

Declaration of Seth Keshel

Pursuant to 28 U.S.C Section 1746, I, Seth Keshel, make the following declaration.

1. I am over the age of 21 years and I am under no legal disability, which would prevent me from giving this declaration.
2. I am a trained data analyst with experience in multiple fields, including service in the United States Army as a Captain of Military Intelligence, with a one-year combat tour in Afghanistan. My experience includes political involvement requiring a knowledge of election trends and voting behavior.
3. I reside at (redacted).
4. My affidavit highlights substantial deviance from statistical norms and results regarding voting patterns in Georgia.
5. All 2020-related voting totals are taken from the Decision Desk HQ unofficial tracker, are not certified, and are subject to change from the time of the creation of this affidavit. Other voting totals are from the Georgia Secretary of State.
6. Georgia has not been won by a Democratic presidential candidate since 1992. Then-Senator Barack Obama received a large increase in Democratic votes in his first campaign (2008), earning 1,844,123 votes; however, his support plunged 3.81% in his reelection campaign, leaving him with 1,773,827 votes. In 2016, Hillary Clinton earned 1,877,963 votes, just 1.8% more than where Obama had been eight years before. Donald Trump had very little improvement over Mitt Romney in 2016, but has improved 17.7%

from his 2016 performance, an addition of 368,899 votes. This strong performance casts substantial doubt on a 31.6% improvement for Joe Biden on top of the Clinton total from just four years ago.

7. Metro Atlanta is full of votes, and the urban and suburban counties support Democratic candidates, while the exurban counties support Republican candidates. This shift was made complete when Cobb and Gwinnett Counties moved away from Donald Trump in 2016. The Atlanta region has added substantial voter registrations, which has not always correlated to a drastic increase in amount of votes cast. This year, Gwinnett and Henry Counties have already cast more than 40% more Democratic votes than in 2016, with Donald Trump still gaining votes in the counties. Cobb and Douglas Counties have now cast over 35% more Democratic votes than 2016, while all other metro Atlanta counties are up substantially from the 2012 and 2016 elections. Population growth can certainly drive turnout higher, but with the reported signature verification issues and transparency violations present in Georgia, these totals are highly suspect. The bar graph highlighting Democratic vote increases in the 12 most heavily Democrat-voting counties is contained in Exhibit A.
8. President Trump improved his margins in just 70 of 159 counties in the state, mostly in the southeast, but also in minority-heavy counties that he did not win. The most shocking losses of margin are in strong Republican counties that are not showing indications of flipping like Cobb or Gwinnett Counties did. President Trump backtracked 14% in Forsyth, 13% in Fayette, 12% in Paulding, 11%

in Cherokee, and 8% in Hall, all while compiling substantially more votes than in 2016, when many nominal Republican voters opted to support minor party candidates. Many rural counties in Northern Georgia have President Trump running 4-8%, or even worse, behind his performance in 2016, despite high voter registration percentages and overall vote increases. The major Republican counties (Forsyth, Fayette, Paulding, Cherokee, Hall) and heavily Republican rural areas showing heavy downward margin shift suggest that vote tabulation errors or machine troubles are present in Georgia and should be audited. Exhibit A contains a side-by-side comparison of the County Classification Map of Georgia and the current analysis of how margins have shifted in 2020 as President Trump struggles to hold on to his margins in Northern Georgia.

A handwritten signature in black ink, appearing to read 'Seth Keshel', with a stylized flourish extending to the right.

Seth Keshel

17 Nov. 2020