

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

ROBERT L. PITTS, CHAIRMAN, FULTON
COUNTY BOARD OF COMMISSIONERS,

AND FULTON COUNTY BOARD OF
REGISTRATION AND ELECTIONS,

Petitioners,

v.

UNITED STATES OF AMERICA,

Respondent.

CIVIL ACTION:

1:26-MC-0177

DECLARATION OF NADINE WILLIAMS

I, Nadine Williams, hereby declare and state as follows:

1. I am over eighteen years old, and I have personal knowledge of the facts set forth in this Declaration. I could and would testify competently to those facts if called to be a witness in this case.

2. I am the Director of the Fulton County Department of Registration & Elections (“DRE”), where I have worked for 16 years in various roles within the Department.

3. I have served first as the Interim Director and now as the Director of the DRE for approximately 4 years. Prior to that, I was a Fulton County Elections Chief

from 2020 to 2022, and a Fulton County Elections Equipment Manager from 2010 to 2020.

4. As Director of the Fulton County Department of Registration and Elections, I manage and oversee the logistics of certification, delivery, and secure storage of election records.

5. The Fulton County Elections Hub and Operation Center (“Elections Hub”) is a 600,000-square-foot warehouse facility primarily used for Board of Registration and Elections (“BRE”) meetings, elections operations and storage. It opened in August of 2023 and is located at 5600 Campbellton Fairburn Road, Union City, GA 30213.

6. The Elections Hub also fulfills other Fulton County operational needs such as additional office space for Emergency Management, Information Technology, the Clerk of Courts, Real Estate & Asset Management, and evidence storage for the Sheriff’s Office, Marshal’s Service, and Fulton County Police Department.

7. The Fulton County DRE stores election records required by federal and state law in the 261,000 square feet of the Elections Hub that is dedicated to DRE staff, operations, and equipment.

8. After each election, DRE staff prepare records related to that election for storage and retention by the BRE, the Secretary of State of Georgia, and the Clerk

of the Fulton County Superior Court (“Clerk”), according to the type of document and the requirements for custody and retention under state election law.

9. Records designated for retention in the custody of the Clerk of the Superior Court include:

- ☐ Absentee ballot oath envelopes
- ☐ Absentee Ballot Recap Sheet(s)
- ☐ Absentee numbered list of voters
- ☐ Ballot Recap Sheet(s)
- ☐ Cast absentee, provisional, challenged, voided, and used ballots
- ☐ Copy of Consolidated Return Sheet(s)/Certification of Returns
- ☐ Copy of Chain of Custody form - Poll Manager
- ☐ Copy of Chain of Custody form - Technician Purposes
- ☐ Copy of Early Processing Monitor/Observer Oath
- ☐ Copy of Manager Oath
- ☐ Copy of Oath of Custodians and Deputy Custodians
- ☐ Copy of the Clerks’ Oath
- ☐ Copy of the Consolidated Assistance Oath
- ☐ Copy of thumb drive of official results
- ☐ Electronic file with Ballot Images
- ☐ Numbered List of Voters

- ☐ One copy of accumulated results tape
- ☐ Poll Pad Recap Sheet(s)
- ☐ Provisional Ballot Recap Sheet(s)
- ☐ Scanner Recap Sheet(s) (Advance Voting & Election Day with zero tapes)
- ☐ Statement of Votes Cast (SOVC)
- ☐ Touchscreen Recap Sheet(s) (Advance Voting & Election Day)

10. For records given to the custody of the Clerk of the Superior Court, the DRE prepares labels for each box giving a brief description of the type of record contained in the box, along with the date on which the election occurred.

11. The Clerk of the Superior Court maintains a separate warehouse storage area within the Elections Hub and Operations Center at 5600 Campbellton Fairburn Road.

12. The boxes of records stored on behalf of the BRE in the custody of the Clerk of the Superior Court are stored on wooden pallets to facilitate movement of multiple boxes at a time. The pallets are organized roughly by the date of the election that generated the records and are stored on industrial shelving in the Clerk's warehouse area of the Election Hub.

13. The Clerk of the Superior Court normally retains election records on behalf of the BRE for 24 months to comply with state and federal election record retention laws.

14. The November 2020 election records remained under seal beyond the usual 24-month period because they became the subject of litigation in the Fulton County Superior Court, which ordered those records to be sealed and retained beyond the normal statutory retention period.

15. On Wednesday, January 28, 2026, I was working remotely from my home when I was notified at approximately 12:32 p.m. that FBI agents were present at the Elections Hub, located at 5600 Campbellton Fairburn Road.

16. At approximately 12:37 p.m. on January 28, 2026, I contacted Fulton County Police Chief Wade Yates to notify him of the FBI's presence and advised him that no physical copy of a warrant had been presented to Elections staff.

17. I then drove to the Elections Hub and arrived at approximately 1:30 p.m. Upon entering the building and approaching the warehouse area used by the Clerk of the Superior Court for storage ("Clerk's warehouse area"), I observed approximately 25-30 individuals wearing jackets or vests marked "FBI" in a hallway outside the Clerk's warehouse area. I also observed the presence of county officials and staff.

18. I observed FBI personnel in the hallway outside the Clerk's warehouse area waiting for an amended search warrant containing a corrected description of the location to be searched. Once the amended search warrant was obtained and brought to the Elections Hub, I proceeded to the Clerk's warehouse area with FBI personnel,

the Superior Court Clerk Che Alexander, and staff from the Clerk's office and the DRE.

19. I remained in the Clerk's warehouse area during the warrant execution to assist FBI personnel and County staff with identifying boxes containing November 2020 election records, and personally observed the process whereby the FBI removed approximately 656 boxes from the premises.

20. Although a member of my staff noted 656 boxes on the FBI's log of boxes removed, the volume of boxes and the speed with which the records were loaded onto trucks for removal resulted in an estimated box count per pallet rather than an exact count. Based upon my observations, I would estimate closer to 700 boxes of election records were taken by the FBI on January 28, 2026.

21. The process to remove the boxes from the Clerk's warehouse area as I observed it was as follows: For each pallet of boxes containing November 2020 election records, FBI personnel placed a marker with an assigned number on each pallet, then photographed the pallet from multiple sides, noting the estimated number of boxes on each pallet, then removed the boxes from the Clerk's warehouse area using a forklift to place each pallet into a box truck.

22. At approximately 8:00 p.m., I observed a second group of individuals in civilian clothing without visible law enforcement markings arrive at the Clerk's warehouse area. I heard FBI personnel refer to the group of individuals as being

“from D.C.” FBI personnel also stated that Director of National Intelligence Tulsi Gabbard was one of the individuals in the group. These individuals were not introduced to Fulton County officials or staff.

23. I remained at the Elections Hub Clerk’s warehouse area until approximately 9:00 p.m. on January 28, 2026, when I heard FBI personnel inform Fulton County officials and staff that they had concluded the execution of their search warrant.

24. Shortly after 9:00 p.m. as I was leaving the Election Hub parking lot, I witnessed the box trucks leaving the parking lot.

25. To my knowledge, Fulton County officials and staff onsite at the Clerk’s warehouse area in the Elections Hub, on advice of County counsel, complied fully with instructions and requests from FBI personnel and assisted with the identification and processing of boxes containing November 2020 election records.

Pursuant to 28 U.S.C. §1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Executed this 3rd day of February, 2026 in Fulton County, Georgia.

A handwritten signature in blue ink, appearing to read "Nadine Williams", is written over a horizontal line.

Nadine Williams