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

NAACP, et al.,	*	
	*	
Plaintiffs,	*	
	*	Case No. 1:17-cv-01427-
v.	*	TCB-WSD-BBM
	*	
BRIAN KEMP, in his official capacity	*	CONSOLIDATED CASES
as Secretary of State for the State of	*	
Georgia,	*	
	*	
Defendant.	*	
,	*	
AUSTIN THOMPSON, et al.,	*	
,	*	
Plaintiffs,	*	
,	*	
v.	*	
	*	
BRIAN KEMP, in his official capacity	*	
as Secretary of State of the State of	*	
Georgia,	*	
<i>5</i> ,	*	
Defendant.	*	

## **DECLARATION OF TINA LUNSFORD**

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

1.

My name is Tina Lunsford. I am more than 21 years old and I am under no legal disability which would prevent me from giving this affidavit. I am giving this affidavit based on my personal knowledge.

2.

I am the Director of Registration and Elections for Henry County, Georgia. I have held this position since January 9, 2015. As Director, I manage a professional staff of eight. My responsibilities include preparing draft ballots with proper ballot patterns for thirty seven (37) voting precincts; recruiting and hiring 37 poll managers and 600 poll workers; arranging for delivery of 425 DRE (direct recording electronic) voting machines to Henry County's 37 precincts; supervising all aspects of early voting and absentee ballots beginning as early as April 7, 2018; and supervising all aspects of the General Primary/Nonpartisan General Election and general elections (and runoffs, if any).

3.

To hold a court-ordered Special Election parallel with the General Primary/Nonpartisan General Election would have a ripple effect not just to State House District 111 but also to State House Districts 73, 109, 110 and 130.

Henry County had a Special Election for HD 111 on January 9, 2018.

Potentially, voters who voted in the January 2018 Special Election would vote in a different State House district which would upset and confuse many voters.

4.

Furthermore, if a Special Election is held in conjunction with the General Election, affected voters could vote for one State House district in the May General Primary and a different State House district in November.

5.

It is also possible that some candidates who qualified between March 3 and 9 to run for state house seats in the General Primary on May 22, 2018 under the 2015 map might no longer reside in the districts for which they qualified to run were the 2012 map to be used.

6.

The estimated costs shown below are based on the fact that Henry County would have to revert to the 2012 state house lines or to court-ordered district lines. These estimated costs do not reflect any additional expenses for advanced voting or any run-off elections.

- Notices to be posted in legal organ
  - o Notice of Special Election \$785
  - o Logic & Accuracy testing notice \$30

- o Advanced voting schedule \$150
- o Intent to tabulate early \$30
- Mail notice to voters
  - o Precinct cards to voters \$6,720
  - o Mailing notification to affected households \$ 10,000
- Polling location expenses
  - o Transportation of equipment to and from \$1400
  - o 74 poll workers \$10,500
- Procure election supplies
  - o Supplies \$1100
- Procure ballots
  - o Ballot setup -\$ 250
  - o Provisional ballots \$9000
  - o Absentee by mail ballots \$5000
  - o Test deck − \$250
- Office Labor
  - o Proofing of ballot 6 hours \$500
  - o Redistricting all the affected voters by the 2015 change—15 days \$15,000
  - o L&A testing 4-6 days \$4000
  - Election night tabulation 5 hours \$1280
  - o Certifying the election 4 hours \$1000

The estimated total cost to hold a court-ordered Special Election with the General Primary/General Election would be \$66,995. This estimate is under the assumption that the Special Election would be on the same ballot as the General Primary or General Election. If held separately, the costs would triple.

8.

With respect to the notices identified in paragraph 7, if the special election were to be held in conjunction with the General Primary or General Election, the notice of special election would have to be posted 90 days before the election. If held separately, with different facilities, equipment, and poll workers, the notice must be posted at least 29 days in advance.

Notices to affected voters should go out no less than 60 days before a special election so that voters covered by the Uniformed and Overseas Citizens Absentee Voting Act are reached in timely fashion.

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

Executed this 21 day of March, 2018.

Jung hungfold Tina Lunsford