

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

THE TWELFTH CONGRESSIONAL)	
DISTRICT REPUBLICAN)	
COMMITTEE, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil No. 1:20-cv-00180-JRH-BKE
)	
BRADFORD J. RAFFENSPERGER,)	
et al,)	
)	
Defendants.)	
)	

NOTICE OF FILING

PLAINTIFFS, by counsel, give notice that they are filing the attached
Rebuttal Declaration of Alex Chilton in support of Plaintiffs' Emergency Motion
for Temporary Restraining Order and Preliminary Injunction.

Respectfully submitted,

**12th CONGRESSIONAL DISTRICT
REPUBLICAN COMMITTEE, et al.**

/s/ Christopher I. Kachouroff
Christopher I. Kachouroff, Esq.*
Patrick M. McSweeney, Esq.*

Notice of Filing - Declaration of Alex Chilton

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** Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2020, I electronically filed this document with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the attorneys of record:

/s/ Christopher I. Kachouroff
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Civil No. 1:20-cv-00180-JRH-BKE

DECLARATION OF ALEX CHILTON

I, Alex Chilton, declare the following pursuant to 28 U.S.C. § 1746 based on my information, knowledge, and belief.

1. My name is Alex Chilton and my company is Chilton, Gibbs & Associates, LLC.

2. I have been licensed in Georgia for 21 years and all of our staff investigators who work at Chilton Gibbs are licensed. I have worked in law enforcement in various capacities for 11 years. I have also testified in federal and state courts and have been qualified as an expert in law enforcement techniques.

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3. Chilton Gibbs provides professional investigative services that range from narcotics investigations, civil suit investigations, undercover operations, site security surveys and analysis, personal VIP protection, and many other services. We were retained by McSweeney, Cynkar & Kachouroff to effect service of process in this case. We were also tasked with investigating Richmond County's drop boxes.

4. As part of our investigation, our firm visited the drop box locations advertised by the Richmond county board of elections, conducted an interview of Lynn Bailey, the Richmond County Elections supervisor, and visited the drop box locations again.

5. I interviewed Ms. Bailey on Monday, December 14, 2020 and inquired about the security on the drop boxes. Ms. Bailey advised that the drop boxes were monitored with "Wyze" brand security cameras.

6. This is significant because the Wyze company is known as a budget-friendly, internet-connected home security camera system. Wyze makes other types of electronics such as home thermostats. Wyze brand security cameras (www.wyze.com) do not appear to be commercial grade security cameras. We could not find professional grade surveillance equipment. There is a vast difference

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between professional and consumer grade surveillance equipment. Wyze cameras are extremely cheap home security cameras intended for the consumer market. They range in price from \$20.00 to \$65.00.

7. Sheriff's offices routinely use professional grade cameras for surveillance in narcotics investigations which are more suited for monitoring the drop boxes.

8. Based on my review of the Wyze security camera specifications told to me by Lynn Bailey and to a reasonable degree of professional certainty, I would never deploy *any* Wyze camera for surveillance use in something so important as monitoring the integrity of an unattended outdoors ballot drop box.

9. I would at least use the same or better cameras deployed for routine narcotics investigations. The Wyze outdoor camera (its only outdoor model) would not produce the results that I would expect of a professional surveillance camera let alone serve as a reliable source for surveillance of something so important as a federal election.

10. Before meeting with Ms. Bailey, our firm did a site visit of every drop box on December 12, 2020. Out of the five drop boxes in Richmond County, only one drop box located at the main government building, 535 Telfair Street, Augusta, GA

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30901, was found to have visible surveillance. This was the only box that had any professional surveillance and that surveillance was provided by the building's general security cameras.

11. We could locate no cameras on any of the other drop boxes and we looked carefully for them. We would expect cameras to be visible as a representation of authority to deter fraudulent activity.

12. The Absentee ballot drop box located at 4335 Windsor Spring Rd at Diamond Lakes Regional Park was located at 103 Diamond Lakes Way in front of the Robert Howard Community Center, not at the actual Diamond Lakes Regional Park. While it is on the road that leads to the park, it was not precisely at the park.

13. The box located at 2463 Golden Camp Road was located behind a brick pillar at the building's front entrance, not in clear view from the front of the structure.

14. The fourth box was at 3463 Peach Orchard Road at the City of Augusta Services Center. No direct surveillance cameras were overlooking this drop box.

15. On a different issue, Ms. Bailey told me that she could accept a batch of absentee ballot applications dropped off by a third person as not being illegal.

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16. I also spoke with an election supervisor in a county within the Southern district. This person told me that their county did not use drop boxes because they were ripe for fraud.

17. This person also advised that the crux of the confusion concerning absentee ballots and how they are processed was the advice given by the State Elections Board. Now, the State Elections Board offers no advice other than directing election officials to read the Election Law Code.

All of the statements above are made to the best of my knowledge, information, and belief.

Dated: December 16, 2020

12 / 16 / 2020

Alex Chilton

Alex Chilton

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Signature Certificate

Document Ref.: WDEUV-LYCAA-BDWBN-EJT3N

Document signed by:

	<p>Alex Chilton Verified E-mail: jalexchilton1835@gmail.com</p>	 
<p>IP: 75.90.19.30 Date: 17 Dec 2020 03:39:38 UTC</p>		

Document completed by all parties on:
17 Dec 2020 03:39:38 UTC

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