

IN THE SUPERIOR COURT OF LONG COUNTY  
STATE OF GEORGIA

  
Sherry Long, Clerk  
Long County, Georgia

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BOBBY HARRISON SMITH,	)	
	)	
Petitioner,	)	
	)	
v.	)	Civil Action File No.:
	)	
LONG COUNTY BOARD OF	)	
ELECTIONS AND REGISTRATION,	)	
and TERESA L. ODUM, Candidate	)	
for Long County Probate Judge – June	)	
9, 2020,	)	
	)	
Respondents.	)	

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**PETITION TO CONTEST ELECTION RESULTS & REQUEST FOR NEW ELECTION  
JUNE 9, 2020 LONG COUNTY, GEORGIA PROBATE JUDGE ELECTION**

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**INTRODUCTION**

The June 9, 2020 Long County Probate Judge Election (the “Election”) was as unusual as they come. It was full of irregularities and errors that, in total, cast in doubt the Election’s result—a difference of only nine votes. These irregularities and errors include (1) individuals not residing in Long County voting in the Election, (2) missing ballots reappearing at a recount and uncertainty about if ballots had been counted twice, (3) absentee ballots never being sent to individuals that requested them and those individuals’ votes being rejected as they could not vote due to public health concerns, (4) eligible voters wrongly being turned away at the polls, (5) Long County election voters improperly using newly-purchased election machines causing voters to be wrongly turned away and their votes wrongly rejected. Because the irregularities, illegal votes, and wrongly rejected votes in the Election exceed the margin of victory of nine, the Election must be invalidated

and a new election held. Holding a new election in this case is indispensable to fostering public confidence in our electoral system, and upholding the cherished demographic principles that our country was founded upon.

### **PARTIES**

1.

Petitioner Bobby Harrison Smith (“Judge Smith”) is the current Probate Judge and Chief Magistrate Judge of Long County, Georgia. He is a resident of Long County, residing at 2946 Elim Church Road, NE, Ludowici, Georgia 31316. He was a candidate for re-election in the race for the June 9, 2020 Long County, Georgia Probate Judge seat. Pursuant to O.C.G.A. § 21-2-521, he is eligible to file this Petition.

2.

Respondent Long County Board of Elections and Registration (the “Long County Board”) is the superintendent that conducted the contested election, and resides at 459 South McDonald Street, P.O. Box 476, Ludowici, Georgia 31316.

3.

Respondent Teresa L. Odum (“Odum”) was the only candidate that opposed Judge Smith in the June 9, 2020 Long County Probate Judge Election (the “Election”). Odum resides at 1349 Buster Philips Road SE, Ludowici, Georgia 31316.

### **JURISDICTION & VENUE**

4.

Jurisdiction is proper in this Court, under O.C.G.A. § 21-2-523(a), as the county where Respondents the Long County Board and Odum presently reside.

5.

This Petition was timely filed with this Court. The Long County Board certified the Election results on June 26, 2020. This Petition was filed on July 1, 2020, within five days of the certification pursuant to O.C.G.A. § 21-1-524(a).

6.

Venue is proper in this Court.

7.

An affidavit executed by the Petitioner Judge Smith verifying this Petition is filed herewith as attached **Exhibit “A”**.

#### **FACTUAL BACKGROUND**

##### I. BACKGROUND OF ELECTION.

8.

Election day for the Election was on June 9, 2020.

9.

Judge Smith and Odum were the only candidates in the Election.

10.

The day following the Election, on June 10, 2020, a representative for Judge Smith requested a complete list of all people who voted absentee, early and on election day from the Long County Board. This list has yet to be provided.

11

The Election took place in very unusual times, principally a global pandemic fueled by COVID-19.

12.

In light of COVID-19 and the corresponding public health concerns, Secretary of State Brad Raffensperger ordered that all voters in Georgia be mailed absentee ballot applications, a rare and unprecedented feat.

13.

Additionally, in light of COVID-19 and its highly contagious and potentially deadly nature, many voters did not feel comfortable voting in-person.

14.

Many voters that applied for absentee ballots did not receive them. Because these voters did not feel comfortable going to the polls due to the public health concerns stemming from COVID-19, their votes in the Election were wrongly rejected.

15

After the initial count on election day, Judge Smith had 1,347 votes and Odum had 1,366 votes, giving Odum a 19 vote advantage and showing 2,792 votes had been cast in the Election.

16.

The following day, on June 11, 2020, the election numbers showed that Odum suddenly had a 22 vote advantage.

17

Because the vote difference was within one percent, under O.C.G.A. § 21-2-495, a recount took place.

18.

The recount took place on June 24, 2020.

19.

At or around 10:00 a.m. on the day of the recount, the election board attempted to turn on the machines.

20.

At this time, none of the election machines worked.

21.

After approximately 30 minutes and multiple rounds of troubleshooting, the election machines began to work. When the machines turned on, the election officials tested the machines.

22.

On both tests, the election machines indicated that Judge Smith had over 60% of the votes. Given this, the Long County Board requested that everyone watching the recount come back at 1:00 p.m.

23.

The recount recommenced, and lasted until 9:00 p.m. that night.

24.

When the recount was concluded, the new vote total was Judge Smith with 1,362 votes, and Odum with 1,364 votes, giving Odum a two vote advantage and showing 2,798 votes had been cast in the Election.

25.

Oddly and unexplainably, six additional votes had been found and cast in the recount than in the initial election count – 2,792 compared to 2,798.

26.

There were irregularities and errors as is shown by there being nine missing ballots and three unresolved ballot issues. Indeed, the total number of votes cast from election night did not match the total number of votes counted for the recount.

27.

Again, due to these errors and irregularities, the Long County Board instructed everyone that was present to watch the recount to go home, and to return the following day, June 25, 2020, at 1:00 p.m.

28.

The next day at 1:00 p.m., the Long County Board indicated that 16 more ballots were found, but the total number of ballots cast from the recount still did not match the total number of votes cast as reported on election night. And it was indicated by election officials that there was uncertainty about whether some ballots had been counted more than once.

29.

After this final exercise of the recount, the vote total was Judge Smith with 1,366 votes and Odum with 1,375 votes, creating a nine vote advantage for Odum and showing that 2,814 votes had now been cast in the Election.

30.

Sixteen more ballots had allegedly been found and counted in the second recount as compared to the first recount. Twenty-two more ballots had allegedly been found and counted in the second recount as compared to the initial election tally. These irregularities were unexplained and exceed the margin of victory of nine votes.

31.

The Long County Board certified these election results on June 26, 2020.

32.

Despite requesting the certified copies of the Long County electors list and the voter participation file for the Election from the Long County Board and the Secretary of State's Office, neither the Long County Board nor the Secretary of State's Office has provided these documents. Judge Smith needs these documents to fully examine and prove the errors that took place in administering the Election, and reserves the right to seek leave to amend this Petition to reflect the new facts and theories that are discovered upon review of these documents.

II. MECHANICS OF ELECTION.

33.

County election officials administer elections in Georgia.

34.

The Long County Board administered the Election.

35.

County election officials are responsible for properly administering, evaluating, and accepting or rejecting provisional and absentee ballots.

36.

The Long County Board breached this duty by wrongly accepting and rejecting multiple provisional and absentee ballots.

37.

County election officials are also responsible for determining whether voters reside within the county and if voters have moved out of the county, and, therefore, whether voters are eligible to vote in a respective election.

38.

When individuals reside outside of a county, they are ineligible to vote in that county and their votes should not be counted.

39.

When individuals reside in a county and are otherwise eligible to vote in that county, they should be allowed to vote in that county and their votes should be counted.

40.

The Long County Board wrongly allowed individuals that resided outside of Long County to vote in the Election, and wrongly-rejected votes from persons that resided in Long County and were otherwise eligible to vote in the Election.

41.

County election officials are also delegated the statutory and constitutional responsibility to allow all eligible voters to vote in an election that they seek to vote in, and to ensure that all eligible voters have a right to do so.

42.

The Long County Board wrongly rejected voters for numerous reasons, including by telling them that they could not vote because they had already voted in the Election when they had not already voted in the Election, by telling them that the machines did not work and telling them to

leave and by failing to send out absentee ballot applications and absentee ballots timely or at all. In no case were these eligible voters provided provisional ballots.

III. ILLEGAL VOTES: INELIGIBLE VOTERS THAT RESIDED OUTSIDE OF LONG COUNTY, BUT VOTED IN THE ELECTION.

43.

The Long County Board wrongly-accepted votes from individuals that no longer resided in Long County.

44.

Because these individuals were not eligible to vote in the Election, they cast illegal ballots.

**a. Voters that Live in Wayne County, But Illegally Voted in the Election**

45.

Tristen Pitts resides at 591 Tank Road, Jesup, Georgia 31545, which is in Wayne County, Georgia

46.

Tristen Pitts voted in the Election.

47.

Because Tristen Pitts did not reside in Long County, she was ineligible to vote in the Election, and her vote was illegal.

48.

Candi Pitts resides at 591 Tank Road, Jesup, Georgia 31545, which is in Wayne County, Georgia.

49.

Candi Pitts voted in the Election.

50.

Because Candi Pitts did not reside in Long County, she was ineligible to vote in the Election, and her vote was illegal.

51.

Jacob Pitts resides at 591 Tank Road, Jesup, Georgia 31545, which is in Wayne County, Georgia.

52.

Jacob Pitts voted in the Election.

53.

Because Jacob Pitts did not reside in Long County, he was ineligible to vote in the Election, and his vote was illegal.

54.

Saundra Whigham resides at 591 Tank Road, Jesup, Georgia 31545, which is in Wayne County, Georgia.

55.

Saundra Whigham voted in the Election.

56.

Because Saundra Whigham did not reside in Long County, he was ineligible to vote in the Election, and his vote was illegal.

57.

The Long County Board systematically allowed voters that did not reside in Long County to vote in the Election. These persons were ineligible to vote in the Election, and their votes in the Election were, therefore, illegal. The exact number of illegal voters is unknown at this stage,

and Judge Smith reserves the right to plead additional illegal votes, both in an amended petition under O.C.G.A. § 21-2-524(g) and at the hearing on this petition. Judge Smith puts Respondents on fair notice of this legal theory and facts in this Petition under O.C.G.A. § 21-2-524(e).

**b. Voters that Live in Additional Counties Other Than Long County, But Illegally Voted in the Election**

58.

Lori Marie Jenks resides at 107 Abbie Ln, Glennville, Georgia 30427, which is in Tattnall County, and illegally voted in the Election as she is not a resident of Long County and moved to Tattnall County at least as early as November 1, 2019.

59.

Bernita C. Berry resides at 624 E. 58<sup>th</sup> Street, Savannah, Georgia, which is in Chatham County, and illegally voted in the Election as she is not a resident of Long County and moved to Chatham County at least as early as June 1, 2016.

60.

Dwayne Allyn Reiere resides at 719 Milton Glisson Road, Claxton, Georgia 30417, which is in Evans County, and illegally voted in the Election as he is not a resident of Long County, and moved to Evans County at least as early as June 1, 2019.

61.

Heather Frankie Cloninger resides at 610 Madison Drive, Hinesville, Georgia, which is in Liberty County, and illegally voted in the Election as he is not a resident of Long County, and moved to Liberty County at least as early as June 1, 2019.

62.

Oliver V. Lunsford resides in Allenhurst, Georgia, which is in Liberty County, and illegally voted in the Election as he is not a resident of Long County and moved to Liberty County at least as early as February 1, 2017.

IV. IRREGULARITIES PLACING IN DOUBT THE ELECTION'S RESULT.

63.

The circumstances surrounding the Election were unusual.

64.

The Election involved the first major rollout of the newly purchased election machines.

65.

The Long County election poll workers had difficulties with these machines, which was shown by machine failures and poll workers wrongly rejecting numerous voters on these alleged failures.

66.

The Election also took place in the midst of a global pandemic, which resulted in Georgia Secretary of State Brad Raffensperger sending out absentee ballot applications to all Georgia voters.

67.

Many voters did not receive either the absentee ballot application and/or the absentee ballot, even though they requested one.

68.

Many voters did not receive their absentee ballot applications until a couple of days before the Election, even though they submitted their absentee ballot applications weeks earlier.

69.

Many absentee ballots were sent to improper addresses or old address, resulting in eligible voters never receiving the absentee ballot applications.

70.

Many voters also did not feel comfortable or safe voting in-person at their designated precinct.

71.

Thus, many individuals had their votes wrongly rejected as they were not able to vote if they did not receive their absentee ballot application and/or ballot.

72.

The irregular nature of the Election was underscored by the recount process during which ballots went missing, reappeared, and the votes casts never matched up.

73.

The irregularities surrounding the Election are limitless, and cast in doubt the results of the Election, necessitating that a new election take place to foster public confidence in the electoral system and to rectify the injustice resulting from a wrongly administered election that was sufficient to change the result of the underlying election.

V. IRREGULARITIES CAUSING VOTES TO BE WRONGLY REJECTED

**a. Irregularities Causing Jerri Reynolds' Vote to be Wrongly Rejected**

74.

Ms. Jerri Reynolds (“Ms. Reynolds”) went to the polls to vote on June 9, 2020.

75.

Upon attempting to vote, Long County Board poll workers told Ms. Reynolds that she had already voted.

76.

Ms. Reynolds had not already voted, and Ms. Reynolds told the poll worker that she had not already voted.

77.

Despite telling the poll workers that Ms. Reynolds had not already voted and the fact that she had not already voted, the Long County polls refused to let her vote.

78.

Ms. Reynolds was also not offered a provisional ballot.

79.

The Long County Board wrongfully rejected Ms. Reynolds' vote in the Election.

**b. Irregularities Causing Jimmy Reynolds' Vote to be Wrongly Rejected**

80.

Mr. Jimmie Reynolds ("Mr. Reynolds") went to the polls to vote on June 9, 2020.

81.

Upon attempting to vote, Long County Board poll workers told Mr. Reynolds that he had already voted.

82.

Mr. Reynolds had not already voted, and Mr. Reynolds told the poll worker that he had not already voted.

83.

Despite telling the poll workers that Mr. Reynolds had not already voted and the fact that he had not already voted, the Long County polls refused to let him vote.

84.

Mr. Reynolds was also not offered a provisional ballot.

85.

Due to irregularities, the Long County Board wrongfully rejected Mr. Reynolds' vote in the Election.

**c. Irregularities Causing Makayla Bray's Vote to be Wrongly Rejected.**

86.

Makayla Bray ("Ms. Bray") submitted an application for an absentee ballot. Despite Ms. Bray's request for an absentee ballot, the absentee ballot was never sent.

87.

Because Ms. Bray never received her requested absentee ballot, she was forced to go to the polls to vote in-person.

88.

When she arrived to the precinct to vote, the Long County Board poll workers told her that the machines were not working and told her that she could not vote.

89.

Ms. Bray was also not offered a provisional ballot.

90.

Despite Ms. Bray's attempt to vote on two occasions, she was turned away twice and her vote in the Election was wrongly rejected.

91.

Josiah Jeffers attempted to vote on June 9, 2020. Upon arriving at the polls, he was told that he could not vote in the Election because he had moved out of the precinct. Mr. Jeffers still resided in Long County, Georgia, and was eligible to vote in the Election and should have been allowed to vote provisionally and his vote should have ultimately been counted in the Election. The Long County Board wrongly rejected Mr. Jeffers vote.

92.

The Long County Board systematically wrongly rejected votes from eligible voters. These persons were eligible to vote in the Election, and the denial of their votes are wrongful rejections. The exact number of wrongly rejected votes is unknown at this stage, and Judge Smith reserves the right to plead additional wrongly rejected votes, both in an amended petition under O.C.G.A. § 21-2-524(g) and at the hearing on this petition. Judge Smith puts Respondents on fair notice of this legal theory and facts in this Petition under O.C.G.A. § 21-2-524(e).

**d. Irregularities Causing Absentee Ballot Applications, and Ballots and Provisional Ballots to be Wrongly Rejected or Counted.**

93.

The Long County Board systematically wrongly rejected absentee ballot applications and ballots.

94.

Judge Smith has requested all absentee ballots applications, absentee ballots and provisional ballots in the Election from the Long County Board. These documents have not been provided to Judge Smith.

95.

The Long County Board systematically wrongly rejected and illegally counted absentee ballots, provisional ballots and wrongly rejected absentee ballot applications. The exact number of wrongly rejected votes and illegal votes counted is unknown at this stage, and Judge Smith reserves the right to plead additional wrongly rejected votes, both in an amended petition under O.C.G.A. § 21-2-524(g) and at the hearing on this petition. Judge Smith puts Respondents on fair notice of this legal theory and facts in this Petition under O.C.G.A. § 21-2-524(e).

### LEGAL ANALYSIS

#### **Overview of Legal Framework for Election Contests**

96.

Judge Smith incorporates and re-alleges the statements made in Paragraphs 1 – 95 of this Petition.

97.

O.C.G.A. § 21-2-520 *et seq.* permits candidates to contest the result of primary elections in Georgia.

98.

O.C.G.A. § 21-2-522 establishes that elections may be contested on one or more of the following grounds:

- (1) Misconduct, fraud, or irregularity by any primary or election official or officials sufficient to change or place in doubt the result;
- (2) When the defendant is ineligible for the nomination or office in dispute;
- (3) When illegal votes have been received or legal votes rejected at the polls sufficient to change or place in doubt the result;

(4) For any error in counting the votes or declaring the result of the primary or election, if such error would change the result; or

(5) For any other cause which shows that another was the person legally nominated, elected, or eligible to compete in a run-off primary or election.

99.

O.C.G.A. § 21-2-527 establishes that a court must declare an election invalid and must call for a second election if one of the above showings are made.

**Count I: Irregularities by Election Officials**

100.

Judge Smith incorporates and re-alleges the statements made in Paragraphs 1 – 99 of this Petition.

101.

Irregularities by the Long County Board and its officials caused them to accept illegal votes, and to reject eligible votes.

102.

Failing to send out absentee ballots to individuals that applied for them, wrongly rejecting voters that attempted to vote in the Election, and improper and faulty use of the election machines were irregular acts committed by the Long County Board officials.

103.

Voters in counties other than Long County improperly voted in the Election, directly effecting the result of the Election.

104.

Voters that resided in Long County, and that attempted to vote in the Election were also wrongly rejected due to irregularities.

105.

In total, to-date at least 13 votes were found that were effected by irregularities, and more will be specifically identified once the requested documents are produced by the Long County Election Board.

106.

Only nine votes decided the Election.

107.

13 is greater than nine.

108.

Thus, 13 votes is sufficient to change or place in doubt the Election's result. The Election should be set aside and a new election ordered.

**Count II: Illegal Votes Cast in the Election**

109.

Judge Smith incorporates and re-alleges the statements made in Paragraphs 1 – 108 of this Petition.

110.

Failing to update the voter rolls caused voters that did not reside in Long County to vote in the Election.

111.

Individuals that did not reside in Long County were not eligible to vote in the Election.

112.

At least 9 individuals voted in the Election that did not reside in Long County.

113.

All 9 of these individuals were ineligible to vote in the Election, and cast illegal votes in the election.

114.

Only nine votes decided the Election.

115.

Nine is equal to or greater than nine.

116.

Thus, Nine votes is sufficient to change or place in doubt the Election's result. The Election should be set aside and a new election ordered.

**Count III: Wrongfully Rejected Votes**

117.

Judge Smith incorporates and re-alleges the statements made in Paragraphs 1 – 116 of this Petition.

118.

For various reasons, the Long County Board wrongly rejected at least four individuals from voting in the Election, and more will be specifically identified once the requested documents are produced by the Long County Election Board.

119.

At least nine other votes have been identified to be as a result of illegal votes, and affected by irregularities, making the total illegal, irregular, and wrongly rejected votes 13.

120

Only nine votes decided the Election.

121.

13 is greater than nine.

122.

Thus, 13 votes is sufficient to change or place in doubt the Election's result. The Election should be set aside and a new election ordered.

**Count IV: Odum is Ineligible for Office of the Long County Probate Judge**

123.

Judge Smith incorporates and re-alleges the statements made in Paragraphs 1 – 122 of this Petition.

124.

O.C.G.A. § 21-2-522(2) establishes that an election may be contested “[w]hen the defendant is ineligible for the nomination or office in dispute”.

125.

O.C.G.A. § 15-9-2(a)(2) states that candidates for the office of probate judge must be “a resident of the county in which the person seeks the office of judge of the probate court for at least two years prior to qualifying for election to the office and remains a resident of such county during the term of office”.

126.

Odum moved to Wayne County, Georgia in 2017.

127.

Memorializing this move, Odum voluntarily transferred her voter registration from Long County to Wayne County on August 25, 2017.

128.

Such transfer was done in accordance with established laws of this state and represents a prima facie case that Odum established domicile in Wayne County, Georgia on August 25, 2017, claiming residency at 255 Dreamland Street, Jesup, Georgia 31545.

129.

Notification of the registration change was sent to Odum's address on August 31, 2018 by the Wayne County Board of Elections.

130.

Odum signed and affirmed the November 6, 2018 voter certificate as a Wayne County, Georgia elector casting votes for local as well as state wide referendums, candidates, and actions contained on the November 6, 2018 ballot.

131.

Not until February 20, 2020 did Odum transfer her voter registration to Long County, Georgia from Wayne County, Georgia.

132.

Odum's voluntary expression of her continued intent to maintain domicile in Wayne County Georgia on November 6, 2018 demonstrates undisputed evidence that Wayne County, Georgia was Odum's domicile as of November 6, 2018.

133.

Thus, Odum was not domiciled in Long County, Georgia for two-years before qualifying for the 2020 election and, accordingly, was ineligible for the office of Probate Judge in the Election.

134.

The Election should be invalidated on this basis alone.

**Prayer for Relief**

WHEREFORE, Judge Smith respectfully requests that:

- (a) The June 9, 2020 Long County Probate Judge Election be declared invalid and a new election ordered;
- (b) The Petition be decided by the Court in a bench trial;
- (c) The Court award Judge Smith reasonable attorneys' fees, litigation expenses, and other costs incurred by filing this Petition against the Long County Board and Odum as permitted under O.C.G.A. § 21-2-529 and O.C.G.A. § 9-15-14;
- (d) The Court order the Long County Board to abide by specified protocols to be determined at a later date to ensure that the newly-ordered election is properly-administered;
- (e) The Court award Judge Smith such other, further, and different relief as the Court may deem just and proper.

Respectfully submitted this 1<sup>st</sup> day of July 2020.

/s/ Jake Evans

Jake Evans  
Georgia Bar No. 797018  
Robert S. Highsmith Jr.  
Georgia Bar No. 352777  
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(404) 817-8439 – Main  
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*Attorneys for Petitioner Bobby Harrison Smith*

**CERTIFICATE OF SERVICE FOR STATE ELECTION BOARD**

This is to certify that on this date, pursuant to O.C.G.A. § 21-2-524(b), this Petition was served on the Chairman of the State Election Board, Brad Raffensperger, by certified mail.

This 1<sup>st</sup> day of July 2020.

*/s/ Jake Evans*

Jake Evans  
Georgia Bar No. 797018

**HOLLAND & KNIGHT LLP**  
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Suite 1800  
Atlanta, Georgia 30309  
(404) 817-8439 – Main  
(404) 881-0470 – Facsimile

*Attorney for Petitioner Bobby Harrison Smith*

# **Exhibit A**

**IN THE SUPERIOR COURT OF LONG COUNTY  
STATE OF GEORGIA**

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BOBBY HARRISON SMITH,	)	
	)	
Petitioner,	)	
	)	
v.	)	Civil Action File No.:
	)	
LONG COUNTY BOARD OF	)	
ELECTIONS AND REGISTRATION,	)	
and TERESA L. ODUM, Candidate	)	
for Long County Probate Judge – June	)	
9, 2020,	)	
	)	
Respondents.	)	

---

**AFFIDAVIT OF BOBBY HARRISON SMITH**

1.

Personally appeared before the undersigned attesting officer, duly authorized to administer oaths, came Bobby Harrison Smith, who after being duly sworn, deposes and states the following:

2.

My name is Bobby Harrison Smith. I am over the age of twenty-one (21) years, I am suffering from no legal disabilities, and I am competent to make this Affidavit. I voluntarily and freely make this Affidavit of my own personal knowledge for any and all uses and purposes authorized by law.

3.

I reside at 2946 Elim Church Road, NE, Ludowici, Georgia 31316, which is in Long County, Georgia.

4.

I currently serve as the Probate and Chief Magistrate Judge of Long County, and have served in this capacity since January 2017.

5.

I sought re-election, and I was a candidate in the June 9, 2020 Election for Long County Probate Judge.

6.

I believe the facts in the Petition to Contest the Election Results & Request for New Election in the June 9, 2020 Long County, Georgia Probate Judge Election are true.

7.

According to the best of my knowledge and belief, the result of the June 9, 2020 Election for Probate Judge of Long County is illegal and the return thereof incorrect.

8.

The Petition to Contest the Election Results & Request for New Election in the June 9, 2020 Long County, Georgia Probate Judge Election is made in good faith.

[Signature on following page]

**FURTHER AFFIANT SAYETH NAUGHT**



\_\_\_\_\_  
Bobby Harrison Smith

Subscribed and sworn to before me  
this 17 day of July 2020.



\_\_\_\_\_  
Notary Public

My Commission Expires: 05/19/23