

# EXHIBIT 31

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

COAKLEY PENDERGRASS et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his official  
capacity as the Georgia Secretary of State;  
REBECCA N. SULLIVAN, in her official  
capacity as the Acting Chair of the State  
Election Board; SARA TINDALL  
GHAZAL, in her official capacity as a  
member of the State Election Board;  
MATTHEW MASHBURN, in his official  
capacity as a member of the State Election  
Board; and ANH LE, in her official  
capacity as a member of the State Election  
Board,

Defendants.

CIVIL ACTION FILE NO. \_\_\_\_\_

**DECLARATION OF ROBERT RICHARDS  
IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to 20 U.S.C. § 1746, I, Robert Richards, declare as follows:

1. My name is Robert Richards. I am over the age of 18, have personal knowledge of the facts stated in this declaration, and can competently testify to their truth.
2. I am a Black citizen of the United States and the State of Georgia.

3. I possess all the qualifications of a Georgia voter: I am a citizen, I am at least 18 years old, I am not serving a sentence for a felony conviction, I have not been found mentally incompetent by a judge, and I am a legal resident of Georgia.

4. I am specifically registered to vote at 2759 Carrick Ct., Powder Springs, GA 30127 in Cobb County, Georgia, which is located in Georgia's Fourteenth Congressional District under the newly enacted congressional plan.

5. I have previously voted in prior congressional elections in Georgia and I intend to vote in future congressional elections in Georgia.

DATED: <sup>12/16/2021</sup> \_\_\_\_\_

By:  \_\_\_\_\_

Robert Richards