

Fulton County 2024 Election Observation Mission

Final Report

Introduction

In August 2024, the Fulton County Board of Registration and Elections engaged a team of independent monitors to observe the Nov. 5 general election. The Monitoring Team consisted of former election officials, a former Republican Party statewide poll watcher, the former general counsel to the Secretary of State's Office, and a person with broad experience observing both international elections and Fulton County elections. This team partnered with The Carter Center, which is respected worldwide for its experience observing elections. The purpose of the monitoring was to ensure that Fulton County followed applicable laws, regulations, and procedures in the administration of the 2024 general election; to provide timely, accurate, and impartial statements and reports; and to offer appropriate recommendations, if necessary, that could help improve the election process in the county.

This joint monitoring effort, known as the Fulton County Election Observation Mission, built on previous election monitoring projects in Fulton County, including observations of the 2020 election by Seven Hills Strategies¹ and the 2022 election by the Georgia State Election Board's Performance Review Board² and The Carter Center.³ The observation effort was designed to be impartial, transparent, and process-oriented and was independent of poll-watching efforts conducted by political parties. Observation took place during all stages of the election process from September through November, including at central level and more than 700 visits by observer teams to early voting and Election Day polling sites.

Summary Observations

Throughout the election, the staff of the Fulton County Department of Registration and Elections (FCDRE) provided the access, information, and answers needed to conduct a thorough, credible observation effort. ***The overall conclusion was that Fulton County conducted an organized and orderly election process that enabled voters to cast their votes securely and conveniently and ensured that votes were tabulated accurately.***

The implementation of the 2024 general election in Fulton County showed substantial improvement when compared with the 2020 election. Both FCDRE staff and the members of the Fulton County Board of Registrations and Elections were dedicated and hardworking, which was a

¹ Seven Hills Strategies, "State Election Board Report – Post-Election Executive Summary," Jan. 12, 2021, www.7HillsStrategies.com

² "Performance Review Board Report on Fulton County Elections," Jan. 13, 2023. <https://sos.ga.gov/sites/default/files/forms/Performance%20Review%20Board%20Report%20on%20Fulton%20County%20Elections%20%281-13-23%29%20%28OLD%29.pdf>

³ The Carter Center, 2022 General Election Observation: Fulton County, Georgia, December 2022. https://www.cartercenter.org/resources/pdfs/peace/democracy/us_elections/fulton-county-election-observation-report.pdf

major factor in administering a smooth, secure, and accurate election. The centralization of election operations at the new Fulton County Elections Hub and Operations Center contributed significantly as well.

However, no election is perfect. Administering elections – especially in large, diverse jurisdictions like Fulton County – is a complex process, so this report includes recommendations to further improve compliance with the letter and spirit of the law in future elections. Good election administration includes processes that allow issues or errors to be spotted early and action taken to contain and correct them in a transparent manner.

Key Takeaways

The observation team monitored nearly every process, procedure, checklist, and protocol involved in administering the 2024 general election. The FCDRE offered full access to all requested processes,⁴ to requested documents, and to department leadership for any questions. At no point did the observation team witness malfeasance, election manipulation, or efforts to do anything other than ensure a smooth voting experience for Fulton County voters while following all applicable laws and regulations.

Fulton County's preparation for the 2024 general election revealed a new culture of orderly consistency. Headquarters staff at all levels – from temporary staff to managers – and across multiple divisions (registration, information systems, etc.) provided consistent answers to our team's questions, which indicates a dramatically improved training process and clear explanation of the role that each team plays in administering elections. Fulton County clearly has learned from feedback after the 2020 and 2022 general elections and has made significant efforts to improve.

Among the observation mission's key findings:

- **The new Elections Hub was a key improvement in this cycle, bolstering both the transparency and security of the system.** Developing this facility was a prudent move by county leaders, who realized that the previous multiple locations were inadequate for a county of Fulton's size to implement elections without considerable difficulty. In 2020, the Fulton County elections team was spread among multiple locations – the warehouse at English Street, the government headquarters at Pryor Street, the Georgia World Congress Center, and State Farm Arena – depending on the duties being performed. Much of the reason for these additional locations was due to COVID-19 protocols.

Thanks to the new Elections Hub, all activities (with the exception of training that takes place in various locations around the county) occur under the same roof, which improves both managerial oversight and public access to monitor election processes in a single, secure environment. Furthermore, having adequate space allows for simplified, linear processes to occur (particularly regarding processing absentee ballot requests and

⁴ While there were times when observation team members initially were not allowed access by staff, those situations were remedied quickly by FCDRE leadership.

tabulating absentee-by-mail and UOCAVA ballots⁵), streamlining the overall system and minimizing the likelihood of process failures.

The Elections Hub represented a major investment by the Fulton County Board of Commissioners. It allows for more space for training, storage, preparation, testing of election equipment, and tabulating results in a manner that provides room for public observation. The establishment of the Elections Hub decreases the risks of miscommunication that existed when staff had to conduct these functions in separate locations. The hub could be a model for other large jurisdictions seeking to administer smooth, accurate, and secure elections.

- **Voting processes generally were well conducted at early voting sites and at polling precincts on Election Day.** The process was well designed to ensure that all voters were eligible, that the process was accessible and understandable (including for voters with disabilities or limited mobility), and that voting operations were conducted transparently. Some locations did experience challenges with poll-watcher and observer access, due to the size and layout of the premises. As in 2022, the setup of voting machines in some locations created challenges for ensuring the secrecy of the vote.
- **Fulton County election staff and poll managers should be commended for their dedicated administration of the election despite the tense political climate.** On election night, Fulton County Police Chief Wade Yates announced that the county had been subjected to 32 separate bomb threats, with a few voting sites closing for short periods. Election workers persevered to perform their duties, undeterred by these attempts at intimidation. Although polling hours were extended by judicial decisions for polling stations affected by closures, observers at one impacted location observed a small number of voters leaving without voting when the location was closed temporarily due to a bomb threat.
- **The absentee-by-mail system was improved significantly compared with prior elections, both in terms of ballot security and process simplicity.** Throughout the process, the observation team witnessed a commitment to ensuring that data entry was completed accurately and in accordance with Georgia Code. Additionally, there was a clear focus on using chain-of-custody forms to add a level of transparency and security to the absentee-by-mail process from receiving ballot applications all the way through final tabulation. While there were bipartisan concerns expressed with U.S. Postal Service delivery times in Georgia,⁶ the parts of the absentee-by-mail process in FCDRE's control were performed well.

⁵ The term "UOCAVA ballots" refers to ballots cast by voters covered by the federal Uniformed and Overseas Citizens Absentee Voting Act.

⁶ Dunlap, Stanley. "Georgia leaders worry mail delays could cause many absentee ballots to arrive too late to count." *Georgia Recorder*, Sept. 15, 2024, <https://georgiarecorder.com/2024/09/15/georgia-leaders-worry-mail-delays-could-cause-many-absentee-ballots-to-arrive-too-late-to-count/>.

- **The Wireless Data Systems (WDS) inventory management system, which was implemented after the 2020 general election, is a powerful tool for managing logistics and data from a centralized source.** WDS not only provides oversight for the security of equipment and tracking its deployment but also ensures that human errors are minimized during delivery, as each piece of equipment is scanned before being loaded onto trucks so that equipment does not go to the wrong place. In our assessment, WDS was particularly effective in the 2024 election process because Fulton County was committed to utilizing the functionality of the tool. The use of WDS was a major improvement compared with the confusion observed during the deployment of equipment in 2020. Additionally, WDS provides an excellent election security tool, as all security seal tag numbers are recorded and digitized in the system. WDS will flag an error if a piece of equipment is returned with the incorrect seal number, which serves as a protection against tampering with election hardware.
- **Since 2020, the FCDRE has improved the structure of its personnel so that reporting lines and scope of duties are better defined.** The new managerial system and fleshed-out middle management has helped mitigate some of the confusion witnessed during the 2020 election. The new tiered team structure establishes a clear chain of command, with the director empowering managers to manage macro-level processes like registration, absentee voting, and IT systems. Each manager in turn directs Fulton permanent staff members, who then oversee temporary team leads, who directly manage temporary staff. By establishing a clear hierarchy and chain of command, the FCDRE has built a team that seems to function more fluidly and allows leadership to focus on larger-scale issues instead of answering questions from temporary staff needing instruction on minutiae.
- **The observation team observed a consistent training regimen that added built-in redundancies and double-checks.** All FCDRE staff seemed to understand the role they played in the election process. Such clarity and understanding are important aspects in ensuring well-conducted and transparent election processes.
- **The implementation of physical checklists for many election processes (particularly during logic and accuracy testing of voting equipment) ensures that each step of a complex process is done correctly.** This is particularly important when many details are entrusted to temporary staff who have no experience and minimal training. The process of preparing for tabulation of results would have benefited from the use of detailed checklists.

Areas for Improvement

While there are many areas in which the FCDRE has improved, some facets of election administration require further attention. The most top-level are listed below, with further descriptions of the context for each explained in the “Observation Report by Topic” section. The “Recommendations” section at the end of this report provides a detailed list of recommendations.

- **The observation team observed and experienced an uneven application of laws and regulations around access for poll watchers, observers, and the public.** In two cases, this

lack of clarity from the FCDRE led to questions – and hostility – from members of the public who did not understand why certain areas were restricted. This gap in transparency resulted in two flashpoints that ultimately became lawsuits filed against Fulton County.

- During logic and accuracy (L&A) testing, the FCDRE received a complaint that members of the public did not have the “meaningful access” to monitor the proceedings allowed by code. Dozens of ballot marking devices (BMDs) were set out, and members of the public were allowed to stand behind a barricade, which was placed to ensure that machines could not be tampered with outside the view of election workers. O.C.G.A. § 21-2-379.25 and State Election Board Rule 183-1-12-.08 both require that the public be allowed to observe L&A testing. That same law and regulation also make clear that the public cannot interfere with the testing process. The location where members of the public were permitted to stand made viewing the actual testing difficult.

While the FCDRE must balance public access and security, it should explore ways to ensure that public access for L&A testing allows the public to “fairly observe the preparation and testing,” as stated in the SEB rule. The purpose of public observation of L&A testing is so the public can see that the machines are functioning properly before they are put in the field. This purpose should be kept in mind as Fulton adjusts its policies regarding public observation of L&A testing.

- For the weekend of Nov. 2-3, FCDRE staff announced that four county offices would be open to accept in-person delivery of absentee ballots. Initially, FCDRE staff issued guidance that neither partisan poll watcher nor members of the public would be able to observe the return of absentee ballots. While this guidance was revised after backlash, the FCDRE should revisit its policies regarding public observation to ensure they are consistent with the purpose and importance of public observation in elections, while keeping in mind the importance of safety for all staff.

While the behavior of poll watchers and members of the public is not directly controlled by the FCDRE, those individuals – and the political parties that accredit the poll watchers – should keep in mind that aggressive, rude, or disrespectful behavior can be cause for legitimate concern for election officials’ safety and can intimidate voters. Engaging in aggressive, rude, or disrespectful behavior can result in losing the ability to observe election proceedings and decrease the transparency that observation seeks to provide.

- Though it has made clear efforts to improve its communications, messaging, and procedural clarity, the FCDRE should show continued diligence in providing timely messaging regarding its processes and procedures to the public.
 - The distribution of information on the additional hours for ballot drop-off on Nov. 2-3 was poorly communicated. Neighboring jurisdictions announced the hours and locations of absentee ballot return locations as early as July 2024, and those decisions were ratified by the county boards of elections, garnering bipartisan support. A similar

approach could have avoided the frustration, difficulties, and litigation that resulted after Fulton announced the decision.

- Additionally, on Nov. 5, the elections department could have communicated to the group of poll watchers assembled at the Elections Hub that, due to state law setting a deadline to publish preliminary results, they planned to upload only the results file to the election management system (EMS) on election night – and not the ballot images or log files, which significantly add to the upload time. Poll watchers and the public were able to observe this process, but the lack of real-time communication on this issue frustrated the poll watchers of both parties, as it was not an expected process. The process that the FCDRE followed is the state’s recommended best practice for large jurisdictions to ensure that results can be posted in a timely manner as required by law.
- The FCDRE should develop and use checklists for each stage of the election process. The clearest failure in process was on Nov. 5, when the staffer assigned with removing one compact flash card (from the poll worker slot) from each piece of advance voting hardware instead accidentally removed both (including the administrator card). This simple mistake caused confusion among the FCDRE team. In this instance, the error was identified quickly and rectified. But implementing a step-by-step physical checklist during the tabulation of results would ensure that this process is executed correctly moving forward.
- The postelection risk limiting audit process required multiple counts that could have been avoided through improved training and a better method for tracking, dividing, and distributing ballots to audit boards.

Methodology

The observation mission’s Monitoring Team included experts familiar with Georgia elections and election law to monitor the preelection period and election administration as described further in the report. The Monitoring Team focused on observing and analyzing centralized election processes at the county level, primarily at the Elections Hub, but also observed a sample of poll worker trainings and polling sites during advance voting and on Election Day.

The Monitoring Team observed L&A testing, poll worker training, field tech training, warehouse and equipment storage and delivery procedures, processing absentee ballot application, preparing and issuing absentee ballots, receiving and verifying absentee ballots, poll watcher transparency and management, advance voting, Election Day procedures, actual ballot counting on Election Day, canvassing and reconciliation, the City of Atlanta runoff election, and additional activities ancillary to those (such as general chain-of-custody procedures, organizational processes, and communication).

The Carter Center supported the Monitoring Team’s observation of county-level processes but focused primarily on systematic observation of voting during in-person advance voting and on

Election Day, as well as at designated absentee ballots drop-off locations on the weekend prior to Election Day. Both groups observed the conduct of the post-election risk-limiting audit.

The Carter Center conducted nonpartisan election observation to make assessments of early voting and Election Day processes. Nonpartisan election observation is the analysis of systematically collected data to determine the extent to which an election is fair and is conducted according to applicable laws and regulations, as well as the extent to which it respects fundamental standards for democratic elections. Unlike partisan poll watchers, whose objective is to defend the interests of their parties or candidates, nonpartisan observers focus on the overall integrity of the election. They do not interfere in the process but gather the data that is the basis of an overall assessment of the quality of an election. This approach focuses not only on areas that should be improved but also highlights parts of the process that worked well and should be replicated in the future.

The Center's observation methodology has been refined through more than 140 election observation activities in 40 countries. Observers were deployed to voting locations in teams of two, jointly reporting the extent to which the procedures were followed by filling in standardized observation questionnaires. Their access to the voting process followed the same rules applied to partisan poll watchers, except that all observers were accredited by the Fulton County Elections Department.

The analysis in this report is based on direct observation of election activities, analysis of material provided by Fulton County, and meetings with FCDRE administration and staff beginning in September 2024.

Observer Recruitment and Training

The observation of elections in Fulton County was conducted by electoral experts from the Monitoring Team, together with Carter Center staff, electoral experts, and volunteers. Carter Center observers were recruited through several channels, including from staff, volunteers, and interns; the Center's Board of Councilors (composed of community and business leaders of the Atlanta area); the Georgia Democracy Resilience Network (a cross-partisan network of community leaders in the state); as well as faculty and students from Emory University, Georgia Tech, Georgia State University, and Morehouse College.

All observers were required to: attend training on the technical details of early voting and Election Day voting procedures and on the roles and responsibilities of observers; sign a code of conduct; sign Fulton County's monitor oath; and display official observation credentials provided by the county. All observers were U.S. citizens, in line with legal requirements.

Observation Report by Topic

LOGIC AND ACCURACY TESTING

The observation team visited the Elections Hub on several occasions to observe the L&A testing of BMDs. The team observed established redundancies in Fulton County's L&A processes to ensure that required tasks were completed correctly and in the correct order. Each completed step in a checklist was initiated by a temporary worker, signed by the team lead, and then checked by Fulton permanent staff.

At the beginning of L&A testing, the mission observed training of temporary staff, followed by multiple retraining sessions when FCDRE staff noted that some instructions were not being followed. After retraining, Fulton permanent staff confirmed that the temporary workers were following instructions correctly. The IT systems manager implementing the training stressed consistency and uniformity in the process and did not accept deviations from the checklist distributed to the L&A staff.

Each time a new phase of macro-level processes was completed, a new checklist for the next process was affixed to the BMD carrier. This system of physical checklists then was digitized for ease of data retention to ensure that all records were available for later audit. This system included recording the seal numbers – both physically and within the inventory management software – not only for the BMD carriers but also for each piece of equipment sealed within them.

Test Deck Security

The Fulton team used a handheld digital printer to label all 13,000 ballots used during L&A testing with "TEST DECK" and the date and time to ensure that none ended up in the final count. The observation team witnessed the first test ballots being cast and confirmed that staff were following the standard script throughout L&A testing. When mistakes were observed – for example, with the spelling of more difficult candidate names – the county's safeguards ensured that the ballots were corrected.

POLL WORKER TRAINING

Advance Voting Poll Workers

On Sept. 24, 2024, the observation team attended one day of a two-day training session conducted at Johns Creek Environmental Campus designed for new advance voting poll workers. The training focused on the operation of cellular poll pads and ballot scanners/tabulators, both of which are required at each advance voting location in Georgia. Each of the 15 attendees was provided with a workstation including a cellular poll pad and printer. BMDs and ballot scanners also were provided on site for training purposes. In addition to general operating procedures, the training emphasized troubleshooting special circumstances, such as:

- Voter name cannot be found in the database.
- Voter coded as already voting during advance voting or by mail.
- Voter coded as having been mailed an absentee-by-mail ballot, but the ballot has not yet been returned.
- Using an affidavit for canceling an absentee ballot to allow the voter to cast their vote in person.
- Using an affidavit for a voter flagged as serving a felony conviction.
- Voter registered in another precinct or county.
- Voter indicated as being in “challenged” status.
- Voter indicated as not being verified due to missing information on their voter registration application.
- Voters who registered to vote by mail but failed to submit the required identification for verification.

The training also provided a clear delineation between special circumstances that could be solved by the poll worker and those that required the poll manager consultation, such as:

- Voter name cannot be found in the database.
- Challenged voter.
- Nonverified voter.
- Citizenship issue.

The training provided details on election administration-related procedures in general, such as:

- Managing voters in line at the time of the close of polls.
- Customer service.
- Voter assistance and service animals.
- Types of acceptable identification.
- Awareness and mitigation of artificial intelligence (AI) threats to elections.

The training was capped off by role-playing exercises, with some participants playing the role of a poll worker and others playing the role of a voter. Each “voter” was given a sample ID card and a script to use while working through various scenarios with the “poll worker.” During this exercise, trainees also took turns role-playing at the ballot scanner, asking each voter if they had had an opportunity to review their ballot, inserting their ballot into the ballot scanner, and demonstrating to the voter how to observe the ballot count notch up as the ballot was scanned and dropped into the ballot bin.

The hands-on experience with the various processes appeared impactful for the participants and gave them an opportunity to practice handling potentially uncomfortable situations.

Election Day Poll Workers

On Oct. 17, 2024, the observation team attended a four-hour training session at the Elections Hub for Election Day poll workers. As with the training for advance voting poll workers, each of the 15 participants was provided with a workbook that included hands-on exercises. Whereas

the advance voting training centered largely on how poll workers might handle specific situations, training for Election Day workers focused on a broader overview, including:

- Opening and closing procedures, with an emphasis on public observation.
- Acceptable forms of photo ID.
- Line management at closing of the polls.
- Compliance with the Americans with Disabilities Act.
- Service and emotional support animals.

Though the course was only four hours, the two trainers from the Fulton elections team ensured that poll workers understood specific procedural topics, including but not limited to:

- Signage and signage placement.
- Using the proper log form to document all canceled ballots.
- Provisional ballots
 - Provisional ballots cast out of precinct – before and after 5 p.m.
 - Provisional ballot cover sheet used to collect and record provisional balloting/voter information.
 - The completion by the voter of the provisional voter certificate and the beige voter registration application.
 - Emphasis was placed on not touching the voter's ballot.
 - Provisional numbered list of voters. (Workers were trained to write the voter's ID number on the list, making the final adjudication of the provisional ballot much more efficient.)
- Poll pad usage and record-keeping procedures
 - Procedures for retrieving the final count and completing the provisional recap sheet.
 - Hands-on exercises used for various poll pad scenarios.
 - Poll pad security. (Poll pads are kept secure overnight at each polling location and set up on election morning. On election morning, a code is sent to each poll manager to use for opening the poll pad cases.)
 - Poll pad seals were fully explained.
 - Recording voter wait time at 10 a.m., 2 p.m., and 6 p.m. on the poll pad recap sheet.
- Completion of recap documents.

The observation team found that the training was an excellent hands-on, interactive activity that clearly explained the steps to be taken on Election Day and on the Monday before.

Additionally, the training on all recap documents was comprehensive and aligned with the Georgia Code. The observation team particularly appreciated how the Fulton County staff explained how it takes multiple recap forms to document all aspects of in-person voting. Together, the recap documents tell the story of Election Day – how many voters checked in, how many voters used the BMD/printer, and how many ballots were scanned into the ballot box. The documents also collect important information on spoiled ballots, unaccompanied ballots left behind by voters, issued and non-issued provisional ballots, emergency ballots used and unused, and voter wait time.

At the end of the training, an open book test using the Election Day Poll Worker Training Manual was administered. At the conclusion of the training session, attendees were given a poll worker manual for their reference prior to and on Election Day.

Poll Tech Training

The observation team observed training for poll technicians who serve as roving tech support. The course, taught over two days, consisted of a classroom portion as well as a hands-on “lab.” The training module walked techs through intricacies in the Fulton elections digital system in which they can “submit warehouse request,” “report an incident,” request additional equipment, and monitor voter wait times in real time at the Elections Hub.

The overall message stressed throughout the training was, “Be proactive with problem-solving,” because the sooner that issues are caught, the sooner they can be resolved. The newer poll techs were assigned to cover two or three precincts on Election Day. Veteran specialists had six or seven precincts to cover, as they served as an internal redundancy to assist any precinct-specific poll techs. The trainer further detailed how the digital checklist and inventory management system included all the security seal numbers, which would be checked when hardware was returned to the Elections Hub so that it would be clear if someone had tampered with the seals. Spot-checks done throughout the election revealed that this system was indeed implemented and did flag issues as they arose.

ABSENTEE-BY-MAIL BALLOT PROCESS

Throughout the absentee-by-mail process, the FCDRE team maintained clear batch cover sheets (for organizational and counting purposes) and observed proper chain-of-custody protocols. The process for moving ballots from the absentee mail room to the absentee ballot processing area included multiple staff, seals that were checked multiple times, and chain-of-custody forms. Ballots processed were checked into and out of a ballot cage between each step of the tabulation process (opening, verifying, and scanning) before they were ultimately sealed – all methods that worked to ensure the security and integrity of the ballots.

The steps in processing absentee ballot applications, absentee ballot packaging, and handling returned voted ballots appeared to be thorough and involved several levels of proofing and quality assurance measures. Each aspect of the absentee-by-mail process is analyzed below.

Absentee Ballot Application Processing:

The observation team performed multiple examinations of “back office” processes for absentee-by-mail ballots as well as subsequent spot-checks throughout the election cycle. The FCDRE team walked the observation team through each step of the process, as detailed here:

1. First, FCDRE staff looked up the voter applying for the absentee-by-mail ballot and verified that all required information was included. If the application was determined to be incomplete or if verification requirements were not met, employees then attempted to contact the voter via phone, email, and regular mail so the application could be

cured. The observation team found that satisfactory documentation was being used throughout, as the application made its way through verification.

2. Next, one of two paths was followed: If the application could be properly verified, staff entered the data into the voter registration system so that a ballot could be issued to the voter; or if the application could not be verified due to missing or mismatched information, the voter was notified and given the opportunity to cure their application. Either way, applications were marked with the Voter ID numbers to help record retention and double-check if the team needed to cure an application later. The observation team found that a full quality assurance (QA) check of the data entry clerk's entries was performed by a second individual.
3. Third, the application was scanned and attached to the voter's Georgia Registered Voter Information System (GARViS) record. During this process, staff signed their names on the absentee ballot application after completing entry and in a second location on the same form after performing QA so there was a paper trail of who touched the application. These applications were logged out and back into the approval system in a yellow physical logbook for chain of custody.
4. Finally, the approved application was sent to the team packaging the absentee ballots for mailing. The application itself was retained for records. This system operated securely and fluidly. The observation team inspected the application retention record filing cabinet and found that all applications examined had followed this same dual-signature process and were clearly marked and filed in a consistent system in accordance with Georgia law.

Absentee Ballot Issuance

The observation team made multiple visits to the mailroom to examine processes for issuing absentee-by-mail ballots as well as frequent subsequent spot-checks throughout the election cycle. The Fulton team walked the observation team through each step of the process:

1. First, FCDRE staff used the information on each voter's application to ascertain which precinct-specific ballot to send. The observation team found that the new Fulton absentee system operated in such a way that there were no superfluous amounts of unmarked ballots in the warehouse. The absentee voting manager initially ordered only 25 ballots per precinct and ordered a resupply from the vendor when that supply got below 10. This was a significant improvement from the 2020 election.
2. The FCDRE staff compiled a ballot packet for each qualified voter, including a privacy envelope, a return envelope, a blank ballot, voter instructions, and information on withdrawn or disqualified candidates. Once the packet was assembled, a QA team of two employees verified that all required items were in the envelope, that the proper voter's name was on the mailing label, and that the correct ballot was in the envelope. The system for performing QA added a redundant check into the system: Worker A read

the voter's name and address, and Worker B responded with the precinct code while verifying contents. This system allowed election workers to check each other's work for accuracy while completing their own task.

3. Finally, postage was applied and the ballot entered the mail stream.

UOCAVA Ballot Application and Issuance

The ballot applications and actual ballots received according to the Uniformed and Overseas Citizens Absentee Voting Act are a pivotal part of absentee-by-mail voting. The observation team found that all UOCAVA applications and ballots received the same level of attention as applications and ballots received from stateside voters and that the additional guidelines defined by federal law also were followed.

Accepting Returned Absentee Ballots

The observation team visited the absentee mail room on multiple occasions to examine processes for accepting returned absentee-by-mail ballots and conducted frequent subsequent spot-checks throughout the election cycle. Fulton County elections staff walked the observation team through each step of the process:

1. First, returned absentee ballots were supposed to be machine-stamped with the date and time of receipt. While many of the ballots were in fact machine-stamped, the Tritek mail sorter used for this task did not work for much of the process, which meant that staff had to complete the task by hand. Manually completing this process was considerably more time-consuming, but Georgia Code requires stamping the time and date upon ballots once they are received, and Fulton complied with that requirement.
2. Employees verified that each ballot had been date- and time-stamped in accordance with Georgia Code and that all required information was included within the signed Oath of Elector envelope. The staffer then checked that the ballot included the voter's driver's license number or Social Security number. If this identification was correct, the staffer signed off on the verification and entered receipt of the voter's ballot into GARViS to give the voter credit for having voted. The fact that Georgia now uses driver's license-based verification instead of relying on signature matching dramatically accelerated the rate at which ballots could be verified and removed subjectivity from the process.
3. If a voter had received help in casting their ballot, the person assisting the voter was required to have signed the back of the envelope flap. In this case, the information entered onto the envelope flap for the assisted voter was scanned and added to the voter's record in GARViS.
4. Once all information was verified and certified, electronic images were made of the front and back of the envelopes in batches of 100-150 envelopes. The monitoring team

also observed the extensive security checks that were in place to secure returned ballots and found that they were both adequate and followed.

5. If the ballot could not be verified due to missing or mismatched information, the ballot cure processes were implemented by notifying the voter of the deficiency and giving them an opportunity to resolve the issue.
6. Verified and approved absentee ballots were bundled into batches of 50 according to precinct code in preparation for early absentee ballot processing. This step was done not only to ensure that numbered lists of voters were generated accurately, but also to prepare for the risk-limiting audit, which requires that ballots be pulled from a particular precinct. This process would have been very quick if the Tritex machine had worked, but it was done by hand after the machine malfunctioned.
7. Finally, ballots were moved by a team of two in a sealed, locked ballot cage to the absentee ballot scanning section of the warehouse, where it was received by the absentee voting manager, with chain-of-custody forms signed and the seals retained for records. This linear, clear, secure process was enabled both by improvements in management and by the new Elections Hub facility, which allowed each step to occur in a single location.

Provisional Absentee Ballots

Provisional absentee ballots were issued if the voter did not provide correct ID information on the ballot application. Approximately 1,700 of the 41,000 absentee ballots that Fulton County sent out were provisional ballots. The returned provisional absentee ballots were stored separately from regular absentee ballots and then stamped “CURED” after receiving cure materials from voters. Georgia Code states that once provisional absentee ballots are cured, they become regular absentee ballots and are then sorted into their correct precinct batches to prepare for the risk-limiting audit. A separate letter on the process for curing a ballot was sent to each provisional absentee ballot voter to explain how the voter could provide their correct information to election staff.

Scanning Absentee Ballots

The observation team observed the first absentee-by-mail ballots being scanned and continued to watch the scanning of ballots through the UOCAVA receiving deadline. From the beginning of the process, the staff used batch cover sheets as well as chain-of-custody forms and orange or yellow cover sheets to separate ballots that required duplication and adjudication (usually as a result of write-ins).

Maintaining ballot security clearly was a paramount concern during this process, as the batches of ballots were retained in a secure cage adjacent to the processing area whenever they were not in the direct possession of the Fulton County team. After each step in the process (see below), ballot batches were returned to the secure cage to protect chain of custody.

A new Georgia law required that results from all absentee ballots received on or before the day before Election Day (in this case, Nov. 4, 2024) be tabulated and posted no later than 8 p.m. on Election Day (in this case, Nov. 5). Through several days of diligent efforts, the FCDRE was able to report these results by – or very close to – the 8 p.m. reporting deadline mandated in state law. However, processing UOCAVA ballots was slower and continued throughout the days following Nov. 5.

- **Vote Review Panels**

Ballots requiring duplication were routed to vote review panels (VRPs) with proper cover sheets. Each VRP consisted of a bipartisan team of volunteers whose role was to 1) review ballots flagged for the reasons noted by the tabulation system; 2) collaborate to ascertain the intent of the voter; and 3) use a BMD to re-create a faithfully completed, scannable duplicate ballot that was machine-readable for tabulation. While there were occasional instances of damaged ballots that required duplication, the vast majority of ballots sent to the VRPs contained a write-in candidate in one or more races on the ballot, as this is a built-in feature of the Dominion system. Once the duplicate ballot was created by the VRP, the cover sheet, original ballot, and duplicate ballot were all submitted to FCDRE staff for verification and labelling with a unique ballot code.

The observation team received complaints that the bipartisan VRPs – rather than FCDRE staff – should be the last to touch the ballots before scanning. The complaints further stated that the VRPs should be the ones to label the original ballot as “ORIGINAL” and the duplicate ballot as “DUPLICATE” instead of Fulton staff – particularly when dealing with UOCAVA ballots. When the observation team asked the Fulton team how this order of operations was devised, they explained that Fulton permanent staffers are the last to check the ballots to ensure that the duplication was done accurately and that they had found multiple instances of inaccurate duplication by the VRPs. This mistake by the VRPs occurred with sufficient frequency that the FCDRE created the current workflow.

- **Adjudication**

After a batch of duplicated ballots reached the requisite 50 ballots, it was then sent to the scanning team to be processed. However, the election software automatically assigns all ballots with write-in votes to be adjudicated. These duplicated batches were labor-intensive for the staffers operating the equipment. This batch would then be sent over to the VRPs for a final review, during which the adjudicators would use the software to assign votes to the correct write-in candidates (and assign “no votes” if the ballot contained a write-in vote for an unqualified candidate – for example, Mickey Mouse). After votes were assigned, the original ballot, duplicate ballots, and cover sheet were all retained as records by Fulton staff.

- **UOCAVA Ballot Scanning**

As described above, the scanning of UOCAVA ballots followed the same protocol as standard absentee-by-mail ballots but with extra steps added. For UOCAVA ballots, the

external envelope in which the ballot was received (from DHL, UPS, etc.) was retained in accordance with Georgia Code and was stapled to the physical ballot itself, which would be duplicated later by a bipartisan VRP. Additionally, the ballot was marked with a ballot activation code that corresponds to the voter's precinct so that the correct ballot could be pulled by the VRP when duplicating.

The observation team witnessed the acceptance of UOCAVA ballots through the 5 p.m. deadline on Nov. 8 and found all protocols to be in accordance with both Georgia law and established best practices. The observation team received the same complaint regarding the processing of UOCAVA ballots as mentioned above and investigated the allegations by interviewing FCDRE staff. Due to the number of errors caught by the FCDRE staff while reviewing the quality of the VRPs' work, the observation team believes that final QA check is important to the integrity of the process.

Ballot Retention and Security

In accordance with Georgia Code, the FCDRE collected ballots daily from advance voting precincts that had received more than 1,500 ballots on a given day. Poll managers scheduled pickups through FCDRE logistical staff, and pickups usually were completed (by teams of two) while the polls were still open so that there could be more transparency for voters. Chain-of-custody protocols (including ballot bag seal numbers and staff names) were followed throughout this process.

Once the ballots were delivered to the Elections Hub, they were retained in a secure storage cage that required keycard access as well as sign-in/sign-out sheets for anyone entering. Additionally, security cameras recorded the only point of entry and egress. To tour this area, the observation team was required to follow the same security procedures as everyone else, indicating a strict adherence to security protocols.

Inside the cage, the logistics manager set up a system that had advance voting precincts labeled neatly on the floor and a small pyramid of ballot bags behind each label corresponding to the correct precinct. Each pyramid was expanded by nightly deliveries, so having the well-planned system in place ensured that all ballots from this election could be reviewed if called upon for an audit.

This cage was used not only for securing ballots returned from the advance voting precincts, but also for the preparation of packets of absentee/provisional/emergency ballots that were to be distributed on Election Day. The observation team observed staff filling ballot bags with these sealed and precinct-labeled packs of unused ballots as well as double-checking via barcode scanner and WDS that the correct batches were going to the correct precincts.

Equipment Management System

FCDRE's commitment to organized inventory management is not limited to the ballot retention workflow, as there also is a new system for controlling election hardware. The observation team inspected the poll pad cage while the information systems team was uploading the poll

book on all of the poll pads for Election Day. During this inspection, the observation team found that the new system is built to ensure that election materials are secured and retained throughout the election cycle. In preparation for this election, a piece of paper corresponding to each precinct was taped to the floor and organized alphabetically and then numerically while onboarded poll pads were stacked neatly for their respective precincts. This system eliminated the issues witnessed in the lead-up to the 2020 general election, when the process of deploying equipment to precincts was marked by confusion and disorder.

Additionally, the poll pads cage also serves as a long-term repository for poll pads postelection. Poll pads are stored in padlocked rolling cages, with the numbers for the poll pads that should be contained therein. When paired with the WDS, the FCDRE knows exactly which poll pads have not yet been returned, to which precinct they were issued, which poll manager is responsible for their return, and where any unaccounted-for hardware may be.

Absentee Ballot Return on Nov. 2-3

On Saturday, Nov. 2, and Sunday, Nov. 3, the FCDRE team decided to keep four satellite offices open to allow the return of absentee ballots in-person.⁷ Absentee ballots were allowed to be returned over the weekend in other counties as well and the practice was found to be lawful when it was challenged,⁸ but this decision was communicated late in the process (on Nov. 1) and was perceived by some to be a significant change. Furthermore, the FCDRE leadership did not adequately convey a transparent plan for collecting ballots in these locations that allowed for observation of the process. As a result, there was confusion among FCDRE staff and the general public regarding whether or not members of the public and party poll watchers would be allowed in the locations. Ultimately the public was allowed to observe the process but not without some difficulty.

The observation mission deployed observers to all four satellite offices. The observers found that some members of the public who wished to observe the absentee ballot return process at the North Annex in Sandy Springs were not allowed in the building, but this initial reaction by security staff was remedied, and public observers were allowed in. The same circumstances existed at the Elections Hub, where initially public observers, including an observation mission team member, were not allowed in the room where people were returning their ballots. This was remedied as well.

Observers also noted that the tense environment for voters returning ballots included individuals who were video-recording voters, which could have dissuaded some people from returning their ballots. Despite the sometimes tense circumstances regarding public observation during this process, elections staff adhered to proper protocol regarding the return of ballots, including time-stamping the receipt of ballots and securely storing them for

⁷ The four locations were: North Fulton Service Center, Fulton County Government Center on Pryor Street, South Fulton Annex, and the Fulton Elections Hub.

⁸ See *Republican Nat'l Committee et al., v. Mahoney, et al.*, U.S. District Court for the Southern District of Georgia, Case No. 4:24-cv-248, November 5, 2024 (stating that plaintiffs who were arguing that accepting ballots on weekends is unlawful “do not have any likelihood of success on their claims”).

processing. Approximately 105 ballots were returned countywide via this method on Nov. 2, and approximately 200 ballots were returned on Nov. 3.

In the future, the FCDRE could ensure transparency for the public, provide better information for voters, and reduce the risk of intimidating behavior by publicizing all times and locations for absentee ballot return well before the process begins. These dates and times should be approved by the elections board in the same manner that advance voting locations are approved and announced by the board, like some other jurisdictions did.

IN-PERSON VOTING (ADVANCE VOTING AND ELECTION DAY)

Summary of Observer Deployment

Election observation occurred at least once at all 37 regular advance voting locations and at six of the seven outreach sites, with most regular locations being observed at least five times.⁹ The observation mission deployed 71 observers during the advance voting period, usually in teams of two. The mission conducted a total of 459 observations of the advance voting process, including 323 separate observations during voting hours, 78 observations of opening advance voting locations (at 34 locations), and 58 observations of closing advance voting locations (at 32 locations).

On Election Day, the observation mission deployed 84 observers in 42 teams. The teams observed at all 177 Fulton County voting locations and submitted 179 observation reports. This included observation of opening procedures at 32 polling locations and closing procedures at 38 polling locations. Members of the Monitoring Team also observed advance voting locations and polling locations on Election Day.

On election night, the Monitoring Team and Carter Center observers monitored activities at the Fulton County Elections Hub. This included observing the process of election materials being returned to the operations center, the opening of advance voting equipment, the tabulation of advance voting and Election Day results, access of party poll watchers and the public, and communication with the public by election officials.

Data Collection

Carter Center observer teams collected data using standardized paper forms due to the prohibition of phones or electronic tablets in polling locations. The teams entered the data into an electronic form after leaving the polling site and transmitted it to the Carter Center's data team. The data team then analyzed the data from more than 700 forms to produce cumulative data and identify trends. The mission supplemented this data with information provided by the FCDRE. The following sections summarize and synthesize the data collected using these methods.

⁹ The observation mission did not observe at the Atlanta Metro State College outreach location.

Observation of Advance Voting

In-person advance voting was conducted from Oct. 15 to Nov. 1 at 44 polling sites. Seven of these locations were outreach locations at universities, senior centers, and other government buildings that were open for only two days each. In-person advance voting is an increasingly popular method of voting in Georgia. In Fulton County, some 77% of voters in the 2024 general election cast their ballot using advance voting.

The observation mission found that advance voting was orderly and efficient, with only minor incidents. In 98.7% of visits, observer teams positively assessed the conduct of advance voting, and all opening and closing processes observed were assessed positively.

The number of advance voting locations appeared to be sufficient. Overall, voting was spaced evenly throughout the day, with lines observed occasionally, notably at the start of a voting day. In 57% of observations, voters did not experience any wait time. In the remaining 43% of observations, the average wait time for voters was five minutes (the longest was one hour). The environment outside the advance polling locations was calm in all observations. For the most part, advance polling locations were found to be accessible to disabled voters and voters with mobility issues, although observers found wheelchair access in some smaller locations to be difficult. Twelve locations were noted as lacking adequate parking.

Carter Center observer teams reported that advance voting poll workers overall understood procedures and how to use the equipment, indicating that training on these aspects was satisfactory. In one observation, confusion regarding closing procedures was noted after a poll watcher questioned a poll worker on a proposed State Election Board rule that had not been implemented. The issue was resolved after communication from the FCDRE, and proper closing procedures were followed.

Observer teams found that poll workers appropriately assisted voters who did not understand voting procedures. Observer teams also found that poll workers systematically reminded voters to verify their choices on their paper ballots before putting them into the scanner, as required by state regulation.

Ensuring the secrecy of the vote is a fundamental electoral standard, both internationally and in Georgia law, to ensure that voters can make their choices free from coercion. In 21 advance voting locations, observation reports indicated that ballot secrecy was a potential issue. In some instances, BMD hubs were set up so that one or more screens were visible to poll workers, poll watchers, or other voters. In other instances, the small size of some voting locations, in combination with the large size of the BMD screens, made it difficult to ensure voter privacy.

In a few locations, observer teams noted that it was possible to see voter choices on the BMD screen. Some observer teams also reported concerns about ballots being visible to others when they were carried to the scanners or when they were inserted. Elections staff informed the observation mission that privacy filters had been installed on some BMDs. In the few instances

observed where they were in place, the privacy filters appeared to work well, without negatively affecting the usability of the voting equipment.

Access of Observers and Poll Watchers During Advance Voting

The FCDRE was responsive in ensuring observer accreditation and access to voting locations, and polling managers were given up-to-date lists of mission observers. Throughout the advance voting period, poll managers permitted varying levels of access to Carter Center observers. In most places, observers were granted sufficient access to the process. However, in a few locations, access to the room where voting was conducted was restricted. In some locations, managers stated that restrictions were due to the small size of polling locations and to concern for voter privacy. Observer access improved as the voting period moved on but remained an issue in a small number of locations.

Partisan poll watchers were present in 233 advance voting observations. Observer teams found that poll watchers largely were permitted appropriate access by the poll managers. Poll watchers adhered to their role in 97% of those observations. In a few instances, poll watchers were observed leaving a polling location to interact with a voter outside.

Observation of the Election Day Voting Process

Carter Center observer teams assessed the overall conduct of Election Day polling sites positively in 96% of the 177 locations, reporting that the voting process was mostly calm and orderly throughout the day. However, the Election Day process was impacted by numerous bomb threats. The Fulton County police chief reported on election night that 32 sites had received threats, leading to the temporary closure of five locations. Voting hours at these locations were extended to compensate for the closures, but at the temporary closure of one polling location where a Carter Center observer team was present, several voters who had not yet voted left, saying that they were unable to wait for the location to reopen.

The longest lines were seen at the opening of polls. These lines were managed efficiently, and voters did not experience significant delays. The reported short lines and wait times suggest that there were sufficient polling sites available on Election Day.

The vast majority of voters appeared to understand how to operate the BMDs and were able to complete the voting process in less than four minutes. Many voters were observed as needing instructions to use the scanners, but usually they were then able to insert their ballots, as required by law, without difficulty.

Inadequate space within some polling sites posed challenges. In some instances, observers were seated at a distance from voting operations and were unable to follow the process fully. As during the advance voting period, observer teams noted that voting secrecy was an issue. In just over half of the polling locations (90 of 177 locations), one or more BMD screens were visible to poll workers, poll watchers, and/or other voters. Also, as in advance voting, the secrecy of the individual ballot when carried to and entered into the scanner facing up was a

concern, as the content of the ballot was then potentially visible to poll workers staffing the scanner.

Additionally, observer teams reported that some polling locations posed challenges for voters in wheelchairs or with mobility issues. Inadequate parking or lack of accessibility to public transportation also was noted to be an issue for a small number of polling locations.

Although observer teams assessed the conduct of polling operations positively in almost all cases, they gave negative assessments in seven of the 177 locations (4%). The reasons included poll workers who did not appear to be sufficiently trained; scanner malfunctions; poor layout of the polling location; and disorganization. In one polling station, the observer team noted two cases in which female voters appeared to be directed how to vote by their partners, without polling staff intervening.

In addition, communication between poll managers and the Elections Hub appeared to be a significant issue on Election Day. Observer teams reported that poll managers sometimes had to wait on hold for long periods before reaching headquarters for guidance on issues related to voter eligibility. This led to lengthy waits (as much as two hours) for affected voters. The observation mission was informed by Fulton County election staff that they became aware of an issue regarding their call center where callers who selected a certain prompt would be placed on hold without notification to the center that callers were waiting. Once this was discovered, Fulton IT staff resolved the issue. The elections director informed the observation mission that a plan has been developed postelection to better test the helpline to ensure functionality before future elections, and that a procedure has been set up to monitor phone wait times frequently throughout the day on future election days.

Observer teams were largely able to observe without restrictions, but their access was limited to some extent in 10% of polling locations. This was due to the small size of some locations and to a few instances in which poll managers interpreted the rules in an overly restrictive manner.

The closing of the polls was assessed positively in 35 of 37 election-day observations. Poll workers appeared to implement closing procedures smoothly. Two locations were assessed negatively due to disorganized processes, confusion among poll workers regarding procedure and record-keeping, and, in one location, some poll workers leaving before the process was finished. Overall, observer teams described the closings as “professional,” “orderly,” and “transparent,” and praised the election staff in comments for their work and dedication.

TABULATION OF RESULTS

By and large, the Election Day tabulation process was well executed. The FCDRE was able to comply with the 8 p.m. deadline for reporting absentee ballots received by the day before the election (including advance voting). Fulton County also reported 100% of election precincts by 12:03 a.m. Nov. 6, with fewer than 500 absentee-by-mail ballots left to scan when operations closed at 2:19 a.m. Nov. 6.

The logistics of receiving Election Day votes and materials were well planned and well executed, reflecting the significantly improved operational preparations described above. Eight satellite locations were established across the county to serve as collection points for compact flash cards from poll managers, which were then delivered to the Elections Hub under police escort with proper chain-of-custody forms.

Improvements in the tabulation of results process compared with previous elections, notably the 2020 election, include the following:

- **Transparency and clarity in the tabulation process has improved significantly.** By improving access for members of the public and party poll watchers, adding screens that mirror file uploads to EMS, and building the “fishbowl” check-in point to allow viewing from all sides, Fulton County has responded clearly and constructively to feedback regarding public visibility of the process in previous elections. Furthermore, sharing the physical advance voting results tapes on a bulletin board for the public to see was an excellent idea and should be continued for future elections.

Another improvement was providing announcements over the public address system about what was happening on election night, as members of the public could understand exactly what was happening as memory cards made their way into the Elections Hub, through check-in, into the fishbowl, and ultimately to EMS. Thanks to the clear announcements, the observation team was able to monitor the tabulation of all compact flash drives from Election Day, from the first batch arriving at 8:34 p.m. through the last memory card being delivered at 11:37 p.m.

- **The Election Day check-in process is more transparent and efficient.** As it functions now, poll managers bring in memory cards to sign over to a system specialist, who then checks them into the WDS. The specialist then turns memory cards over to the next team, which double-checks the work and then moves the cards over to the fishbowl after filling out paperwork. Observation team monitoring showed that proper chain-of-custody forms were used throughout the process.

Meanwhile, a second FCDRE team collects all Election Day materials: poll pads, provisional ballots, emergency ballots, challenged ballots, as well as standard ballots and the poll manager’s book. Each of these is contained in a color-coded bag (provisional ballots in orange, challenged ballots in red, etc.) so the contents are easily identifiable. This process was streamlined, linear, methodical, and open to the public.

- **The increase in security for personnel, the facility, and the ballots also was positive and thoroughly planned.** By having tight security with ID checks, a palpable police presence, and an overall safe facility with its own alarm system, the FCDRE team was able to implement election procedures largely undisturbed, despite receiving 32 bomb threats throughout Election Day. The observation team commends Fulton County on

their efforts to improve the physical security necessary for implementing the election in a safe environment for both election workers and ballots.

Overall, vote tabulation was smooth and orderly, but there were areas where processes could be improved. For example:

- **The early tabulation of advance in-person and absentee-by-mail votes is crucial to complying with the 8 p.m. reporting deadline.** Fulton was much improved in completing early tabulation, but some areas warrant further improvements.
 - While the vast majority of equipment was returned properly sealed, there were isolated instances of election equipment used during advance voting being returned to the Elections Hub without having been properly sealed by poll managers at the precincts. This also occurred during the City of Atlanta runoff.
 - At 1:52 p.m. on Election Day, FCDRE staff opened the first hardware seals eight minutes earlier than their posted start time of 2 p.m. (and subsequently closed back up ostensibly until 2 p.m.). A simple checklist could have prevented the unnecessary opening of seals. Furthermore, the power cord “pigtailed” could have been connected at any point before 2 p.m. without having to scramble to handle the task. Recovering from this lack of preparedness cost the FCDRE team valuable time needed to meet the mandatory reporting deadline only a few hours later.
 - Early tabulation is allowed by law to begin at 7 a.m. on Election Day. It is a resource-intensive process, and the FCDRE may not have had sufficient personnel to handle both early tabulation and myriad other duties. However, given the 8 p.m. deadline for reporting early votes and absentee-by-mail ballots received by the previous day, starting early tabulation before 2 p.m. on Election Day is recommended if it is possible to get sufficient personnel without compromising other duties.
 - At 6:16 p.m., the Fulton team began pulling compact flash cards from the advance voting equipment for uploading to the election management system. The cards were individually labeled with stickers indicating “Poll Worker” and “Admin” and carried in a clearly marked pouch with proper chain-of-custody procedures. However, when the cards were given to the check-in team, both cards were pulled from each scanner and kept in the same bag. This was risky, as an accidental coffee spill could have caused a serious and costly issue. This risk, along with other process failures, could have been avoided by the universal implementation of clear checklists and communication with staff.

CERTIFICATION AND RECONCILIATION

Returning to the Elections Hub on Nov. 6, the observation team witnessed that staff were working on reconciliation and canvassing even though there was still work to do in terms of processing the last approximately 500 absentee ballots received before the submission

deadline, processing cure documentation for provisional and rejected ballots, accepting and properly duplicating UOCAVA ballots, and ensuring proper file uploads to EMS. The observation team conducted multiple process spot-checks throughout the end of election week and observed that although there seemed to be a more relaxed attitude in the warehouse, staff continued to fulfill their duties with great care and perseverance.

- **Nov. 12, 2024: Certification Day**

While implementing their canvassing processes during reconciliation week, the FCDRE realized that the numbers of counted votes and ballots on hand did not match at several precincts, as detailed in Table 1 below.

Table 1: Discrepancies Discovered in Vote Counts (by Precinct)

Division	Precinct	ICP #	Discrepancy	Manager Statement Status	Manager Confirmed
ED	04L and 04K	1	Missing one ballot	-	-
ED	EP01A	1	Missing one ballot	Received	Double scan
ED	AP12 A/B/C/D	1	Missing one ballot	Received	Double scan
ED	SC02, SC02A, and SC32	1	Missing one ballot	Received	Double scan
ED	SS05 and SS18ABC	1	Missing one ballot	Received	Double scan
AIP	C.T. Martin	2	Missing one ballot	-	-
AIP	East Point	1	Missing two ballots	-	-
AIP	Roswell Library	1	Missing one ballot	Received	Double scan
AIP	N.E. Spruill Oaks	1	Missing one ballot	Received	Double scan

The Fulton canvassing system is built to identify inconsistencies, and it discovered these particular issues in due course. The director explained that staff use the counting function of the tabulation equipment to physically count all ballots twice to ensure that the number of ballots on hand matches the votes shown on the ballot recap sheets. Any discrepancies are investigated. If the Elections Hub staff get the same number twice and those numbers still disagree with the figures in the recap sheet, then all ballots from that precinct are rescanned. Additionally, Elections Hub staff contact the poll manager to help determine what happened. The cause of the discrepancy was usually a paper jam that led to a ballot being scanned twice in the precinct (Hub staff also check the scanners for jammed ballots).

Poll managers usually were able to include a report of the reason for any discrepancy on their poll manager recap sheets.

After conducting their investigation, the FCDRE commenced rescanning batches from problem precincts at approximately 2 p.m. and finished at 4:17 p.m. While the explanation provided by the director makes sense, the optics of having to rescan more than 10,000 ballots just three hours before the mandatory 5 p.m. certification deadline was not ideal.

The final results showed a turnout in Fulton County of 541,633 voters of 757,635 registered voters (71.49%).¹⁰ Data regarding the number of ballots, voters, registered voters, and voter turnout for each part of the voting process in Fulton County is seen in Table 2 below.¹¹

Table 2: Fulton County Election Data (2024 General Election)

Counting Group	# of Ballots	# of Voters	# of Registered Voters	Turnout
Election Day	94,370	94,370		12.46%
Advance Voting	417,323	417,323		55.08%
Absentee by Mail	29,291	29,291		3.87%
Provisional	649	649		0.09%
Total	541,633	541,633	757,635	71.49%

THE RISK-LIMITING AUDIT

As per standard procedure, the FCDRE implemented the mandatory batch review known as a risk-limiting audit (RLA). The RLA is conducted statewide to confirm that the election results are accurate, serving as a check on the accuracy of counting and reporting of results in a statistical manner. Through a randomized process, the Secretary of State's office determined which particular batches of Fulton County ballots would be audited, detailed in Table 3 below.

Table 3: Fulton County Batches Chosen at Random for Risk-Limiting Audit

Batch	Category	Scanner	Quantity
Heritage Hall at Sandy Springs	Advance Voting	ICP 3-0	2,295
Ponce de Leon Library	Advance Voting	ICP 1-0	5,395
Roswell Library	Advance Voting	ICP 3-0	6,180
Trinity Anglican Church	Election Day	ICP 1-0	139
Absentee by Mail	Absentee by Mail	ICC 1-60	48

¹⁰ Election Summary Report, Fulton County, Georgia, Nov. 5, 2024, Official and Complete, <https://www.fultoncountyga.gov/-/media/2024-Election-Documents/Election-Summary-Report--Official--Complete--November-5-2024-V2.pdf>

¹¹ Ibid.

The way in which the FCDRE performed the RLA led not only to repeated counts but also stretched the counting across two days. This is not to say that the FCDRE did not conduct an RLA or that it found the results invalid, but rather that the RLA did not undergo the same procedural overhaul as other phases of the election. Among the specific issues noted:

- Throughout the RLA, it was clear that audit teams were not all using the same counting techniques demonstrated in the training video. While 12 audit teams were doing the correct cross-stacking of groups of 10 ballots (as instructed in the training video), three teams were breaking their counts into batches of 50. One team appeared to be counting the whole pile from top to bottom, which the training video specifically warned against because it increases the risk of human error. The variations in techniques among teams showed insufficient training.
- Corrective training was not implemented when audit teams were seen not following proper procedure.
- According to typical standards for conducting an RLA, ballots are counted once and any discrepancy is understood to be human error, which is why following proper counting procedures from the outset is critical.

Recommendations

The Fulton County Election Observation Mission offers the following recommendations for consideration for further improvement of the election process.

- After using a vendor to process and print the first bulk batch of 20,000 absentee ballots, the FCDRE used its own team of staff registrars to handle the remaining 20,000 requests that came in throughout the election. Although the vendor does have a maximum capacity (which was reached during the 2024 election), there likely is an alternative for mailing absentee ballots that is quicker and cheaper than handling the process in-house with a dozen staff working long hours. FCDRE leadership should **explore the feasibility of using an external service for all absentee-by-mail ballots for the next cycle**. If the FCDRE decides to keep processing some portion of absentee-ballot requests internally, it should ensure that those ballots are trackable through the postal system.
- The FCDRE performed well on logic and accuracy (L&A) testing, but improvements could be made regarding transparency of the process. Mission observers had access to the equipment and were allowed to watch the L&A process on individual machines and could verify the process and results. However, members of the general public were separated from the equipment by a barrier and did not have the same access. While there is a need to limit access during L&A testing to safeguard the equipment, transparency also is critical. The observation mission recommends that the FCDRE **consider ways to increase transparency and clarity during the L&A process for members of the public**. The Elections Hub offers an

excellent opportunity to improve public access. For instance, the access given to poll watchers and the public on Election Day was well planned and executed.

- The FCDRE could ***consider ways to use the L&A process as an educational tool***. For example, randomly selected individual machines could be brought to the public viewing area and staff members could discuss the process fully and perform L&A scripts. In this way staff can show the public how the L&A is completed and show the certification paperwork to the public. The staff can continue to perform L&A on equipment and produce the documentation certifying that staff have completed the process on each machine. This would allow the public to see how each piece of equipment is validated and verified and promote greater public acceptance of watching the majority of L&A from a distance.
- To ensure that all stakeholders, including voters, are aware of the locations and timelines for returning absentee-by-mail ballots, the observation mission recommends ***publicizing the times, dates, and locations for ballot return early in the election process***, ideally at the same time that advance voting locations are announced.
- The observation mission recommends that FCDRE staff ***identify and resolve discrepancies between ballot recap sheets and the number of physical ballots counted during canvassing prior to certification***. Any discovered discrepancies, the reasons for those discrepancies, and the actions that the FCDRE has decided to take to remedy those discrepancies should be announced publicly as soon as possible.
- As previously identified by The Carter Center in 2022, there is a need for ***further consideration and attention to ensuring voter secrecy during advance voting and on Election Day***. While election administrators are constrained by the size and layout of the spaces available to them to conduct in-person voting, as well as by the preference to retain spaces that are known to and popular with voters, every effort should be made to place equipment in a way to “assure the privacy of the voter,” as required by state law and regulation (SEB Rule 182-1-12.11.4). The FCDRE could further review the viability of privacy filters for all BMD screens to enhance secrecy, and the state should consider providing that equipment as needed for all counties, as it provided the original voting equipment. Further, the FCDRE should consider offering privacy folders so that the voter can maintain the secrecy of the vote while moving their printed ballot from the BMD to the scanner.
- The FCDRE should ***develop physical checklists for each procedure in the lead-up to the tabulation process***. Creating task checklists for all procedures, which are sometimes performed by temporary staff, will reduce the risk of mistakes during the preparation for tabulation and create consistency in performance.
- In the November general election and in the City of Atlanta runoff, observers noted isolated instances of equipment that had been used for advance voting being returned to the Elections Hub without having been properly sealed by poll managers at the precincts. The

mission recommends that the FCDRE ***emphasize proper sealing procedures when training polling managers***. Photo guides on how to properly seal equipment may be useful.

- The FCDRE should ***partner with vendors to ensure that all election-related equipment is well-maintained and functioning properly before it is needed for an election***. For example, the Tritex mail sorter purchased for the mailroom was not operational for long periods, which required staff to manually perform tasks over the course of hours that the sorter could have accomplished quickly. The phone system where poll managers called in to the Elections Hub also was not functioning properly on the morning of Election Day, leading to delays for voters.
- To increase the efficiency and accuracy of the risk-limiting audit, the FCDRE should ***place more emphasis on training on RLA counting with cross-stacking groups of 10 ballots***. The team also should conduct corrective training throughout the day for any audit teams that do not follow proper counting procedures.
- **The Fulton County Board of Registrations and Elections, along with FCDRE leadership, could consider a facilitated retreat to improve communication and cooperation.** Though political differences are expected on an election board, the Fulton board seemed at times to be especially contentious, with members talking at each other instead of to each other. Fulton County voters could be better served by a more collegial and cooperative approach.

Conclusion

The leadership and staff of the FCDRE, as well as the members of the Fulton County Board of Registrations and Elections, were cooperative in providing the access, information, and answers needed to conduct a thorough, credible observation effort. The 2024 processes and procedures were organized, orderly, and consistent, showing considerable improvement from the 2020 and the 2022 election cycles.

While no election is perfect and there were areas for potential improvement (as noted above), the overall conclusion is that the 2024 election in Fulton County was administered in a manner that was consistent with state laws, regulations, and procedures. Following those laws and regulations was the focus of FCDRE staff, as was providing a smooth, secure voting experience for Fulton County voters. The fact that FCDRE staff accomplished these goals in a tense political environment – while also dealing with multiple bomb threats to polling places on Election Day – shows both the resilience of their processes and the dedication and commitment of their workers.

The Monitoring Team and The Carter Center express their appreciation to the Fulton County Board of Registration and Elections, the leadership and staff of the Fulton County Department of Registration and Elections, and to the Fulton County poll workers for their cooperation with the observation mission.