

Case No.

*In re. Investigation of election irregularities affecting  
counties within the 9th Congressional District*

# Exhibit

## 7.1.1.2

Description: Harris Committee evidentiary exhibits submitted under Paragraph 8 of the Order of Proceedings (Exhibit 6.1.1).



**NORTH CAROLINA**  

---

**STATE BOARD OF ELECTIONS**

# Exhibit 7.1.1.2

**STATE OF NORTH CAROLINA**

**COUNTY OF BLADEN**

## **AFFIDAVIT OF BOBBY R. LUDLUM**

I, Bobby R. Ludlum, being duly sworn, depose and say as follows:

1. I am over 18 years of age and I suffer from no legal disability. I am competent to testify concerning the matters stated herein and the statements contained in this Affidavit are based upon my personal knowledge.

2. I am a retired Air Force Command Chief Master Sergeant and grew up in Bladen County, North Carolina. After serving 31 years in the United States Air Force, I retired with my wife to Bladen County. Since 1996, I have worked regularly as a volunteer poll worker at the polls in Bladen County. In 2012, I was appointed to the Bladen County Board of Elections and have served as Chairman for most of the past four years.

3. As part of my duties with regard to the Bladen County Board of Elections, I regularly interact with members of the staff, including the Elections Director, and am responsible for overseeing compliance of the Bladen County Board of Elections with applicable state and federal election laws.

4. The Bladen County Board of Elections operates in a secure and proper manner. Our elections staff properly secures absentee ballots and other confidential and sensitive information under the jurisdiction of the Board.

5. No Bladen County citizen or other individual has, to my knowledge, ever been given special access to information held by the Bladen County Board of Elections, such as requests for absentee ballots or election results. Our staff provides requested public information as required by law to all citizens.

6. I have read the December 19, 2018 affidavit of Jens Lutz, a former, short-term, Democratic member of the Bladen County Board of Elections. Mr. Lutz served on the Bladen County Board of Elections only from April 2018 until his abrupt resignation on December 8, 2018. Mr. Lutz's affidavit contains false information. Specifically, and first, neither Leslie McCrae Dowless, Jr. nor any other unauthorized person was allowed to take and

## Exhibit 7.1.1.2

copy un-redacted absentee ballot request forms with confidential information on them. This was not allowed. Second, Mr. Dowless was not given greater access to absentee ballot or other information than was given to other citizens. Third, our elections office security was not lax. Fourth, the number of absentee ballots recorded by the elections staff has not been different on multiple occasions from the number of absentee ballots presented to the Bladen County Board of Elections. These statements by Mr. Lutz are not true.

7. With regard to the election staff's count of absentee ballots, I know of only one instance when the number of absentee ballots recorded by the elections staff has been different from the number of absentee ballots presented to the Bladen County Board of Elections. In 2018, when counting the absentee ballots, the Board fed absentee ballots into the D200 ballot counting scanner machine and we came up with one (1) ballot more than the initial staff count of absentee ballots. We eventually realized that the discrepancy was due to the fact that we received an emailed military absentee ballot that does not have an envelope. The one-ballot discrepancy was solved when two of our Board members recounted the absentee ballot envelopes and took the military ballot into account. All members of the Bladen County Board of Elections concurred that was the reason for the discrepancy.

8. Mr. Lutz stated that the Bladen County Board of Elections found forged absentee ballot request forms in 2018. We did and we reported the incident promptly to the State Board of Elections and Ethics Enforcement ("State Board of Elections"). A lady dropped off 165 absentee ballot request forms for the 2018 general election at our Bladen County Board of Elections office. About two to three weeks before the general election, we discovered that three (3) of the forms were forged. One of the three was for a relative of mine who told me that two women had asked if he wanted to request a form. He said no. Our elections staff reported the information to the State Board of Elections staff and requested instructions on how to proceed. The State Board of Elections staff told us to mail the absentee ballots to all 165 of the people named on the ballot request forms except for the three (3) that we knew were incorrect. We complied with those orders, and the State Board of Elections investigator, Joan Fleming, followed up on the investigation after the election.

9. Mr. Lutz stated that our former Elections Director, Cynthia Shaw, could access mail-in absentee ballot results prior to Election Day. It may be that Ms. Shaw had that technological ability but I am not aware of her ever obtaining these results prior to Election Day.

## Exhibit 7.1.1.2

10. The Bladen County Board of Elections retains absentee ballots in a locked room in its office building. Contrary to what Mr. Lutz stated in his affidavit, the key to the absentee ballot room is not kept on a wall in the Bladen County Board of Elections office. Rather, it is kept in the Elections Director's office in a secure location. When I have gone into the absentee ballot room in the past, I have gone accompanied by the Elections Director, who has always obtained the key from her office and accompanied me when I visit the room. In order to maintain security, I do not enter the room by myself. Based on what I know, the Elections Director has not allowed persons to go into the ballot room without being accompanied by her.

11. I have read the December 19, 2018 affidavit of Benjamin M. Snyder, the Chairman of the Bladen County Democratic Party. In it, Mr. Snyder falsely states that I told Mr. Snyder that Leslie MacRae Dowless, Jr. had told Elections Director Cynthia Shaw that he throws ballots in the trash. That is not a true statement. I am not aware of anyone in Bladen County ever throwing ballots in the trash or stating that they have thrown absentee ballots or any type of ballot in the trash.

12. No election protest regarding the Ninth Congressional District election in 2018 was ever filed with the Bladen County Board of Elections.

13. Since the State Board of Elections refused to certify the Ninth Congressional District election at its November 27, 2018 meeting, I have heard many false statements from people alleging errors in the operations of Bladen County elections.

14. I do not have knowledge about what individual groups have done with regards to collecting absentee ballots but I know that the Bladen County Board of Elections has processed all ballots received -- whether by mail-in or hand-delivered absentee ballot, one-stop voting, early voting or voting on Election Day -- in a manner that complies with guidance from the State Board of Elections. In the case of mailed absentee ballots, once the ballot leaves the Bladen County Board of Elections office, we do not have control over the ballots until they are returned to the Bladen County Board of Elections office.

15. Our Bladen County Board of Elections and its staff work hard to make sure that Bladen County citizens receive the public information that they request, know the rules regarding ballots, voting, and other election-related issues. While there may be individuals outside of the Bladen County Board of Elections who have not followed all of the rules regarding absentee ballots, as was alleged in 2016 and 2018, Bladen County elections officials have

# Exhibit 7.1.1.2

operated elections in Bladen County in a manner that is fair to all citizens and in accordance with State law.

This the 10<sup>th</sup> day of January, 2019.

Bobby R. Ludlum  
Bobby R. Ludlum

STATE OF NORTH CAROLINA

COUNTY OF BLADEN

Sworn to (or affirmed) and subscribed before me this the 10<sup>th</sup> day of January, 2019.

Brandon R. Pragosa  
Notary Public

(Official Seal)



My Commission Expires:

June 27<sup>th</sup>, 2023