

AFFIDAVIT

I, the undersigned, Lisbeth A. Freeman, do hereby state:

1. I am a permanent resident and registered voter in Lee County, Florida and reside at 113 Albatross Street, Fort Myers Beach, FL 33931. I am also a practicing attorney in Florida and licensed to practice in Florida, New York, and Washington, DC.
2. On November 8, 2016, I served as County Counsel for the Hillary Clinton for America campaign as part of the Voter Protection Team. As County Counsel, I was present in the Lee County Democratic Headquarters from approximately 6:30 am until approximately 8:00 pm in the "boiler room" to field calls and incident reports from credentialed poll watchers ("PW") we had positioned at high priority precincts in Lee County. Those precincts were identified primarily by means of demographics and voting patterns. PW's were to enter incidents into the voter incident tracking system known as "LBJ."
3. The first call I took was at approximately 8-9 am regarding a man who was told he could not vote because he was no longer registered to vote. This incident occurred at Precinct #7, Manna Ministries, 4630 Palm Beach Blvd., Ft. Myers 33905. According to this man, he was a convicted felon, but had gone through the process of his voting rights being reinstated, and as such, was able to vote in the 2012 Presidential election. After being told he was not currently registered to vote, he was not offered a provisional ballot. The PW followed him outside and spoke to him and took an affidavit from the man. That affidavit was uploaded to LBJ. The voter departed without voting. Within a few minutes of his departure, I called him by his cell phone number provided in the incident report and instructed him that he has the right to submit a provisional ballot. He did return to the polling site and completed a provisional ballot. Our PW spoke to the Clerk and determined that the poll workers were not offering provisional ballots to voters unless the voter asked for it. The Clerk then agreed to instruct the poll workers to offer provisional ballots proactively. This resolution occurred by about 10 am.
4. Early during the course of election day, we received a high number of reports of individual voters attempting to check in at the precinct identified on the voting registration card mailed to voters by the Lee County Supervisor of Election (SOE) that were told they had reported to the wrong precinct and were directed to a different precinct. I do not have numbers on the frequency of this issue, but it was high enough that multiple PW's located at multiple precincts reported this same problem independently. One PW estimated that one out of every three voters were told they were at the wrong precinct. Another PW was told by a poll worker that the "vendor who mailed the registration cards messed up the precinct assignments" and the number of voters showing up at the wrong precinct was caused by this error.

5. This problem of voters being directed to the wrong precinct was frequent at many of our polling sites. The most extreme of these incidents was a woman who, with her fiance, first attempted to check in at the precinct identified on her voter registration card, Precinct 58 at the Veterans Park Rec Center in Lehigh Acres. She was told that she was at the wrong precinct and that she should report to a different site which she described as being "across from Walmart." At the second precinct, she was again told she was at the wrong location and was instructed to report to Precinct 52 at Christ United Methodist Church in Lehigh Acres. Again, when she attempted to check in she was told that she was still not at the right precinct. At this point she and her fiancé gave up as she was 8 months pregnant at the time and exhausted. She completed a provisional ballot but under Florida rules, that ballot was probably disqualified. After learning of all of these problems, I called the woman. She was at home and near tears when I asked about it. She said that no poll worker tried to help her figure out what was wrong, but instead just told her to go to a different precinct. We still do not know what the problem was. The poll watcher that reported this incident was Gini Gottman, and it was reported at 6:50 pm, so there was no time to fix the problem due to polls closing at 7 pm. The voter's name was Julie Kimmel. Her fiance's name was Jody Shavers. They were both denied the right to vote even though they were registered to vote. I further note that this couple was not the only incident of this sort as I saw reports of at least one other person who was sent to multiple precincts and never getting to vote.
6. As the day wore on, the number of wrong precinct voters began piling up and causing some delays as they tried to figure out what the problem was. PW's became upset at the high number of people being turned away, and as the time approached 7 pm, we understood that those voters would not have the opportunity to vote in this election.
7. While I was stationed in the boiler room, I also monitored incident reports being generated out of Broward County because I knew this was a location where there are frequent voter issues. I periodically checked LBJ in Broward and notice similar problems, but in addition I saw a large number of voters being told they were not registered to vote even though the voters seemed very clear that they were registered to vote. By the end of the day, I saw numerous reports from Broward PW's using all caps in their incident reports to draw attention to the problem because of the high frequency of the issue. I saw high levels of frustration among poll watchers there. Another issue that was occurring with frequency in Broward County were voters who were reported to be in the state voter database, but did not appear in the Broward County database and thus were only allowed to vote provisionally. I did not, however, engage with any of those poll watchers and thus my knowledge of those circumstances is limited.
8. In summary, I am of the opinion that there were serious systemic problems with the Florida voter database. The high frequency of the types of incidents I have described above leads me to believe that there was either a massive voter database corruption or, more importantly, possible intentional voter database manipulation either through state-maintained computers or through a third-party vendor database contracted to manage the database.

Under penalties of perjury, I declare that I have read this Affidavit and the facts stated in it are true.

Executed on this 2nd day of December, 2016

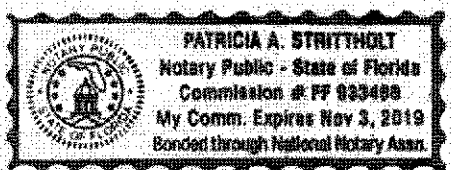
Signature: *Lisbeth A. Freeman*
Lisbeth A. Freeman

STATE OF FLORIDA
COUNTY OF LEE

I HEREBY CERTIFY that on this 2nd day of December, 2016, before me, an officer duly authorized in the State and County aforesaid, to take acknowledgements, personally appeared Lisbeth A. Freeman, who is personally known to me or has produced

() as identification and who did take this oath.

(seal)



Patricia A. Strittholt
Signature of Notary/Deputy Clerk

PATRICIA A. STRITTHOLT
Printed Name