

# WITNESS LIST

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STATE OF NORTH CAROLINA  
COUNTY OF CARTERET

IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION  
FILE NO.: 06-CVS-

In re Election Protest/Complaint of )  
Raymond E. Muns )  
)

AFFIDAVIT OF BONNIE JONES  
(OTHR)

I, Bonnie Jones, being first duly sworn, depose and say as follows:

1. I am a citizen of the United States and resident of the State of North Carolina.
2. I am over 18 years of age; I am not under any disability; and I am fully able to make the statements set forth in this Affidavit.
3. Except where expressly stated on the basis of information which has been provided to me and which I believe is true, the statements and facts contained in this Affidavit are based on my own personal knowledge and experience.
4. I was an observer at the Hand-to-Eye recount of the Nelms-Muns election conducted on Wednesday, November 29, 2006.
5. I observed a significant amount of ~~error and~~ confusion at Table 2.
6. The "Caller" was very laid-back and acted inattentive and disgusted.
7. At Table 1 I observed that one of the "Talliers" was not being properly overseen. The observer for the "Tallier" was not paying attention to the "Tallier" and was focused on something else.
8. Because of these irregularities my faith in the accuracy of the recount results is not as great as it should be in an election this close.



STATE OF NORTH CAROLINA  
COUNTY OF CARTERET

CARTERET COUNTY BOARD OF  
ELECTIONS

In re Election Protest/Complaint of  
Raymond E. Muns )  
 )  
 )

AFFIDAVIT OF GRACE GILLIKIN  
(OTHR)

I, Grace Gillikin, being first duly sworn, depose and say as follows:

1. I am a citizen of the United States and resident of the State of North Carolina.
2. I am a resident and registered voter of Carteret County.
3. I am over 18 years of age; I am not under any <sup>mental</sup> disability; and I am fully able to make the statements set forth in this Affidavit.
4. Except where expressly stated on the basis of information which has been provided to me and which I believe is true, the statements and facts contained in this Affidavit are based on my own personal knowledge and experience.
5. I was an observer at the Hand-to-Eye recount of the Nelms-Muns election on Wednesday, November 29, 2006.
6. I observed several problems with the recount process.
7. I observed several instances where the official count for a precinct, recorded on a chalk board or easel and calculated by adding the totals for the batches from that precinct, were mathematically wrong; i.e., the totals from each batch did not add up to the number being recorded as the sum. The arithmetic was simply wrong.
8. At Table 1 I observed the "Caller" look quickly at each ballot, call out the candidate's name, and then quickly place the ballot face-down in a pile. Based on this process, there is no way the observer reviewing the "Caller" could have observed what was recorded on each ballot.
9. Based on what I observed, I have no confidence in the accuracy of the results from the Hand-to-Eye recount. This is especially true given the closeness (three votes) of the totals for Mr. Nelms and Mr. Muns.

And further the Affiant sayeth not, this the 5th day of December, 2006.

Grace Gillikin (SEAL)  
Grace Gillikin

CARTERET COUNTY, NORTH CAROLINA

Sworn to (or affirmed) and subscribed before me this day by Grace Gillikin.  
(type/print name of signer)

Date December 5, 2006  
(Official Seal)

Sharon L. Lewis  
Signature of Notary Public

My commission expires: June 30, 2010

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STATE OF NORTH CAROLINA  
COUNTY OF CARTERET

CARTERET COUNTY BOARD OF  
ELECTIONS

In re Election Protest/Complaint of )  
Raymond E. Muns )

AFFIDAVIT OF CLARENCE WILLIAMS  
(OTHR)

I, Clarence Williams, being first duly sworn, depose and say as follows:

1. I am a citizen of the United States and resident of the State of North Carolina.
2. I am a resident and registered voter of Carteret County.
3. I am over 18 years of age; I am not under any disability; and I am fully able to make the statements set forth in this Affidavit.
4. Except where expressly stated on the basis of information which has been provided to me and which I believe is true, the statements and facts contained in this Affidavit are based on my own personal knowledge and experience.
5. I was a Tally Marker for Table/Team #3 at the Hand-to-Eye recount of the Nelms-Muns election held on Wednesday, November 29, 2006.
6. I was present for the morning shift of this recount.
7. When returning from a break, I observed confusion in the recount process at Table 2.
8. Table 2 had to repeat several of its counts because of discrepancies between its two Tally Markers.
9. This caused confusion among the team members at Table 2 as they did not seem to have a consistent system for breaking down the ballots into manageable batches for counting and reviewing purposes.
10. Table 2 was loud and distracting. I had to request relief <sup>one time</sup> ~~several times~~ because of the noise and confusion coming from that table.
11. Table 2 moved much faster in the actual calling and tallying process than the other tables. I do not see how the Tally Markers could verify what was being called given

the pace they were moving at. I believe it would be easy to get behind and have errors in such circumstances.

12. When I was relieved from my duties I assumed someone from my party would replace me; i.e., a Republican. When I passed by my table later, the woman who had been observing me was tallying and another person was observing her. Thus, at Table 3 there would have been two Democrats tallying and two Republicans observing them. This is inconsistent with how I understood the process was supposed to work.

13. I believe the process for the recount was excellent and administered well overall. However, I am not as confident in the accuracy of the results from Table 2 given the confusion that occurred there.

And further the Affiant sayeth not, this the 5th day of December, 2006.

Clarence A. Williams (SEAL)  
Clarence Williams

CARTERET COUNTY, NORTH CAROLINA

Sworn to (or affirmed) and subscribed before me this day by Clarence Williams.  
(type/print name of signer)

Date December 5, 2006

(Official Seal)

Sharon L. Lewis  
Signature of Notary Public

My commission expires: June 30, 2010

STATE OF NORTH CAROLINA  
COUNTY OF CARTERET

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Raymond E. Muns )  
)

AFFIDAVIT OF CLAY GILLIKIN  
(OTHR)

I, Clay Gillikin, being first duly sworn, depose and say as follows:

1. I am a citizen of the United States and resident of the State of North Carolina.
2. I am a resident and registered voter of Carteret County.
3. I am over 18 years of age; I am not under any disability; and I am fully able to make the statements set forth in this Affidavit.
4. Except where expressly stated on the basis of information which has been provided to me and which I believe is true, the statements and facts contained in this Affidavit are based on my own personal knowledge and experience.
5. I was an observer at the Hand-to-Eye Recount of the Nelms-Muns election conducted on Wednesday, November 29, 2006.
6. I was present at the recount process from the time it began at 9:00 AM until it finished around 6:30 PM.
7. I was able to observe the recount process at several of the tables, including Table 2.
8. I observed numerous problems with the recount process at Table 2, especially as compared to the other tables.
9. The "Caller" at Table 2 for most of the day repeatedly called out the wrong name and immediately had to correct himself.
10. The "Caller" at Table 2 eventually began to call out the names much faster than the "Callers" at the other tables and much faster than the "Tally" persons could follow.
11. The errors on the part of the "Caller" at Table 2 made it difficult for the "Tally" persons to collect a correct count and to operate efficiently.

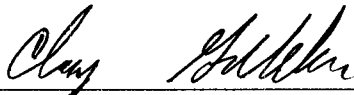
12. One of the "Tally" persons at Table 2 became visibly upset and frustrated, at one point throwing down her pencil.

13. The recount process at Table 2 had to be restarted several times because of problems with the calling. Specifically, the two "Tally" persons often ended up with inconsistent totals after a batch of ballots was completed. Because of this problem, Table 2 had to start over 2 to 3 times on just the first precinct it recounted.

14. These problems at Table 2 continued throughout the morning until the personnel at this table switched positions. Although this seemed to alleviate some of the problems, it did not completely eliminate them.

15. Because of the problems I observed at Table 2, I do not have confidence in the results obtained from that table's recount. This is especially true given the narrow results that were obtained from the recount as a whole: only 3 votes.

And further the Affiant sayeth not, this the 5th day of December, 2006.

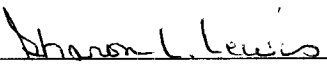
  
\_\_\_\_\_  
Clay Gillikin (SEAL)

CARTERET COUNTY, NORTH CAROLINA

Sworn to (or affirmed) and subscribed before me this day by Clay Gillikin.  
(type/print name of signer)

Date December 5, 2006

(Official Seal)

  
\_\_\_\_\_  
Signature of Notary Public

My commission expires: June 30, 2010

STATE OF NORTH CAROLINA  
COUNTY OF CARTERET

CARTERET COUNTY BOARD OF  
ELECTIONS

In re Election Protest/Complaint of  
Raymond E. Muns )  
 )  
 )

AFFIDAVIT OF NORMAN BOOTHE  
(OTHR)

I, Norman Booth, being first duly sworn, depose and say as follows:

1. I am a citizen of the United States and resident of the State of North Carolina.
2. I am a citizen and registered voter of Carteret County.
3. I am over 18 years of age; I am not under any <sup>mental</sup> disability; and I am fully able to make the statements set forth in this Affidavit.
4. Except where expressly stated on the basis of information which has been provided to me and which I believe is true, the statements and facts contained in this Affidavit are based on my own personal knowledge and experience.
5. I was an observer at the Hand-to-Eye recount of the Nelms-Muns election conducted on Wednesday, November 29, 2006.
6. I observed a significant amount of confusion and error at Table 2.
7. The "Talliers" at Table 2 often arrived at inconsistent totals. This required the table to stop its process and go back and attempt to reconcile the results. This happened several times.
8. I believe that the "Caller" at Table 2 was calling too fast for the "Talliers" to keep up. I believe this contributed to many of the problems at this table.
9. I observed that frequently, questions concerning the ballots were not referred to the entire three "judge" panel that was supposed to review them, but rather only one or two judges would come over and decide on the questionable ballots. This applied to the entire recount process and not just Table 2.
10. I observed that frequently the figures used to reach the official precinct results did not add up. These were recorded on a blackboard or easel and the batch totals for

each precinct were added to arrive at the official total for the precinct. The arithmetic was often incorrect. This applied to the entire recount process and not just Table 2.

And further the Affiant sayeth not, this the 5th day of December, 2006.

Norman F. Booth (SEAL)  
Norman Booth e

CAROLINA COUNTY, NORTH CAROLINA

Sworn to (or affirmed) and subscribed before me this day by Norman Booth<sup>e</sup>  
(type/print name of signer)

Date December 5, 2006

(Official Seal)

Sharon L. Lewis  
Signature of Notary Public

My commission expires: June 30, 2010

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