[s]tate laws guide the certification process at the local level"; that "[t]he method, scope, and timing of post-election activities vary by state"; and that "[l]ocal election officials certify election results using a variety of methods, as outlined in state law."[19] Nor does the guidance contain the problematic "reasonable inquiry" language included in the Proposed Rule.[20]

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[17] Heekin Petition at 1.

[18] Proposed Rule at 2; *see also* Heekin Petition at 2.

[19] U.S. Election Assistance Comm'n, *Election Certification*, at 1-2 (Feb. 2022), https://www.eac.gov/sites/default/files/electionofficials/postelection/Guide_to_Election_Certification_EAC.pdf.

[20] *See id.*

Ultimately, this Board must follow Georgia law. And Georgia "law" includes not just statutes passed by the legislature, but also precedential decisions of the Georgia Supreme Court. The Board is bound by that precedent and must consider it in conducting this rulemaking.

B. The Proposed Rule Exceeds the Board's Statutory Authority

The legislature has empowered the Board "[t]o formulate, adopt, and promulgate such rules and regulations, *consistent with law*, as will be conducive to the fair, *legal*, and orderly conduct of primaries and elections." O.C.G.A. § 21-2-31(2) (emphasis added). As outlined above, the Proposed Rule is not "consistent with law." The Board plainly lacks authority to grant election superintendents any discretionary power of "reasonable inquiry" where the legislature has not conferred such power and where the "legal backdrop against which [the Election Code] was enacted," *Ford Motor Co.*, 893 S.E.2d at 115, makes clear that certification is a ministerial, non-discretionary function.

C. The Proposed Rule's Vague Language Would Invite Certification Abuse and Electoral Chaos

The Board must also consider the context of the Proposed Rule. County election certification generated little controversy prior to 2020. But in recent years, dozens of county officials across the country have improperly refused to certify election results—sometimes in open defiance of state law and court orders.[21] In one extreme case, New Mexico county commissioner Couy Griffin voted not to certify a primary election in 2022 based on distrust of voting systems and defied a writ of mandamus by the New Mexico Supreme Court directing him to certify, stating: "My vote to remain a 'no' isn't based on any evidence. It's not based on any facts . . . . It's only based on my gut feeling and my own intuition."[22] Griffin was later criminally convicted and removed from office for his participation in the January 6, 2021 attack on the U.S. Capitol.[23]

This troubling pattern of county-level election subversion has unfortunately spread to Georgia.[24] Indeed, several BRE members who appeared at the May 8 Board meeting have

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[21] *See* Miller & Wilder, *supra*, at 14-22 (discussing cases in Michigan, New Mexico, Nevada, Arizona, and Pennsylvania); Protect Democracy, *Election Certification is Not Optional* (Mar. 2024) (discussing cases in Georgia, North Carolina, and Colorado), https://protectdemocracy.org/wp-content/uploads/2024/03/PD_County-Cert-WP_v03.1.pdf.

[22] Susan Montoya Bryan & Morgan Lee, *Screams, threats as New Mexico counties certify vote*, Associated Press (June 17, 2022), https://apnews.com/article/2022-midterm-elections-new-mexico-government-and-politics-donald-trump-fa26178d77b421ff7317d1a6ae83e0c4.

[23] Morgan Lee, Nicholas Riccardi, & Mark Sherman, *Supreme Court rejects appeal by former New Mexico county commissioner banned for Jan. 6 insurrection*, Associated Press (Mar. 18, 2024), https://apnews.com/article/supreme-court-insurrection-capitol-attack-new-mexico-cc69572ec4a4404c69947d7d91b3960a.

[24] Mark Niesse, *Several Republican officials vote against certifying Georgia elections*, Atlanta J. Const. (Nov. 22, 2023), https://www.ajc.com/politics/several-republican-officials-vote-against-certifying-georgia-elections/XRALMPAOZFHABLVH7756GILWD4/.

recently voted against certifying election results.[25] Even if these officials have legitimate complaints about the canvassing process, they must act within the confines of the law. And as explained above, Georgia law does not empower election superintendents to refuse or delay certification because they think in "their professional judgment" that the election results are "suspect."[26]

While the Board understandably seeks "to establish clear, standardized criteria for officially confirming the results of an election,"[27] the Proposed Rule is anything but "clear" and it lacks any "standardized criteria." If adopted, it will likely make matters worse. As former Member Lindsey noted at the May 8 meeting, the term "reasonable inquiry" is amorphous and susceptible to abuses that could "unfairly" or "unduly delay certification." The same is true of the phrase "true and accurate." Rogue county officials seeking to subvert the will of the people could try to exploit this vague language in refusing to certify election results they dislike, potentially throwing the state and even the nation into electoral chaos. And if county officials delay certification in violation of their mandatory duties, the Secretary of State might still proceed with his reporting of results without counting ballots from that county—thereby disenfranchising the county's voters. *See* O.C.G.A. § 21-2-499(b).

Such a widespread denial of Georgians' fundamental right to vote would be unconscionable. *See* Ga. Const. art. 2, § 1, ¶ II. As the Georgia Supreme Court presciently wrote more than a century ago:

> In a republican government, where the exercise of official power is but a derivative from the people, through the medium of the ballot box, it would be a monstrous doctrine that would subject the public will and the public voice, thus expressed, to be defeated by either the ignorance or the corruption of any board of canvassers. The duties of these boards are simply ministerial.

Houser v. Hartley, 120 S.E. 622, 625-26 (Ga. 1923) (quoting *People ex rel. Att'y Gen. v. Van Cleve*, 1 Mich. 362, 366 (1850)).

Suggesting that election superintendents have discretionary power over certification could also make them targets for threats of violence by those seeking to subvert election results — just as election officials, Congress, and the Vice President were targeted after the 2020 election. In light of the increasingly volatile threat environment facing election workers in Georgia,[28] the Board must stay vigilant of such risks.

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[25] *See* Mark Niesse, *Georgia election board proposes an 'inquiry' before certifying results*, Atlanta J. Const. (May 9, 2024), https://www.ajc.com/politics/georgia-election-board-proposes-a-new-rule-before-certifying-results/TW3BLX7EQFAQ7I4OD43IF6SSZ4/.

[26] Heekin Petition at 1.

[27] Proposed Rule at 2.

[28] Mark Niesse, *Preparing for the worst, Georgia election officials and police plan ahead*, Atlanta J. Const. (Apr. 23, 2024), https://www.ajc.com/politics/georgia-election-officials-and-police-prepare-for-voting-dangers/TFJXE7AS6NFGVLLMJ25DEYEIF4/.

Georgia courts have a long history of protecting against certification abuse. In 1899, Democratic superintendents in Coffee County refused to certify election returns, citing minor procedural flaws that they claimed invalidated returns from the McDonald precinct (without counting the votes from that precinct, the Democrats' candidates for representative and sheriff would have narrowly won the election). *See Tanner*, 33 S.E. at 833. The Georgia Supreme Court appropriately shut down this effort, issuing a writ of mandamus "requiring the superintendents to reassemble . . . and consolidate the vote of the county, including the returns from the McDonald precinct." *Id.* at 836.

Tanner is a powerful example of Georgia courts standing as a bulwark against abuse of the certification process. But courts are only a backstop. In the first instance, this Board should not adopt vague rules that invite such abuse. The Proposed Rule would do just that and thus should not be adopted.

D. The Board Should Consider Adopting Clear Canvassing Procedures Instead of Vague and Abusable Certification Rules

Instead of the Proposed Rule, we urge the Board to consider adopting reasonably detailed canvassing procedures—potentially as part of the rulemaking initiative the Board unanimously approved at the May 8 meeting.[29] The Board doubtless has the authority to adopt such rules, so long as they are consistent with state and federal law.

In crafting such rules, the Board must provide sufficient clarity and detail to help election officials do their jobs within statutory confines. A checklist of discrete requirements has far more utility—and creates far less opportunities for abuse—than open-ended grants of discretion. Other states have successfully adopted and implemented such rules.[30] Adopting similar rules in Georgia could help ensure, in Member Johnston's words, "basic ballot accounting."[31]

At all times, the Board must keep in mind its charge "[t]o formulate, adopt, and promulgate such rules and regulations, *consistent with law*, as will be conducive to the fair, legal, and orderly conduct of primaries and elections." O.C.G.A. § 21-2-31(2) (emphasis added).

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[29] May 8 Board Meeting at 113.

[30] *See, e.g.*, Colo. Election R. 10 (Canvassing and Recount), 8 Colo. Code Regs. § 1505-1 (2023), https://www.sos.state.co.us/pubs/rule_making/CurrentRules/8CCR1505-1/Rule10.pdf.

[31] May 8 Board Meeting at 80-82.

III. Conclusion

We respectfully urge the Board not to adopt the proposed amendment to SEB Rule 183-1-12.02.

Sincerely,

AMERICAN CIVIL LIBERTIES UNION OF GEORGIA
Rachel Lastinger
rlastinger@acluga.org
Caitlin May
cmay@acluga.org

CITIZENS FOR RESPONSIBILITY AND ETHICS IN WASHINGTON
Donald Sherman
dsherman@citizensforethics.org
Nikhel Sus
nsus@citizensforethics.org

COMMON CAUSE GEORGIA
Aunna Dennis
adennis@commoncause.org

PUBLIC RIGHTS PROJECT
Sophie House
sophie@publicrightsproject.org

CC:
Alexandra Hardin (ahardin@sos.ga.gov)