

**From:** Joshua Findlay <jfindlay@donaldtrump.com>  
**Sent:** Monday, December 28, 2020 10:54 PM  
**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>  
**Cc:** Bill Stepien <BStepien@donaldtrump.com>  
**Subject:** Re: Georgia Update

Hi All,

I hope everyone had a great Christmas! Here is the most recent Georgia update:

-The court still has not provided any updates in the Trump election contest lawsuit. It has been almost a month since the case was filed, and the court has shown no urgency in doing anything to move this forward. As a result, a lot of people on the ground are not really tracking the progress of the suit anymore. The court's delay seems to be having an interesting effect in that it has almost frozen a narrative in many people's minds. For those that want to believe in election fraud, the numbers the campaign alleges in the lawsuit still represent actual fraud because the court has not ruled otherwise. For those that do not believe in fraud, the court's delay shows that it does not take the allegations seriously.

-Additionally, the SOS stated at one point previously that the signature match audit would be completed today, but the campaign has not seen any results. In fact, the only record the campaign has of the audit is what has been done in Cobb County, so we do not know how much has been done throughout the state. The campaign has sent people to try to observe the audit, but people have not gotten close enough to have real, meaningful access. The Georgia Bureau of Investigation is involved, so the results should be reliable, but it does not look like the campaign will have any independent verification.

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>  
**Sent:** Wednesday, December 23, 2020 11:36 PM  
**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>

**Cc:** Bill Stepien <BStepien@donaldtrump.com>

**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-The Georgia house Government Affairs Committee held a hearing on the November elections which the Secretary of State attended. This was a kind of do-over between the SOS and the Speaker of the House, when the SOS skipped the last hearing that the House held. The most notable part of the hearing was that the SOS stated that the state needs to end the no-excuse absentee voting system because it opens the door to potential illegal voting. He said this even while still claiming that there was no fraud in the November election. In a positive move, the SOS also stated that the state should to voter ID for absentee verification, as opposed to signature match, because signature match is too hard to apply. Of course, if signature match is so hard to apply, it doesn't make sense that he waited almost two months to start a signature audit.

-The GBI and the SOS's office continue with the signature match audit in Cobb County. We still do not have any details on the result of the audit, but the SOS did state that it will likely end next week. The SOS has already stated that the audit will not affect the election results and that the purpose is to provide confidence in the election process, so a lot of Georgians do not believe that the audit will be truly independent, even if the GBI is involved. Both the Governor and the SOS have already publicly said that it looks like Cobb County was doing signature match correctly, even without the results. It is unclear at this point whether the GBI will be involved with the statewide portion of the audit, or just the University of Georgia.

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>

**Sent:** Tuesday, December 22, 2020 10:42 PM

**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>

**Cc:** Bill Stepien <BStepien@donaldtrump.com>

**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-Cobb County has started its signature match audit with the Georgia Bureau of Investigation, and Mark Meadows made a surprise visit to Cobb County today to observe. The GBI and investigative office of the SOS are auditing about 10% of the ballots in Cobb County. This amounts to an audit of about 10% of the mail-in ballots. This number was recommended by experts at the University of Georgia as an amount that could determine the accuracy of the verification process in the November election. The investigators are "looking for similarities" between the signatures on the ballot envelopes and signatures from public records, such as driver's licenses. The SOS's office has been extremely quiet about the details, so we don't know when we can expect to hear the results at this point.

-Mark Meadows made a surprise visit to Cobb County today to try to observe the audit, but he was not allowed inside. As a result, he only stayed for about 20 minutes, met with the SOS's team, and then left. I know he met with Jordan Fuchs, the Deputy SOS, and someone that has been very difficult for us to deal with, but it sounds like she at least tried to be helpful today.

-Today plaintiffs in a Michigan lawsuit amended their complaint in federal court to allege the President Trump and the RNC are violating the Third Enforcement Act of 1971 or the "Ku Klux Klan Act" by conspiring to deny minorities the right to vote. The complaint alleges that the defendants are working to overturn the results of the 2020 Presidential election by disenfranchising voters in primarily black cities such as Detroit and Atlanta. Regardless of the validity of the lawsuit, anything invoking the KKK and voting rights is politically explosive in Georgia, and this will likely be used by the Democrats going forward.

Thanks,

Josh

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**From:** Joshua Findlay <[jfindlay@donaldtrump.com](mailto:jfindlay@donaldtrump.com)>

**Sent:** Monday, December 21, 2020 10:50 PM

**To:** Matthew Morgan <[mmorgan@donaldtrump.com](mailto:mmorgan@donaldtrump.com)>; Justin Clark

<jclark@donaldtrump.com>

**Cc:** Bill Stepien <BStepien@donaldtrump.com>

**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-Today the SOS announced that he would send letters to 8,000 voters that have requested absentee ballots for the Senate race that may live in other states. We do not know the criteria that he used to decide who would get the letters, or how likely it is that any of these people actually live in other states. That the SOS is doing this now, but did not do so in November, has Trump supporters fired up because they believe that many ineligible out of state voters voted in November. The SOS is now in a difficult spot, since any time he does something for the runoff that he should have done in November as well, it bolsters the narrative on the ground that ineligible people voted, that the SOS did do enough to deter them from voting, and that if he would have taken the steps he is taking now, the election would have come out differently.

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>

**Sent:** Sunday, December 20, 2020 11:15 PM

**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>

**Cc:** Bill Stepien <BStepien@donaldtrump.com>

**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-Today the 11th Circuit rejected a request by the GAGOP, NRSC, and the Senate campaigns for the SOS and State BOE to implement meaningful signature match. The court rejected the request because the plaintiffs sued state entities and the plaintiffs made an insufficient showing of injury "traceable to, and redressable by, the state."

Although the campaign was not a party to this lawsuit, it is relevant to the campaign because the decision does not address how the signature match was unevenly applied at the county level across the state. For example, over 100 counties did not reject any ballots. Additionally, two large, populous, majority Democrat counties (Douglas and Rockdale) did not reject any ballots. The 11th Circuit's order does nothing to damage the narrative that signature match is still an issue as applied in the counties.

Thanks,

Josh

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**From:** Joshua Findlay <[jfindlay@donaldtrump.com](mailto:jfindlay@donaldtrump.com)>  
**Sent:** Sunday, December 20, 2020 12:44 AM  
**To:** Matthew Morgan <[mmorgan@donaldtrump.com](mailto:mmorgan@donaldtrump.com)>; Justin Clark <[jclark@donaldtrump.com](mailto:jclark@donaldtrump.com)>  
**Cc:** Bill Stepien <[BStepien@donaldtrump.com](mailto:BStepien@donaldtrump.com)>  
**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-It looks like the SOS will partner with the Georgia Bureau of Investigation and the University of Georgia to perform the statewide signature audit. It is a little bit unclear what role each organization will play, but the SOS described the University's role as that of performing a "study" on signature match. Because the university is so liberal, the GBI will at least give some credibility to the audit. However, the SOS has already said that the results of the audit will have no bearing on the results of the November election.

Thanks,

Josh

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**From:** Joshua Findlay <[jfindlay@donaldtrump.com](mailto:jfindlay@donaldtrump.com)>  
**Sent:** Friday, December 18, 2020 10:24 PM  
**To:** Matthew Morgan <[mmorgan@donaldtrump.com](mailto:mmorgan@donaldtrump.com)>; Justin Clark <[jclark@donaldtrump.com](mailto:jclark@donaldtrump.com)>

**Cc:** Bill Stepien <BStepien@donaldtrump.com>

**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-Two Republican poll workers in Fulton County have been fired for speaking out about voting irregularities in the county during the November election. At least one of the workers appeared at both hearings of the legislature on problems with the election and was part of Rudy's presentation. The SOS publicly condemned the firing, stating that even though his office has found nothing wrong with the election, people should still be able to speak about what they see without fear of reprisal.

-It looks like there have still been no new updates on a hearing in the election contest. At this point everyone is just waiting to hear something out of Fulton County, and all but the attorneys involved have given up hope of anything coming of this. Up until this week a lot of people thought that if there was a hearing in the contest, it would give the campaign a chance to present its best case of voter fraud, even if there is not enough evidence to overturn the election. However, with the Electoral College voting on Monday, the enthusiasm of a hearing lessens with every day that passes. People are still fired up about the election, but they are getting resigned to the fact that the contest will not affect anything.

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>

**Sent:** Thursday, December 17, 2020 9:47 PM

**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>

**Cc:** Bill Stepien <BStepien@donaldtrump.com>

**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-It sounds like SOS is going to use a third party to conduct the statewide signature audit. Most people agree that this would be a good thing, since no one in the state trusts the SOS at this point. The SOS is still not forthcoming on when the audit will start or how many ballots will be audited. However, the SOS's reason for the audit is to provide confidence in the system for the runoff election, so the audit will likely have to begin soon.

-A federal judge in the Northern District of Georgia dismissed a suit brought by the GAGOP and the NRSC regarding signature match. One interesting part of the lawsuit for the campaign is that the plaintiffs alleged issues with signature match because some counties rejected an impossibly low number of signatures based on previous election results. The AG's office argued successfully that the laws were sufficiently different regarding signatures this cycle that it is impossible to compare with past elections. Additionally, as we have seen previously in Georgia, the judge ruled that the plaintiffs lacked standing because there has been no actual harm yet, apparently seeing no issues with the signature match process.

-A federal judge in the Southern District of Georgia also dismissed the 12th District lawsuit with the Trump electors. The lawsuit alleged harm from expanded rules that the SOS put in place for the November elections, such as drop boxes and expanded voting. The judge ruled that any claims from expanded rules that the SOS put in place are "highly speculative." While both of these cases are about election rules for the Senate race, the judges seemed unpersuaded by arguments that the process that was used in the November election was bad. I don't think this affects the campaign's or the President's narratives of the election in any way, it does give legal strength to defenders of the process.

Thanks,

Josh

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**From:** Joshua Findlay <[jfindlay@donaldtrump.com](mailto:jfindlay@donaldtrump.com)>  
**Sent:** Wednesday, December 16, 2020 10:23 PM  
**To:** Matthew Morgan <[mmorgan@donaldtrump.com](mailto:mmorgan@donaldtrump.com)>; Justin Clark <[jclark@donaldtrump.com](mailto:jclark@donaldtrump.com)>  
**Cc:** Bill Stepien <[BStepien@donaldtrump.com](mailto:BStepien@donaldtrump.com)>

**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-Over 100,000 people that did not vote in the Presidential election have requested ballots for the Senate runoff. This means that main-in ballots and signature match will continue to play a key role in election narratives in Georgia. As a result, fights have begun about how to manage these ballots going forward. This will not likely change things for the Presidential race, but depending on how things shake out, it could affect how the President can message his race.

-The Georgia Secretary of State announced this evening that he is expanding the signature match audit from Cobb County to the whole state. From what I can tell, he is expanding the audit because he wants to take that cloud away from any election results with the Senate race, and to retroactively minimize doubt about the Presidential race. Because it is in his interest to talk about an election with no errors, most people do not think this will be a thorough or transparent audit. The SOS announced that he would be doing a Cobb County audit earlier this week, but no one still knows what the audit will look like. Just this evening the team was on the phone with an attorney in the SOS office, and he did not provide any information.

-Two Trump Presidential Electors and some others from the Augusta area filed a lawsuit against the SOS asking him to direct the counties to implement measures for signature match for the Senate runoff. Additionally, it sounds like the NRSC is going to file a similar suit in the next few days asking the SOS to implement two-member signature review panels in each county. While these lawsuits will not do anything to change the results of the Trump election, the results could help the narrative that the procedures in the November election were faulty.

-The SOS stated today that Trump lost the November election "because he got outworked" and had a faulty election strategy. Specifically, he said the following:

"[Trump] did well in many of the rural areas, but he didn't do well in the metro region. It's really his whole campaign strategy and at the end of the day, our job as secretary of state is to make sure we oversee elections, make sure that they're honest and fair," Raffensperger said. "The job of a political party – in this case, the Republican Party – is



to raise money and get out the vote and they got outworked."

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>  
**Sent:** Tuesday, December 15, 2020 10:55 PM  
**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>  
**Cc:** Bill Stepien <BStepien@donaldtrump.com>  
**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-There was not a lot of real news out of Georgia today. Some of the lawyers in the election contest case believe they will get an update on the case tomorrow. They are hoping for a hearing date but are not sure if that will be the case. The SOS made negative news again by calling Senators Perdue and Loeffler "embarrassing" for requesting data that they already have and then criticizing the SOS for not providing it. There were no new updates in the Coffee County lawsuit nor in the signature match audit in Cobb County.

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>  
**Sent:** Monday, December 14, 2020 9:43 PM  
**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>  
**Cc:** Bill Stepien <BStepien@donaldtrump.com>  
**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-The SOS ordered a full signature match audit with the GBI in Cobb County. The SOS said that he did it to restore Georgia's confidence in the election, but a lot of things about it don't make sense. It is also definitely not designed to help the President, although restoring confidence may help the Senators if this gets completed in time. First, he is ordering it six weeks after the election. Second, he is ordering it in one county known for running pretty good elections which already has a higher rejection rate. This seems like another instance of the SOS trying to cover himself retroactively, while doing nothing to help the President.

-I spoke with an attorney who filed the Coffee County case on behalf of the campaign. The theory is that because Coffee County refused to certify the correct election results, the SOS could not actually certify the election. The relief they are asking for will be pretty difficult. I believe they are asking for the election to be overturned because of "gross irregularities." I have not seen copies of the paperwork yet, but the attorneys are enthusiastic.

-All went well with the Presidential Electors in Georgia today. The electors met at the capitol at noon and voted as legally as possible under the circumstances. They did have to replace a few electors, and they do not have the letter from the government to make the replacements official. However, there were lawyers there to make the process as credible as possible. The Certificates of Vote were mailed out this afternoon.

Thanks,

Josh

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**From:** Joshua Findlay <[jfindlay@donaldtrump.com](mailto:jfindlay@donaldtrump.com)>  
**Sent:** Sunday, December 13, 2020 9:45 PM  
**To:** Matthew Morgan <[mmorgan@donaldtrump.com](mailto:mmorgan@donaldtrump.com)>; Justin Clark <[jclark@donaldtrump.com](mailto:jclark@donaldtrump.com)>  
**Cc:** Bill Stepien <[BStepien@donaldtrump.com](mailto:BStepien@donaldtrump.com)>  
**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-The Supreme Court of Georgia dismissed the appeal from the campaign on the election contest on jurisdictional grounds. The campaign argued that the Fulton County judge that ordered that the case be heard "in the normal course" was not the proper judge to make such an order. However, the Supreme Court affirmed that the campaign did not make a motion for another judge and that the Fulton County judge did not issue an order that can be appealed.

-Regarding the Coffee County issue, Robert Sinners and a couple of lawyers went down yesterday and spoke with officials on the ground. The officials confirmed that they reached out the SOS's office about counting irregularities multiple times before the recount, but they heard no response. That is why they wrote the letter to the SOS stating that they could not certify the election. Interestingly, both the Republicans and the Democrats on the BOE signed on to the letter. Robert and the lawyers gathered multiple affidavits, and Robert said that they filed a lawsuit in Fulton County suing the SOS and Coffee County. He believes the campaign is also a plaintiff in the suit, but he has no more details. He will try to find out more before tomorrow.

-I have been working with Robert on the electors, and everything should be set for them to vote tomorrow. Two electors will not appear, but we have identified two replacements. Additionally, Robert has a couple of attorneys on the ground helping him, and they should be able to make the replacements legally and serve as additional replacement electors should others fail to appear. The lawyers are GOP District Chairs and I know one well-enough to trust that he will do the job. Moreover, there are two State Senators, including the Senate Majority Leader that are helping shepherd the process through the capitol. They have assured that the electors have access to whatever they need and that they will have the privacy to finish the vote. Robert and I will talk again tomorrow, but as of tonight, everything seems on track.

Thanks,

Josh

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**From:** Joshua Findlay <[jfindlay@donaldtrump.com](mailto:jfindlay@donaldtrump.com)>  
**Sent:** Saturday, December 12, 2020 10:32 PM  
**To:** Matthew Morgan <[mmorgan@donaldtrump.com](mailto:mmorgan@donaldtrump.com)>; Justin Clark <[jclark@donaldtrump.com](mailto:jclark@donaldtrump.com)>  
**Cc:** Bill Stepien <[BStepien@donaldtrump.com](mailto:BStepien@donaldtrump.com)>

**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-The campaign filed an appeal to the Georgia Supreme Court in the election contest asking for a resolution of the case before Monday. The case is currently pending in Fulton County Superior Court, and earlier this week the judge in Fulton County issued an order stating that the case would be heard "in the normal course," which means that it will not be resolved any time soon. The campaign has not heard anything from the Supreme Court regarding the appeal.

-Regarding the Coffee County issue, the SOS pursued its investigation by going to the BOE and "raiding the machines" with Dominion representatives to try to determine what happened with the machines. Apparently the SOS appeared yesterday at the BOE offices and took the machines, to the dismay of all of the Coffee County officials, both Republican and Democrat. The county officials feel that they followed the proper procedures and asked the SOS for help when they had an issue. However, the SOS's office has been trying to place blame on the county officials, instead of trying to resolve any issues. The county officials believe the SOS took the machines in an effort to place blame on the county and take away the ability of the county to dispute that. Robert Sinners went to Coffee County with some attorneys to investigate and prepare affidavits.

-Things are getting on track with Georgia electors. Roman has placed Robert Sinners in charge of this on the ground, and Sinners has confirmed 10 of 16 electors for Monday. Two will not likely appear for various reasons, but he is working on finding replacements. He is also aware of replacement procedures and updating documents to reflect replacements. Under state law, replacements must be chosen by the electors in attendance at the meeting and then receive a letter confirming their replacement from the Governor. Our replacements will not likely receive that letter, but the team will otherwise follow the process perfectly. I know that some people on the ground are frustrated at a lack of communication from Mike Roman, but I am working with Robert to help the vote happen.

Thanks,

Josh

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**From:** Joshua Findlay <[jfindlay@donaldtrump.com](mailto:jfindlay@donaldtrump.com)>  
**Sent:** Friday, December 11, 2020 11:16 PM  
**To:** Matthew Morgan <[mmorgan@donaldtrump.com](mailto:mmorgan@donaldtrump.com)>; Justin Clark <[jclark@donaldtrump.com](mailto:jclark@donaldtrump.com)>  
**Cc:** Bill Stepien <[BStepien@donaldtrump.com](mailto:BStepien@donaldtrump.com)>  
**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-The court still has not scheduled a hearing in the campaign's election contest lawsuit. Given the Supreme Court's decision this afternoon, the focus will come more on the contest, which has largely stayed out of the news so far. Because the contest has stayed out of the focus of the news due to more outlandish cases, the ineligible voters alleged in the suit have not been closely scrutinized. Given the way the Democrats successfully delegitimized a lot of the alleged ineligible voters in Rudy's hearing yesterday, there is some concern among Republicans that there is not much substance to the contest, and it may end in another tough loss. This is frustrating to some because people know there was a lot of abuse in Georgia, but the attention goes to repeated cases getting dismissed.

-The transfer of elector responsibility was smooth, but things have been a little chaotic since the transfer. Rudy gave Mike Roman responsibility for getting the electors to vote on Monday, but Chairman Shafer called me at 10:30 tonight saying that he had heard nothing from Roman and does not know what is going on. Roman is on the ground in Georgia, so they should be able to get this coordinated pretty easily, but I will be monitoring everything tomorrow.

Thanks,

Josh

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**From:** Joshua Findlay <[jfindlay@donaldtrump.com](mailto:jfindlay@donaldtrump.com)>  
**Sent:** Thursday, December 10, 2020 10:27 PM  
**To:** Matthew Morgan <[mmorgan@donaldtrump.com](mailto:mmorgan@donaldtrump.com)>; Justin Clark <[jclark@donaldtrump.com](mailto:jclark@donaldtrump.com)>

**Cc:** Bill Stepien <BStepien@donaldtrump.com>

**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-The Georgia House Government Affairs Committee held a hearing today on the election. Rudy Giuliani appeared via video conference, causing some fireworks. He again showed the video of the ballots in suitcases in Fulton County, and at one point said that it looked like election workers were handing out dope, not just ballots. The person that might have taken it the worst today was Matt Braynard. The Democrat representatives looked into his data and showed flaws with his lists of voters who were out of state and supposedly residing at PO boxes.

-The SOS's office did not appear at the hearing today, even though they did appear at the Senate's hearings last week. This prompted the Speaker of the House to say that the SOS should be chosen by the General Assembly and that he would propose a constitutional amendment to do just that. This is as much about the Speaker's disdain for Raffensperger as it is for his support of Trump.

-The SOS's office has announced that they are going to investigate Coffee County over its election issues. Coffee County is alleging publicly that Dominion caused their inability to accurately count numbers. From the comments of the SOS, they are pushing back on this narrative, and I don't believe the investigation will be impartial or accurate. This seems like it will be another case where the SOS is mostly concerned with showing the election was perfect.

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>

**Sent:** Wednesday, December 9, 2020 8:48 PM

**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>

**Cc:** Bill Stepien <BStepien@donaldtrump.com>

**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-Tomorrow the Georgia Oversight Committee will hold hearings similar to the hearings held by the Senate last week. Even many of the witnesses will be the same. The first hearing will begin at 9:00 a.m., with Ray Smith expected to speak for the campaign at about 11:00 a.m. Then, beginning at 2:00 p.m. poll workers and observers will testify. Because many of the names are similar to those last week, I do not anticipate this to be too crazy, but one never knows.

-Today the Georgia Attorney General called the Texas lawsuit "Constitutionally, legally, and factually wrong." I believe this earned the AG a call from the President warning him not to rally other Republicans against the suit. While Carr is on the Lawyers for Trump Advisory Board, this is not that shocking. He has a close relationship with Kemp and LG Geoff Duncan and I would not be surprised if this was to support them as much as anything else.

-The Coffee County issue yesterday has generated more interest in the possibility that counties were counting to the Election Day totals during the audit. The team on the ground is still calling through counties trying to find people that will discuss any differences between the Election Day and audit results. There are some additional leads that we hope to pursue further tomorrow. However, as I have written about previously, many people just do not want to discuss this.

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>  
**Sent:** Tuesday, December 8, 2020 11:07 PM  
**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>  
**Cc:** Bill Stepien <BStepien@donaldtrump.com>  
**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-The big issue from today following the SOS and Governor's certification yesterday was that Coffee County, small county in middle Georgia, wrote a letter to the SOS stating that it could not certify its elections because it got different numbers for the Election Day count, the audit, and the recount. As a result, it sent the Election Day results to the SOS as the official results. This is significant because the Election Day results netted 18 fewer results for President Trump. If many counties did this, it would be an issue. To confirm, we contacted several friendly counties to determine how their Election Day, audit, and recount numbers varied, if at all.

In total we were able to have conversations with five friendly counties. Of the five, two had results that did not change from election Day through the audit and the recount. Of the other three, all had the same totals on Election Day and on the audit. However, they did have changes from Election Day and the recount. Forsyth County was +1 for Trump and +5 for Biden in the recount. Jackson County was +5 for Trump in the recount. Walton County was -3 for Trump and +1 for Biden in the recount. Unlike Coffee County, all of the counties certified the recount results with the SOS as the official election results.

If I were looking for issues, the most interesting part of this is that the hand recount matched up in every county, while the machine recount varied. This is a small sample, but we were concerned during the audit with counties counting toward their Election Day results. There was an incentive to have those numbers match exactly, even though that is unlikely when dealing with thousands of ballots by hand. We may have more of that even with the counties that reported some differences. I think Coffee County is an outlier in that it admitted not being able to find 185 ballots at one point. I think counties risk a lot at this point by reporting any significant difference.

-It sounds like the U.S. Senate is considering holding hearings on the election in Georgia as early as this Thursday. A couple of members of the U.S. House were asking about where to get the campaign's most reliable lists for ineligible voters that voted in Georgia. I know there are some problems with the data, but I pointed them to the exhibits in the campaign's election challenge, without guaranteeing their accuracy. If anyone has any other thoughts on items to share, please let me know.

Thanks,



Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>  
**Sent:** Monday, December 7, 2020 10:01 PM  
**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>  
**Cc:** Bill Stepien <BStepien@donaldtrump.com>  
**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia Update:

-Today the SOS recertified the election results, with the final total being a 11,779 vote advantage for Joe Biden. This made up a few more votes from the audit, but not many. This was to be expected considering this was just a machine retabulation of ballots.

-Sidney Powell's lawsuit was dismissed at a hearing today in Atlanta. The judge did not rule on the merits of the case, but rather that the plaintiffs in the suit did not have standing and that the case did not belong in federal court. The judge did comment that the plaintiffs were "seeking the most extraordinary relief ever sought in any federal court in connection with an election," in seeking to overturn the election. He also noted that it was unusual to bring a case alleging that a Republican Secretary of State and a Republican Governor would allow election fraud that would favor a Democrat candidate.

-This afternoon the filing fees were paid and the Case Information Form was completed so that the Trump Campaign/Shafer lawsuit was officially filed.

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>  
**Sent:** Sunday, December 6, 2020 10:39 PM  
**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>

**Cc:** Bill Stepien <BStepien@donaldtrump.com>

**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-Today four members of the state legislature asked Governor Kemp to call a special session of the state legislature, which the Governor immediately denied. He put out a statement saying that a special session to select an alternate slate of electors is unconstitutional and can only be used when an election cannot be held.

-The Lieutenant Governor joined this statement, and doubled down on the morning shows, saying that doing this would "overturn the will of the people." This is significant because the LG in Georgia has real legislative power in the senate. Based on what I have heard, most Senators do not want to be put in the position of choosing alternate electors, even though they want to give all of the tools necessary to investigate the election. This statement was likely the LG shielding the majority of members that do not want to vote on alternate electors from being put in that position.

-The most interesting statement of the day was from Lara Trump, when she stated that Governor Kemp owes his position to Donald Trump, and it "would be nice if he reciprocated in some way." The Governor and his team absolutely do not believe they owe anything to the President, so these were especially provocative words.

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>

**Sent:** Saturday, December 5, 2020 11:44 PM

**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>

**Cc:** Bill Stepien <BStepien@donaldtrump.com>

**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia Update:

-President Trump held an event in Georgia today, and the feedback was largely positive from the activists, but many of the elected officials were not thrilled. The day started off well when the President called Governor Kemp. Following the conversation, the governor said it was the best conversation he has had with the President in about a year. On the call the Governor explained to the President that he would call a special session of the legislature if it would be productive, but he did not think it would be. At the rally, the President said that the Governor could stop the steal of the election if he "knew what the hell he was doing." He also suggested that Doug Collins should challenge Kemp in 2022 for Governor. The Governor was not in attendance.

-Lin Wood's lawsuit was dismissed unanimously 3-0 in the 11th Circuit today. In the lawsuit, Wood had asked that the state delay certification of the election results, and the court ruled that issue moot, since the SOS has already certified. The court also ruled that Wood did not have standing to bring the suit. Here is a link to the decision:

<https://assets.documentcloud.org/documents/7334748/12-5-20-11th-Circuit-Opinion-Wood-v-Raffensperger.pdf>

-Because the 11th Circuit denied Sidney Powell's lawsuit yesterday, that suit is back in the district court tomorrow and a hearing is scheduled for 10:00 a.m.

-The SOS announced that the Georgia Bureau of Investigation will aid his office in the investigations into voter fraud. The Governor is also in agreement with this, he and may have been the first to suggest it publicly. I think this a good thing overall, because I actually have doubts about how well the SOS is investigating anything. His incentive is to say that there was no fraud in the election, and we know that did not happen. The negative side is that the GBI investigation will be more thorough, and therefore likely take longer, so will we not have immediate results.

Thanks,

Josh

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**From:** Joshua Findlay <[jfindlay@donaldtrump.com](mailto:jfindlay@donaldtrump.com)>  
**Sent:** Friday, December 4, 2020 10:14 PM  
**To:** Matthew Morgan <[mmorgan@donaldtrump.com](mailto:mmorgan@donaldtrump.com)>; Justin Clark

<jclark@donaldtrump.com>

**Cc:** Bill Stepien <BStepien@donaldtrump.com>

**Subject:** Re: Georgia Update

Hi All,

Here is the Georgia Update:

-Today Ray Smith filed an election contest on behalf of the campaign and the GAGOP. Below is a drobox with all of the documents that we have related to the lawsuit. This is the final draft of the partial lawsuit I attached yesterday, and this includes the exhibits. The SOS recertified the election results today, starting the five day contest period. However, this does not matter unless another group plans on filing an additional contest on behalf of the campaign.

<https://www.dropbox.com/sh/clw2uahb4wngvrw/AABVxMi-90e1nk3Z-OvDidAFa?dl=0>

-In the Sidney Powell lawsuit, the 11th Circuit denied Powell's appeal for lack of jurisdiction, and will allow the case to go forward in the District Court. At the District Court level, the judge has already granted a TRO forcing three counties to preserve the data on the voting machines. Today the Governor and the SOS filed documents with the court alleging that forcing the counties to preserve the machines will hinder the US Senate runoff because they will not be able to prepare the machines for that race. The counter is that the machines do not need to be preserved because the data is stored remotely on a server.

-The feedback from Mike Pence's events in Georgia today was largely positive. It seems like the right message in Georgia right now is that there was fraud and abuse in the election, that we need to keep fighting for proof, and that regardless, everyone needs to vote in the Senate elections. People are interested to hear the President tomorrow, especially whether he will encourage people to vote in the Senate races.

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>

**Sent:** Thursday, December 3, 2020 11:48 PM

**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>

**Cc:** Bill Stepien <BStepien@donaldtrump.com>

**Subject:** Re: Georgia Update

Hi All,

-The SOS published the recount results tonight, and the campaign made up a few thousand more votes. According to the numbers published on the SOS website, the gap between Boden and Trump is now 10,422. It does not seem like the votes were made up in a large chunk in any one area, but rather by the hundreds in counties across the state. The new election results can be found at the link below.

<https://results.enr.clarityelections.com/GA/107231/web.264614/#/summary>

-I finally have at least a partial draft of the election contest petition that Clela Mitchell and Ray Smith are planning to file tomorrow. What I have is attached. The highlights are that the following numbers of ballots should be rejected for various reason. However, we do not have any of the exhibits, so we still do not have access to the evidence.

38,250-45,626 signature match issues  
66,247 underage voters  
2,560 felons  
2,423 no identity  
4,926 non-residents  
15,700 on National Change of Address list  
1,043 registered at a PO Box  
8,718 deceased voters  
2,664 ballots mailed early by the county

-Today the Georgia State Senate held hearings on the election. The morning hearing was with the SOS staff, and the afternoon hearing was with Rudy Giuliani, Ray Smith, and various witnesses. I think the biggest takeaway for most people was that there is probably credible evidence of abuse and possibly fraud on a small scale. I don't think there can be much doubt that this was a sloppy election with little oversight, and certain counties that badly abused the process. However, there is still no evidence of massive vote switching by the Dominion System. The closest any expert got was saying that it could happen. The event did avoid much of the theatrics of the press conference

yesterday though.

-Sidney Powell's lawsuit is scheduled for a hearing tomorrow. We do not know many more details than that. We heard a lot from Powell at the press conference yesterday, but it did not provide much insight into what evidence she would present tomorrow.

Thanks,

Josh

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**From:** Joshua Findlay <[jfindlay@donaldtrump.com](mailto:jfindlay@donaldtrump.com)>  
**Sent:** Thursday, December 3, 2020 9:55 AM  
**To:** Matthew Morgan <[mmorgan@donaldtrump.com](mailto:mmorgan@donaldtrump.com)>; Justin Clark <[jclark@donaldtrump.com](mailto:jclark@donaldtrump.com)>  
**Cc:** Bill Stepien <[BStepien@donaldtrump.com](mailto:BStepien@donaldtrump.com)>  
**Subject:** Re: Georgia Update

Hi All,

Here is a link to the livestream of the Senate hearings today.

<https://livestream.com/accounts/26021522/events/8730585>

Thanks,

Josh

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**From:** Joshua Findlay <[jfindlay@donaldtrump.com](mailto:jfindlay@donaldtrump.com)>  
**Sent:** Thursday, December 3, 2020 12:50 AM  
**To:** Matthew Morgan <[mmorgan@donaldtrump.com](mailto:mmorgan@donaldtrump.com)>; Justin Clark <[jclark@donaldtrump.com](mailto:jclark@donaldtrump.com)>  
**Cc:** Bill Stepien <[BStepien@donaldtrump.com](mailto:BStepien@donaldtrump.com)>  
**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-The recount was going well with no incidents reported until about 10:00 p.m. tonight when the campaign received word that Fulton County was recounting about 12,000 ballots. Fulton initially stopped counting at about 5:00 p.m. and all the campaign's monitors left the building. However, one of the monitors received word that the numbers did not match, and the county would redo several batches. At 11:40 p.m. tonight, the count was supposedly complete again, but the County Superintendent of Elections did not publicly report any numbers. Our lead monitor on the ground told us that the count may be off by 2,800 votes, but we do not know if that is true and if so, how that will affect each candidate. We are still working on tracking down more specifics here. The recount was scheduled to be completed by all counties at midnight.

-Lin Wood and Sidney Powell held a press conference in Atlanta today, and it was very fiery. Probably the most important part was when Lin Wood told supporters multiple times not to vote for the US Senate candidates because the elections are rigged. He also said not to vote for them or the Governor unless he calls a special session of the legislature and have them change the outcome of the election. Wood's remarks were very forceful, and while they will energize the extreme right, they may be harmful among most of the Republican Party. If Republicans lose either Senate seat, many could blame Wood, and by extension Trump, for suppressing the Republican vote. Wood also asked people to donate to his legal defense fund, among other controversial things. I heard that the President called Wood and Powell to discuss the press conference, but I don't know what effect it will have.

-The Georgia State Senate Government Oversight Committee is still planning on holding two hearings tomorrow at 10:00 a.m. and 1:00 p.m. As far as I know, Rudy Giuliani is still planning on attending. Many are waiting anxiously to see how the hearings go, as they could be helpful, and they could be much like the press conference today. The State Senators on the committee reached out to see if the campaign wanted them to ask any questions, but I think we may want to stay as far away from this as possible. There is a good chance this ends up being a spectacle, and no good will come from our involvement. However, if anyone has any feedback, please let me know and I am sure they will be accommodating.

-I have heard that Clea Mitchell and Ray Smith's team are finalizing their lawsuit, and they may file tomorrow. Robert Sinners let me know that they reached out to him today about getting together to sign a verification, but as of tonight, he still had not seen the lawsuit. Ray Smith was at the rally today, so they may have been otherwise occupied.

Hopefully we will get a more solid update tomorrow.

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>  
**Sent:** Tuesday, December 1, 2020 11:09 PM  
**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>  
**Cc:** Bill Stepien <BStepien@donaldtrump.com>  
**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-The recount has now started, or is already completed, in all 159 counties. We had coverage in all but a few counties today, and there were no major incidents to report involving the recount. The recount must be completed before midnight tomorrow night in all 159 counties, and everyone expects this to happen.

-Regarding the timeline to contest the election, we reached out to local counsel Bryan Tyson about how to interpret the vague statute. He replied that the campaign should be prepared to file a contest within five days following the certification of the recount. For example, if the recount ends tomorrow at midnight and the SOS announces certification on Thursday, then the first day in the five-day contest period would be Friday. With that counting, a contest will likely have to be filed by close of business on Tuesday or Wednesday of next week, depending on when the SOS certifies. There are still questions about how the SOS will certify the results of the recount, considering the audit.

-The big issue tonight was a press conference in which a member of the SOS' staff accused President Trump and the US Senators of "inciting acts of violence." Apparently, a tech for Dominion Voting Systems was doxxed and received threats on social media. The campaign and both Senators have already made public comments on the issue, condemning any acts of violence. On the ground, the reaction to the press conference



was one of concern for anyone being threatened, but frustration with the SOS. There are many reports of threats of violence and intimidation against Republican election workers and poll watchers, and the SOS' office has never shown any concern. To many it feels like this is another act of political theater by the SOS designed to hurt the President.

<https://www.wsbtv.com/news/politics/secretary-states-office-says-online-posts-are-putting-lives-jeopardy/AZNAEOSVIRAJVPLKEBREMIIIE54/>

<https://www.cnn.com/2020/12/01/politics/georgia-election-official-trump-republicans-violence/index.html>

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>  
**Sent:** Monday, November 30, 2020 11:45 PM  
**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>  
**Cc:** Bill Stepien <BStepien@donaldtrump.com>  
**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update. Apologies for the length, but there is also some analysis here on the laws regarding an election contest.

### **Recount**

-70 new counties started the recount today, putting 158 of 159 counties in the process or already completed. One small county will begin the recount tomorrow. The campaign had coverage in all but three of the counties today, and there are now 40 counties that have completed the recount. There were no major incidents reported today. The recount must be completed before midnight on Wednesday, December 2.

### **State Legislature**

-I spoke with State Senator Burt Jones today and the Senate Government Oversight Committee will hold hearings on Thursday regarding the signature match issue. There will be a hearing at 10:00 a.m. to go over affidavits that the committee has received, and then the committee has invited Rudy Giuliani to speak to the committee at a separate hearing at 1:00 p.m. Attorney Ray Smith is expected to speak at one of the hearings as well. The purpose of the hearings is to create a record of issues with the election in the hopes that the Governor will call a special session, allowing the legislature to pass a bill rectifying the consent order on the signature match issue. There is a chance this could be helpful to the President, although it is still unlikely that the legislature could or would do anything to overturn the general election results. This would certainly be helpful in the U.S. Senate runoff. However, Senator Jones wanted the campaign to know that there is a group of legislators will do whatever it can to make this productive for the President.

### **Litigation**

-Senator Jones also told me that he and a group of legislators are going to sue the SOS on Thursday regarding the signature match issue. The lawsuit will allege that the SOS did not have authority to enter into the signature match consent order because the legislature sets election rules. The lawsuit is still in a very rough draft form, as the Senator told me his personal attorney is working on it and he is looking for someone more experience in election law to file the suit.

-In the Sidney Powell lawsuit, the judge ordered Cobb, Gwinnett, and Cherokee counties to preserve thier voting machines. This is only three of 159 counties, so it may not make a difference in the election, but it is something. This case is set to have a hearing on Friday.

-There are no new updates on the potential Ray Smith/Cleta Mitchell contest.

### **Secretary of State**

-Today the SOS announced that his office is investigating over 250 cases of voting irregularity in the November election. The investigations involve groups that may have been trying to register ineligible voters, along with individual cases of irregular voting. However, it is unclear how sincere these investigations are, as the SOS's office has already stated that the investigations are unlikely to change the outcome of the race.

-The SOS also continued to dig at the President in public comments. Regarding the recount and election investigations, he stated that "There are those who are exploiting

the emotions of many Trump supporters with fantastic claims, half-truths, misinformation, and frankly, they're misleading the president as well, apparently."

### **Election Contest**

-The SOS has ordered that the recount be completed by 11:59 p.m. on Wednesday, December 2. After the completion of the recount, the campaign has five days to file a contest following "the consolidation and certification of the election results." However, the statute is vague in relation to the audit and the recount. Normally the SOS would certify the election, and then recertify the election following a recount if the results varied. However, in this case the SOS already certified the results following the audit, which means that the SOS did not certify the election day results, but rather the audit results. Because it is unlikely the recount results will vary from the audit results, it is unclear whether the SOS will need to recertify the election results, thereby starting the five-day contest period. Practically, it is likely the SOS will make some sort of statement on certification and consolidation that will trigger the contest period. Once the contest period has begun, the campaign has five days to file. The law is unclear at exactly what time the period ends on the fifth day.

[https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=6a11fece-0d61-499a-8bd6-942450077590&nodeid=AAVAADAAPAAH&nodepath=%2FROOT%2FAAV%2FAAVAAD%2FAAVAADAAP%2FAAVAADAAPA AH&level=4&haschildren=&populated=false&title=%C2%A7+21-2-524.+Filing+and+allegations+of+petition+to+contest+primary+or+election%3B+service+of+petition%3B+verification%3B+notice+of+proceedings+to+answer+petition%3B+service+of+special+process%3B+amendment&config=00JAA1MDBIYzczZi1IYjFILTQxMTgtYWE3OS02YTgyOGM2NWJIMDYKAFBvZENhdGFsb2feed0oM9qoQOMCSJFX5gkd&pddocfullpath=%2Fshare d%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A617D-MHC1-K054-G0V3-00008-00&ecomp=c38\\_kkk&prid=2946689e-662d-4cea-8b8b-9595daad24ef](https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=6a11fece-0d61-499a-8bd6-942450077590&nodeid=AAVAADAAPAAH&nodepath=%2FROOT%2FAAV%2FAAVAAD%2FAAVAADAAP%2FAAVAADAAPA AH&level=4&haschildren=&populated=false&title=%C2%A7+21-2-524.+Filing+and+allegations+of+petition+to+contest+primary+or+election%3B+service+of+petition%3B+verification%3B+notice+of+proceedings+to+answer+petition%3B+service+of+special+process%3B+amendment&config=00JAA1MDBIYzczZi1IYjFILTQxMTgtYWE3OS02YTgyOGM2NWJIMDYKAFBvZENhdGFsb2feed0oM9qoQOMCSJFX5gkd&pddocfullpath=%2Fshare d%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A617D-MHC1-K054-G0V3-00008-00&ecomp=c38_kkk&prid=2946689e-662d-4cea-8b8b-9595daad24ef)

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>  
**Sent:** Sunday, November 29, 2020 10:27 PM  
**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>

**Cc:** Bill Stepien <BStepien@donaldtrump.com>

**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-The recount continued today in a number of counties, most notably Fulton County. Fulton was notable because the county had to pause the recount for a few hours in the afternoon. It was reported that the delay was caused because of issues with the dominion software and some of the activists got worked up about this, but it turns out that our people on the ground told us that the county was switching the calibration on the machines to read Election Day ballots, as opposed to early vote ballots. There were some issues with the switch, but the county was correct to do this technically, since wrong calibration in machines caused problems with miscounted votes in the initial count, which were discovered in the audit.

-In Sidney Powell's lawsuit, the judge set a schedule, highlighted by a hearing on the plaintiff's motion scheduled for Friday at 10:00 a.m. Additionally in the order, the judge ordered the preservation of the state's voting machines. Following that order, the GAGOP Chairman tweeted about the legal victory, but then the judge later rescinded the order because the lawsuit was filed against the incorrect parties. In Georgia, the counties operate the voting machines, not the Governor, SOS, and State BOE, who are the parties to the lawsuit.

-Politics in the state seem to be heating up. A group of Republican protestors gathered outside of the SOS's house following his most recent comment on the President losing the election. The GAGOP Chairman was apparently on the phone with the President for about 30 minutes today, and he seems to be taking action based on what will keep him in the news and give him access to the President. Some of the elected officials are starting to acknowledge embarrassment by the sloppiness of the lawsuit and lack of evidence, but none are ready to speak publicly about it.

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>  
**Sent:** Saturday, November 28, 2020 10:46 PM  
**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>  
**Cc:** Bill Stepien <BStepien@donaldtrump.com>  
**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-Five new small counties started counting today, so there are now 83 total counties participating in the recount. Most notably, Fulton and DeKalb restarted their recounts today. No new counties are expected to begin tomorrow, and all of the counties that have not yet started counting are expected to begin on Monday. Two of the other four largest counties, Gwinnett and Cobb, will also resume on Monday. The campaign was staffed in all but three of the counties today, and there were no incidents to report. The machine recount is not producing any variation from the audit at this point.

-Today the Atlanta Journal-Constitution published an article in which the Secretary of State said that President Trump "should leave quietly" following the certification of the election results. This comment was not really surprising, but it is another antagonistic remark from the SOS toward the President. It has added more fuel to the fire for Republicans on the ground thinking that the audit and recount are a sham.

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>  
**Sent:** Friday, November 27, 2020 9:35 PM  
**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>  
**Cc:** Bill Stepien <BStepien@donaldtrump.com>  
**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia Update:

-One additional county started the recount today, so there are 78 total counties in the recount process right now. However, most of those counties took off for Thanksgiving, so there were actually very few counties working today. Five additional counties will begin tomorrow, but most of the action will begin again on Monday. We had coverage in all but three small counties today. There were no major incidents reported today in the War Room and overall, everything seemed quiet.

-The big news for the last two days has been Sidney Powell's lawsuit, but even that reaction has not been tremendous. There was a little humorous reaction to the first wave of news regarding the typos, and then the reaction to the sitting Republican Governor being named as a defendant was bigger, but has already seemed to pass. Overall, credible people are hopeful about the suit, but not optimistic. People that want to look for a conspiracy like the idea of the suit, but believe there are problems with evidence. There is a lot of doubt on the ground that anything will come of it.

-One thing that has people somewhat confused is whether this is the campaign's official contest to the election. Powell cites the contest statute in her lawsuit, but the campaign is not a party to the suit, and nothing precludes individual voters from challenging election results. However, if the campaign is going to file its own contest after the recount, it will be important to distinguish the lawsuits clearly for the public.

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>  
**Sent:** Wednesday, November 25, 2020 10:01 PM  
**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>  
**Cc:** Bill Stepien <BStepien@donaldtrump.com>  
**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-The recount continued today without any major issues. There are now 77 counties doing the recount, and we were fully staffed in 75 of the 77. No counties will be working tomorrow, and one new county will start on Friday. Five new counties will start counting on Friday, but most counties will resume on Monday. There is some concern on the ground about leaving the ballots mid-recount for four days, but without specific concerns about something happening, there is not a lot we can do prevent that.

-It seems right now like Cleta Mitchell's lawyers will file something on Monday. I spoke with Robert Sinners today and he did not have many details on the suit in addition to what I wrote about yesterday, but he did say that it would not likely be filed until next week. It also sounds like the lawsuit they are filing is to contest the election. If this is the case, the law spells out the timing for an election contest, so the lawsuit may end up being filed later, once the recount is complete. We do not have a lot of details on the ground, although Robert has been looped in to some extent.

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>  
**Sent:** Tuesday, November 24, 2020 10:45 PM  
**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>  
**Cc:** Bill Stepien <BStepien@donaldtrump.com>  
**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-The recount started in Georgia today. 63 counties started the recount today, and two small counties finished. The War Room was fully operational today and we had coverage in all but three of the counties, and no major issues were reported. The biggest issue was that the counties have to start the recount by calibrating the machines, and a few counties had trouble with calibration or cleaning machines, so they could not begin. However, this should not be a problem, as many counties are not going to start

the recount until next Monday anyway. 14 additional counties will start tomorrow, and the campaign will be fully staffed in all these counties.

-It sounds like Ray Smith is preparing a lawsuit, but it has not been decided whether it will be filed tomorrow, after Thanksgiving, or after the recount as a contest. From what I understand, there are two main parts to the suit. The first has to do with ineligible voters. Ray Smith says he has a list of about 30,000 voters that are on the roles but should not be because they have moved, have passed away, have voted someplace else, etc. Of those 30,000, there are estimated to be about 7,000 that may have voted improperly in this election. Ray allegedly has some proof of these improper votes, sufficient to potentially change the outcome of the election.

The second prong of the lawsuit involved signature match. It sounds like Smith has 3-4 county workers that have signed affidavits stating that they were instructed not to examine signatures when ballots came in. In these counties, the workers will also allege that no ballots were excluded for signature match reasons. It also sounds like Smith is trying to get the number of counties that did not do signature match to double digits. If there is a delay in the suit, it will likely be because Ray is trying to find more county workers that will make statements.

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>  
**Sent:** Monday, November 23, 2020 11:36 PM  
**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>  
**Cc:** Bill Stepien <BStepien@donaldtrump.com>  
**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-The SOS announced today that the recount can begin tomorrow in all of Georgia's counties. The recount must be completed by Wednesday, December 2. Because the campaign has not yet requested anything extra, the recount will be a machine tabulation,



which is not likely to change the results much. Under state law, each party is allowed two observers and each campaign is allowed one observer, so we will have three observers total in each county. Right now we are fully staffed in 153 of 159 counties, and Billy assured me that Doug Collins is aware of this number. We will also continue to have a fully functioning War Room in Georgia for the duration of the recount.

-The SOS was supposed to publish exactly when all of the counties will begin the recount, but he has not done so yet. Our volunteers are tracking down that information tonight, and we already know that some major counties such as Fulton, Dekalb, and Clayton will not begin until Wednesday. It is likely that many small counties will finish quickly to be done before Thanksgiving, while the larger counties will start before the holiday and end the next week. The potential break in counting has people on the ground worried about the integrity of the recount, based on recent actions.

-It sounds like Ray Smith and Clela Mitchell are planning on filing some type of lawsuit on Wednesday to expand the scope of the recount. We do not know exactly what they will ask for, but it will include some way to verify signatures at minimum. Based on what I know right now, the group is still deciding what else they may want to include in the petition.

-Overall our volunteers in Georgia are starting to get tired, but Republican generally are still convinced the election was stolen. The field team held a call with volunteers and county chairs today to go over training for the recount. This is the third count in twenty days, and the volunteers were complaining for the first time. At the same time, it sounds like the Members of Congress are getting worried about the lack of information. Billy may ask Doug Collins to give them an update in the next day or so, just to provide additional information. I think it is probably a fine idea of Collins wants to take the lead on this, unless anyone else objects.

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>  
**Sent:** Sunday, November 22, 2020 11:08 PM  
**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>  
**Cc:** Bill Stepien <BStepien@donaldtrump.com>

**Subject:** Re: Georgia Update

Hi All,

Here is the most recent Georgia update:

-The request for the recount has been sent to the SOS, so the ballots will be tabulated again through the machines. No one that I have spoken to knows about specific plans to go to court on the signature match issue. Ray Smith, the attorney working with Cleta Mitchell and Mark Meadows that filed the request for the recount, specifically does not have plans to file anything tomorrow at this point. However, everyone expects a filing to happen soon, and as a result, the GAGOP and both U.S. Senators put out statements supporting Governor Kemp's call for an audit of the signatures. I would not be surprised if something gets filed tomorrow or Tuesday.

-We do not yet know the parameters of the recount, but the AJC reported that it is likely to begin this week. Given what the SOS did for the audit, it seems possible that he will begin the recount ASAP. However, all of the counties just completed a hand recount and the workers are tired and frustrated. Therefore, it is possible that he will wait until after Thanksgiving to do the recount. Either way, the campaign already has people recruited to monitor the recount in 147 of 159 counties, no matter when the recount begins. No one requesting the recount has reached out to anyone on the field team about staffing for the recount though. If the recount will require extra bodies to review signatures, whoever is filing the recount will need to let the field team know, so they can recruit extra volunteers.

Thanks,

Josh

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**From:** Joshua Findlay <jfindlay@donaldtrump.com>  
**Sent:** Saturday, November 21, 2020 11:50 PM  
**To:** Matthew Morgan <mmorgan@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>  
**Cc:** Bill Stepien <BStepien@donaldtrump.com>  
**Subject:** Re: Georgia Update

They did file something late tonight, and it looks like they did not loop in Doug Collins,

Stefan, or Billy before doing so. They also did not use Bryan Tryson at Taylor English. At this point I believe Ray Smtih prepared a letter to the SOS asking for the hand recount. Ray was retained at Mark Meadows' request. From everything I can tell, Meadows was on a call with Cleta today when the decision was made to file. It is unclear at this point whether Rudy, or a member of his team, was also on the call. In addition to the letter asking for the recount, we have reason to believe that someone will also file a legal action at the beginning of next week regarding signature matching. I have not spoken with anyone yet that has seen that paperwork. Needless to say, this is a fluid situation and there is still a lot of information to gather.

Thanks,

Josh

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**From:** Matthew Morgan <mmorgan@donaldtrump.com>  
**Sent:** Saturday, November 21, 2020 10:30 PM  
**To:** Joshua Findlay <jfindlay@donaldtrump.com>; Justin Clark <jclark@donaldtrump.com>  
**Cc:** Bill Stepien <BStepien@donaldtrump.com>  
**Subject:** Re: Georgia Update

Josh,

Let's connect in the morning. I think Rudy's team did file something today. Looks like another right hand / left hand situation.

Let's discuss in morning.

Matt

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