

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

CORECO JA'QAN PEARSON, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	CIVIL ACTION NO.
v.)	1:20-cv-4809-TCB
)	
BRIAN KEMP, <i>et al.</i> ,)	
)	
Defendants.)	

DECLARATION OF FRANCES WATSON

Pursuant to 28 U.S.C. § 1746, I, FRANCES WATSON, make the following declaration in support of the Defendants' Response In Opposition To Plaintiffs' Emergency Motion For Declaratory, Emergency, And Preliminary Injunctive Relief in the above-captioned matter.

1. 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 am the Chief Investigator in the Office of the Georgia Secretary of State. In this position, I conduct and supervise investigations of potential violations of state election law.

3. Investigators in the Secretary of State Office's are certified by the Georgia Peace Officer Standards and Training Counsel, and they conduct investigations into the administration of elections and potential frauds and irregularities in elections in Georgia, among other things. Upon concluding an investigation into violations of Georgia election law, the findings of such investigations are reported to the State Election Board for further action.

4. On November 3, 2020, the Secretary of State's Office received complaints that staff of the Fulton County Board of Registrations and Elections directed clerks, public observers, and media personnel to leave the State Farm Arena location where ballots were being tabulated due to a water leak at the State Farm Arena, but Fulton County staff continued to scan ballots in the tabulation center at the State Farm Arena.

5. The Secretary of State's Office opened an investigation into the incident at State Farm Arena. Our investigation revealed that the incident initially reported as a water leak late in the evening on November 3rd was actually a urinal that had overflowed early in the morning of November 3rd, and did not affect the counting of votes by Fulton County later that evening.

6. My investigators have interviewed witnesses and security footage of State Farm Arena between November 3 and 4, 2020. Our investigation

discovered that observers and media were not asked to leave. They simply left on their own when they saw one group of workers, whose job was only to open envelopes and who had completed that task, also leave.

7. Our investigation and review of the entire security footage revealed that there were no mystery ballots that were brought in from an unknown location and hidden under tables as has been reported by some. Video taken hours before shows the table being brought into the room into the room at 8:22 a.m. Nothing was underneath the table then. Around 10 p.m., with the room full of people, including official monitors and the media, video shows ballots that had already been opened but not counted placed in the boxes, sealed up, stored under the table. This was done because employees thought that they were done for the night and were closing up and ready to leave. When the counting continued into later in the night, those boxes were opened so that the ballots inside could then be counted.

8. The investigation remains open and is being investigated by the investigators in the Secretary of State's Office.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th day of December, 2020.

Frances Watson

FRANCES WATSON