

IN THE CHANCERY COURT OF DAVIDSON COUNTY, TENNESSEE  
AT NASHVILLE

TENNESSEE DEMOCRATIC PARTY and )  
MARQUITA BRADSHAW FOR SENATE, )

Plaintiffs, )

v. )

No. )

MARK GOINS, Coordinator of Elections )  
and TRE HARGETT, Secretary of State for )  
the State of Tennessee, each in their official )  
capacity for the State of Tennessee, )

Defendants. )

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DECLARATION OF MARK GOINS

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I, Mark Goins, under penalty of perjury, do hereby declare as follows:

1. My position is Coordinator of Elections for the Division of Elections for the Tennessee Department of State, and I am competent to testify upon personal knowledge regarding the matters set forth herein.

2. I have served as the Coordinator of Elections since February 2009.

3. Plaintiffs allege in in paragraph 8 of their complaint that I and Secretary of State Tre Hargett have directed County Election Commissions across the State to deny requests for information about absentee-ballot voters, specifically, the names of individuals that have requested a mail-in ballot but have yet to return such a ballot in the November 3, 2020 election. This is a false statement. I have not given any such instructions to County Election Commissions across the state.

4. Plaintiffs also allege in paragraph 9 of their Complaint that they contacted “the offices of Defendants Tre Hargett and Mark Goins and were told that they would not provide the requested information.” My office has not received a public records request for the information from either the Tennessee Democratic Party or the Bradshaw for Senate campaign requesting information about voters who have not returned their ballots since the end of the early voting period for the November 3, 2020 election. There was no public records request to deny.

5. If I had received a public records request for the information, given all the duties to prepare for the election held on Tuesday preparing the list would not be practical for my office or most county offices. This office has never compiled a list with the requested information.

6. Knox County’s voter registration system is unique to Knox County and is different from the other counties. Specifically, Knox County’s voter registration system is maintained by staff that include election and non-election information technology staff members who are employees of Knox County. For special requests such as the request mentioned in the complaint Knox County IT compiles the data because Knox County election officials do not have the time to do so.

I declare under penalty of perjury that the foregoing is true and correct. Executed by me this 1 day of November 2020 at Nashville, Tennessee.

  
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MARK GOINS