

BONDURANT

Robert L. Ashe, III

Writer's Direct Dial
(404) 881-4169
ashe@bmelaw.com

September 29, 2025

Via U.S. First-Class Mail and Federal Express

Dekalb County Board Of Elections
4380 Memorial Drive #300
Decatur, Georgia 30032

2025 SEP 30 AM 10:44

DEKALB COUNTY BOARD OF ELECTIONS

RE: *Removal Proceedings from DeKalb County List of Electors for Christopher Mann*

Chairwoman Karli Swift and members of the DeKalb County Board of Elections:

My name is Robert L. Ashe III, and I am an attorney at Bondurant Mixson & Elmore LLP. I am also a resident of DeKalb County, Georgia.

This letter challenges the qualification of Christopher Mann to vote in DeKalb County. This board should remove Christopher Mann because eligibility requires that a person is "a resident of this State and of the county or municipality in which he or she seeks to vote." O.C.G.A. § 21-2-216 (a)(4). According to all available information, Christopher Mann is not currently a resident of DeKalb County and has not been a resident since, at least, June 2024. I respectfully request that this body remove Christopher Mann from the list of electors in DeKalb County. *See* O.C.G.A. § 21-2-229.

I. The Available Evidence Provides Sufficient Grounds to Remove Christopher Mann from the List of Electors in DeKalb County.

The General Assembly empowers residents of a Georgia county to challenge the qualification of electors in that county. This letter is written pursuant to that authority, and provides grounds for removal of Christopher Mann. *See* O.C.G.A. § 21-2-229 (a). In evaluating the grounds for a challenge to voting, this body should consider the following:

"[F]inancial independence; business pursuits; employment; income sources; residence for income tax purposes; age; marital status; residence of parents, spouse, and children, if any; leaseholds; sites of personal and real property owned by the applicant; motor vehicle and other personal property registration; National Change of Address program information sponsored by the United States Postal Service; and other such factors that the registrars may reasonably deem necessary to determine the qualification of an applicant to vote in a primary or election."

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DeKalb County Board of Elections
September 29, 2025
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O.C.G.A. § 21-2-217 (b)

The following evidence confirms that Christopher Mann is no longer a resident of DeKalb County, Georgia.

1. Christopher Mann resided with Elissa Falconer at 1312 Sargent Ave from June of 2020 through June of 2024.
2. Mr. Mann sold his residence at 1312 Sargent Avenue on September 17, 2024.
3. Mr. Mann is now a co-owner with Elissa Falconer of a property in Knoxville, TN. *See* 20008 Cecil Johnson Rd, Knoxville, TN 27921.
4. Residents of the Sargent Avenue neighborhood can testify that Mr. Mann has not lived in Georgia for, at least, a year.

Christopher Mann has departed from DeKalb County, and is no longer a resident at 1312 Sargent Ave. Accordingly, Christopher Mann should be stricken from the list of DeKalb electors.

II. Next Steps to Remove Christopher Mann from the List of Electors in DeKalb County.

After receiving this letter, this Board has **ten days** to provide notice, via first-class mail, to the mailing address shown on Christopher Mann's registration records at 1312 Sargent Avenue. *See* O.C.G.A. § 21-2-229 (b). This notice should include both this challenge letter and notice of a hearing that includes the date, time, and place of the hearing. O.C.G.A. § 21-2-229 (b). This hearing must take place between three and ten days after the subject party has been provided notice.

At that hearing, this board should consider the evidence presented that shows that Christopher Mann is not qualified to remain on the list of electors. At the conclusion of the hearing, "the registrars shall determine said challenge and shall notify the parties of their decision." O.C.G.A. § 21-2-229 (d).

Because this evidence is so clear that Christopher Mann is no longer a resident of DeKalb County, we request a prompt decision. We are prepared to provide witnesses, if necessary, to testify that Christopher Mann no longer lives at the address listed. In the meantime, we hope the receipt of this letter begins with the prompt removal of Christopher Mann from the DeKalb County list of electors. p

Sincerely,

/s/ Robert L. Ashe III
Robert L. Ashe III

2025 SEP 30 AM 10:29

DE KALB COUNTY BOARD OF ELECTIONS

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September 29, 2025

Via U.S. First-Class Mail and Federal Express

DeKalb County Board of Elections
4380 Memorial Drive #300
Decatur, Georgia 30032

2025 SEP 30 AM 10:24

DEKALB COUNTY BOARD OF ELECTIONS

Re: Removal Proceedings from DeKalb County List of Electors for Mark Toups

Chairwoman Karli Swift and members of the DeKalb County Board of Elections:

My name is Robert L. Ashe III, a resident of DeKalb County, Georgia. Professionally, I am an attorney for Bondurant Mixson & Elmore LLP. I write this letter as a citizen of DeKalb County.

This letter challenges the qualification of Mark Toups to vote in DeKalb County. This board should remove Mark Toups because eligibility requires that a person is "a resident of this State and of the county or municipality in which he or she seeks to vote." O.C.G.A. § 21-2-216 (a)(4). According to all available information, Mark Toups is not currently a resident of DeKalb County, and has not been a resident since, at least, 2024. I respectfully request that this body remove Mark Toups from the list of electors in DeKalb County. *See* O.C.G.A. § 21-2-229.

I. The Available Evidence Provides Sufficient Grounds to Remove Mark Toups from the List of Electors in DeKalb County.

The General Assembly empowers residents of a Georgia county to challenge the qualification of electors in that county. This letter is written pursuant to that authority, and provides grounds for removal of Mark Toups. *See* O.C.G.A. § 21-2-229 (a). In evaluating the grounds for a challenge to voting, this body should consider the following:

"financial independence; business pursuits; employment; income sources; residence for income tax purposes; age; marital status; residence of parents, spouse, and children, if any; leaseholds; sites of personal and real property owned by the applicant; motor vehicle and other personal property registration; National Change of Address program information sponsored by the United States Postal Service; and other such factors that the registrars may reasonably deem necessary to determine the qualification of an applicant to vote in a primary or election."

O.C.G.A. § 21-2-217 (b).

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DeKalb County Board of Elections
September 29, 2025
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The following evidence confirms that Mark Toups is no longer a resident of 1382 Sargent Ave, DeKalb County, Georgia.

1. Mark Toups' current vehicle registration is listed in Belle Chase, Louisiana.
2. Mark Toups has property deeds listed in Belle Chase, Louisiana.
3. Current owners and neighbors can testify that Toups does not live at 1382 Sargent Avenue.

Mark Toups has departed from this address in DeKalb County, and is no longer a resident at 1382 Sargent Avenue. Accordingly, Mr. Toups should be stricken from the list of DeKalb electors.

II. Next Steps to Remove Mark Toups from the List of Electors in DeKalb County.

After receiving this letter, this Board has **ten days** to provide notice, via first-class mail, to the mailing address shown on Mark Toup's registration records at 1382 Sargent Avenue. *See* O.C.G.A. § 21-2-229 (b). This notice should include both this challenge letter and notice of a hearing that includes the date, time, and place of the hearing. O.C.G.A. § 21-2-229 (b). This hearing must take place between three and ten days after the subject party has been provided notice.

At that hearing, this board should consider the evidence presented that shows that Mark Toups is not qualified to remain on the list of electors. At the conclusion of the hearing, "the registrars shall determine said challenge and shall notify the parties of their decision." O.C.G.A. § 21-2-229 (d).

Because this evidence is so clear that Mark Toups is no longer a resident of DeKalb County, we request a prompt decision. We are prepared to provide witnesses, if necessary, to testify that Mark Toups no longer lives at the address listed. In the meantime, we hope the receipt of this letter begins the prompt removal of Mark Toups from the DeKalb County list of electors.

Sincerely,
/s/ Robert L. Ashe III
Robert L. Ashe III

2025 SEP 30 PM 10:29

DEKALB COUNTY BOARD OF ELECTIONS

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September 29, 2025

Via U.S. First-Class Mail and Federal Express

DeKalb County Board of Elections
4380 Memorial Drive #300
Decatur, Georgia 30032

2025 SEP 30 AM 10:24
COUNTY BOARD OF ELECTIONS

Re: *Removal Proceedings from DeKalb County List of Electors for Jose Montanez*

Chairwoman Karli Swift and members of the DeKalb County Board of Elections:

My name is Robert L. Ashe III, and I am an attorney at Bondurant Mixson & Elmore LLP. I am also a resident of DeKalb County, Georgia.

This letter challenges the qualification of Jose Montanez to vote in DeKalb County. This board should remove Jose Montanez because eligibility requires that a person is "a resident of this State and of the county or municipality in which he or she seeks to vote." O.C.G.A. § 21-2-216 (a)(4). According to all available information, Jose Montanez is not currently a resident of DeKalb County and has not been a resident since, at least, June of 2024. I respectfully request that this body remove Jose Montanez from the list of electors in DeKalb County. See O.C.G.A. § 21-2-229.

I. The Available Evidence Provides Sufficient Grounds to Remove Jose Montanez from the List of Electors in DeKalb County.

The General Assembly empowers residents of a Georgia county to challenge the qualification of electors in that county. This letter is written pursuant to that authority, and provides grounds for removal of Jose Montanez. See O.C.G.A. § 21-2-229 (a). In evaluating the grounds for a challenge to voting, this body should consider the following:

"financial independence; business pursuits; employment; income sources; residence for income tax purposes; age; marital status; residence of parents, spouse, and children, if any; leaseholds; sites of personal and real property owned by the applicant; motor vehicle and other personal property registration; National Change of Address program information sponsored by the United States Postal Service; and other such factors that the registrars may reasonably

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DeKalb County Board of Elections

September 29, 2025

Page 2 of 2

deem necessary to determine the qualification of an applicant to vote in a primary or election.”

O.C.G.A. § 21-2-217 (b).

The following evidence confirms that Jose Montanez is no longer a resident of DeKalb County, Georgia.

1. Jose Montanez is currently working in and around Hope Mills, North Carolina.
2. Jose Montanez owned 1312 Sargent Avenue as far back as 2015; however, he sold the residence prior to even the two most recent sellers.
3. Neighbors can testify that Jose Montanez no longer lives at this residence, and the property deeds will show that Jose Montanez no longer owns this address.

Jose Montanez has departed from DeKalb County, and is no longer a resident at 1312 Sargent Avenue. Accordingly, Mr. Montanez should be stricken from the list of DeKalb electors.

II. Next Steps to Remove Jose Montanez from the List of Electors in DeKalb County.

After receiving this letter, this Board has **ten days** to provide notice, via first-class mail, to the mailing address shown on Jose Montanez’s registration records at 1312 Sargent Avenue. See O.C.G.A. § 21-2-229 (b). This notice should include both this challenge letter and notice of a hearing that includes the date, time, and place of the hearing. O.C.G.A. § 21-2-229 (b). This hearing must take place between three and ten days after the subject party has been provided notice.

At that hearing, this board should consider the evidence presented that shows that Jose Montanez is not qualified to remain on the list of electors. At the conclusion of the hearing, the registrars shall determine said challenge and shall notify the parties of their decision.” O.C.G.A. § 21-2-229 (d).

Because this evidence is so clear that Jose Montanez is no longer a resident of DeKalb County, we request a prompt decision. We are prepared to provide witnesses, if necessary, to testify that Jose Montanez no longer lives at the address listed. In the meantime, we hope the receipt of this letter begins the prompt removal of Jose Montanez from the DeKalb County list of electors.

Sincerely,

/s/ Robert L. Ashe III
Robert L. Ashe III

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September 29, 2025

Via U.S. First-Class Mail and Federal Express

DeKalb County Board of Elections
4380 Memorial Drive #300
Decatur, Georgia 30032

Re: Removal Proceedings from DeKalb County List of Electors for Margaret Parker

Chairwoman Karli Swift and members of the DeKalb County Board of Elections:

My name is Robert L. Ashe III, a resident of DeKalb County, Georgia. Professionally, I am an attorney for Bondurant Mixson & Elmore LLP. I write this letter as a citizen of DeKalb County.

This letter challenges the qualification of Margaret Parker to vote in DeKalb County. This board should remove Margaret Parker because eligibility requires that a person is "a resident of this State and of the county or municipality in which he or she seeks to vote." O.C.G.A. § 21-2-216 (a)(4). According to all available information, Margaret Parker is not a currently a resident of DeKalb County. I respectfully request that this body remove Margaret Parker from the list of electors in DeKalb County. *See* O.C.G.A. § 21-2-229.

I. The Available Evidence Provides Sufficient Grounds to Remove Margaret Parker from the List of Electors in DeKalb County.

The General Assembly empowers residents of a Georgia county to challenge the qualification of electors in that county. This letter is written pursuant to that authority, and provides grounds for removal of Elissa Falconer. *See* O.C.G.A. § 21-2-229 (a). In evaluating the grounds for a challenge to voting, this body should consider the following:

"financial independence; business pursuits; employment; income sources; residence for income tax purposes; age; marital status; residence of parents, spouse, and children, if any; leaseholds; sites of personal and real property owned by the applicant; motor vehicle and other personal property registration; National Change of Address program information sponsored by the United States Postal Service; and other such factors that the registrars may reasonably deem necessary to determine the qualification of an applicant to vote in a primary or election."

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September 29, 2025
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O.C.G.A. § 21-2-217 (b).

The following evidence confirms that Margaret Parker is no longer a resident at 1337 Sargent Ave in DeKalb County, Georgia.

1. Margaret Parker no longer lives at this address; the only evidence available is that Terrance Parker lives at this address.
2. Neighbors from Sargent Avenue can testify that Margaret Parker no longer lives at this residence.

Margaret Parker has departed from DeKalb County, and there is no evidence that she resides in this jurisdiction. Accordingly, Ms. Falconer should be stricken from the list of DeKalb electors.

II. Next Steps to Remove Margaret Parker from the List of Electors in DeKalb County.

After receiving this letter, this Board has **ten days** to provide notice, via first-class mail, to the mailing address shown on Margaret Parker's registration records at 1337 Sargent Avenue. See O.C.G.A. § 21-2-229 (b). This notice should include both this challenge letter and notice of a hearing that includes the date, time, and place of the hearing. O.C.G.A. § 21-2-229 (b). This hearing must take place between three and ten days after the subject party has been provided notice.

At that hearing, this board should consider the evidence presented that shows that Margaret Parker is not qualified to remain on the list of electors. At the conclusion of the hearing, "the registrars shall determine said challenge and shall notify the parties of their decision." O.C.G.A. § 21-2-229 (d).

Because this evidence is clear that Margaret Parker is no longer a resident of DeKalb County, we request a prompt decision. We are prepared to provide witnesses, if necessary, to testify that Margaret Parker no longer lives at the address listed. In the meantime, we hope the receipt of this letter begins the prompt removal of Margaret Parker from the DeKalb County list of electors.

Sincerely,
/s/ Robert L. Ashe III
Robert L. Ashe III

2025 SEP 30 AM 10:29

DEKALB COUNTY BOARD OF ELECTIONS

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September 29, 2025

Via U.S. First-Class Mail and Federal Express

DeKalb County Board of Elections
4380 Memorial Drive #300
Decatur, Georgia 30032

Re: Removal Proceedings from DeKalb County List of Electors for Elissa Falconer

Chairwoman Karli Swift and members of the DeKalb County Board of Elections:

My name is Robert L. Ashe III, a resident of DeKalb County, Georgia. Professionally, I am an attorney for Bondurant Mixson & Elmore LLP. I write this letter as a citizen of DeKalb County.

This letter challenges the qualification of Elissa Falconer to vote in DeKalb County. This board should remove Elissa Falconer because voting eligibility requires that a person is "a resident of this State and of the county or municipality in which he or she seeks to vote." O.C.G.A. § 21-2-216 (a)(4). According to all available information, Elissa Falconer is not currently a resident of DeKalb County, and has not been a resident since, at least, June of 2024. I respectfully request that this body remove Elissa Falconer from the list of electors in DeKalb County. *See* O.C.G.A. § 21-2-229.

I. The Available Evidence Provides Sufficient Grounds to Remove Elissa Falconer from the List of Electors in DeKalb County.

The General Assembly empowers residents of a Georgia county to challenge the qualification of electors in that county. This letter is written pursuant to that authority, and provides grounds for removal of Elissa Falconer. *See* O.C.G.A. § 21-2-229 (a). In evaluating the grounds for a challenge to voting, this body should consider the following:

financial independence; business pursuits; employment; income sources; residence for income tax purposes; age; marital status; residence of parents, spouse, and children, if any; leaseholds; sites of personal and real property owned by the applicant; motor vehicle and other personal property registration; National Change of Address program information sponsored by the United States Postal Service; and other such factors that the registrars may reasonably deem necessary to determine the qualification of an applicant to vote in a primary or election.

O.C.G.A. § 21-2-217 (b).

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DeKalb County Board of Elections

September 29, 2025

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The following evidence confirms that Elissa Falconer is no longer a resident of DeKalb County, Georgia.

1. Elissa Falconer is currently a surgeon with Premier Surgical at Fort Sanders Regional in Knoxville, TN.¹ Ms. Falconer was a resident at Emory University from June of 2017 until June of 2024.²
2. Elissa Falconer had vehicle registration in Georgia that transferred to Tennessee in 2024.
3. Elissa Falconer is a co-owner of a house in Knoxville, Tennessee, purchased in May 2025.
4. Ms. Falconer sold her residence at 1312 Sargent Avenue on September 17, 2024.

Elissa Falconer has departed from DeKalb County, and is no longer a resident at 1312 Sargent Avenue. Accordingly, Ms. Falconer should be stricken from the list of DeKalb electors.

II. Next Steps to Remove Elissa Falconer from the List of Electors in DeKalb County.

After receiving this letter, this Board has **ten days** to provide notice, via first-class mail, to the mailing address shown on Elissa Falconer's registration records at 1312 Sargent Avenue. See O.C.G.A. § 21-2-229 (b). This notice should include both this challenge letter and notice of a hearing that includes the date, time, and place of the hearing. O.C.G.A. § 21-2-229 (b). This hearing must take place between three and ten days after the subject party has been provided notice.

At that hearing, this board should consider the evidence presented that shows that Elissa Falconer is not qualified to remain on the list of electors. At the conclusion of the hearing, "the registrars shall determine said challenge and shall notify the parties of their decision." O.C.G.A. § 21-2-229 (d).

Because this evidence is so clear that Elissa Falconer is no longer a resident of DeKalb County, we request a prompt decision. We are prepared to provide witnesses, if necessary, to testify that Elissa Falconer no longer lives at the address listed. In the meantime, we hope the receipt of this letter begins the prompt removal of Elissa Falconer from the DeKalb County list of electors.

Sincerely,
/s/ Robert L. Ashe III
Robert L. Ashe III

¹ See <https://www.premiersurgical.com/physicians/elissa-a-falconer-md/>

² See <https://www.linkedin.com/in/elissa-falconer-260ba014b/>

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September 29, 2025

Via U.S. First-Class Mail and Federal Express

DeKalb County Board of Elections
4380 Memorial Drive #300
Decatur, Georgia 30032

Re: *Removal Proceedings from DeKalb County List of Electors for Ronald Van Leaks*

Chairwoman Karli Swift and members of the DeKalb County Board of Elections:

My name is Robert L. Ashe III, a resident of DeKalb County, Georgia. Professionally, I am an attorney for Bondurant Mixson & Elmore LLP. I write this letter as a citizen of DeKalb County.

This letter challenges the qualification of Ronald Van Leaks to vote in DeKalb County. This board should remove Ronald Van Leaks because eligibility requires that a person is "a resident of this State and of the county or municipality in which he or she seeks to vote." O.C.G.A. § 21-2-216 (a)(4). According to all available information, Ronald Van Leaks is not currently a resident at the address listed. I respectfully request that this body remove Ronald Van Leaks from the list of electors in DeKalb County. *See* O.C.G.A. § 21-2-229.

I. The Available Evidence Provides Sufficient Grounds to Remove Ronald Van Leaks from the List of Electors in DeKalb County.

The General Assembly empowers residents of a Georgia County to challenge the qualification of electors in that county. This letter is written pursuant to that authority, and provides grounds for removal of Ronald Van Leaks. *See* O.C.G.A. § 21-2-229 (a). In evaluating the grounds for a challenge to voting, this body should consider the following:

"financial independence; business pursuits; employment; income sources; residence for income tax purposes; age; marital status; residence of parents, spouse, and children, if any; leaseholds; sites of personal and real property owned by the applicant; motor vehicle and other personal property registration; National Change of Address program information sponsored by the United States Postal Service; and other such factors that the registrars may reasonably deem necessary to determine the qualification of an applicant to vote in a primary or election."

O.C.G.A. § 21-2-217 (b).

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DeKalb County Board of Elections
September 29, 2025
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The following evidence confirms that Ronald Van Leaks is no longer a resident of 1417 Smith Street, DeKalb County, Georgia.

1. Ronald Van Leaks no longer lives at this address; he sold this property in 2021.
2. Leaks has a vehicle registration from February of 2023 at 1060 W. Harris St. Pavo, GA 31778.
3. Current owners of the address are willing to testify that they, and not Mr. Leaks, are owners and residents of the property at 1417 Smith Street.

Ronald Van Leaks has departed from 1417 Smith Street, and there is no evidence that she resides in this jurisdiction. Accordingly, Mr. Leaks should be stricken from the list of DeKalb electors.

II. Next Steps to Remove Ronald Van Leaks from the List of Electors in DeKalb County.

After receiving this letter, this Board has **ten days** to provide notice, via first-class mail, to the mailing address shown on Ronald Van Leaks's registration records at 1417 Smith St. *See* O.C.G.A. § 21-2-229 (b). This notice should include both this challenge letter and notice of a hearing that includes the date, time, and place of the hearing. O.C.G.A. § 21-2-229 (b). This hearing must take place between three and ten days after the subject party has been provided notice.

At that hearing, this board should consider the evidence presented that shows that Ronald Van Leaks is not qualified to remain on the list of electors. At the conclusion of the hearing, "the registrars shall determine said challenge and shall notify the parties of their decision." O.C.G.A. § 21-2-229 (d).

Because of this evidence that Ronald Van Leaks is no longer a resident of DeKalb County, we request a prompt decision. We are prepared to provide witnesses, if necessary, to testify that Ronald Van Leaks no longer lives at the address listed. In the meantime, we hope the receipt of this letter begins the prompt removal of Ronald Van Leaks from the DeKalb County list of electors.

Sincerely,
/s/ Robert L. Ashe III
Robert L. Ashe III