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Ann B. Harris - 56  
FEB 23, 2023 04:26 PM



Connie Taylor, Clerk of Superior Court  
Cobb County, Georgia

**IN THE SUPERIOR COURT OF COBB COUNTY  
STATE OF GEORGIA**

**KELI GAMBRILL, and** )  
**LARRY SAVAGE,** )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
**COBB COUNTY, GEGORIA, and** )  
**COBB COUNTY BOARD OF** )  
**ELECTIONS AND REGISTRATION,** )  
 )  
Defendants. )  
 )  
 )  
 )  
 )  
 )

**CIVIL ACTION FILE NO.**

**VERIFIED COMPLAINT and PETITION FOR WRIT OF MANDAMUS**

COME NOW Plaintiffs Keli Gambrill (“Ms. Gambrill”) and Larry Savage (“Mr. Savage”) [collectively, the “Plaintiffs”] and hereby file this Complaint and Petition for Writ of Mandamus against Cobb County, Georgia (the “County”) and Cobb County Board of Elections and Registration (“BOE”) [collectively, the “Defendants”], respectfully showing this honorable Court the following:

**PARTIES, JURISDICTION AND VENUE**

1.

Mr. Savage is an individual who maintains his principal place of residence in Cobb County, Georgia. He is a registered voter within the State of Georgia. He regularly attends meetings of the Cobb County Board of Commissioners (the “BOC”), votes in elections for the BOC, and has, himself, been a candidate for county commissioner. He is a voter in Cobb County Commission district 3 under the Legislative Redistricting Map of Act 562. Under the map that was illegally amended by the County, Mr. Savage would be a resident of district 2.

Due to the effective date timing and details of the County's amendment, Mr. Savage voted in the November 8, 2022, general election to elect a county commissioner to represent the interests of district 3 on the BOC. However, Mr. Savage has a continuing interest in voting in future elections for the district for which he has been constitutionally determined a resident. He also has an interest in ensuring that the commissioners who are elected to represent his district obtain their positions legally and constitutionally as a fair reflection of the district's vote. Mr. Savage has a legally protected interest in ensuring his vote fairly and legally translates into representation on the BOC and that his district and the county at large is represented fairly and constitutionally. He is interested in having the laws executed and the public duty in question enforced and need not show any legal or special interest. This is sufficient to render him a proper plaintiff to this matter. *See* O.C.G.A. §9-6-24.

2.

Ms. Gambrill is an individual who maintains her principal place of residence in Cobb County, Georgia and is a registered voter within the State of Georgia. She has voted and intends to continue to vote in the future in elections in Cobb County, including those for the BOC. Ms. Gambrill is also a member of the BOC. She brings this action not in her official capacity as a County Commissioner, but as an individual resident and registered voter of Cobb County; however, in both roles as an individual and a commissioner, she has an interest in having the BOC comprised of a group of individuals who have been elected in a fair and constitutional manner and who legally wield authority derived from a fair and constitutional election. She is interested in having the laws executed and the public duty in question enforced and need not show any legal or special interest. This is sufficient to render her a proper plaintiff to this matter. *See* O.C.G.A. §9-6-24.

3.

Cobb County is a political subdivision of the State of Georgia. It is operated by the Cobb County BOC. For purposes of this lawsuit, the BOC is one and the same as the County, and all actions described herein undertaken by the BOC are considered action by the County.

4.

The Cobb County Board of Elections and Registration (the "BOE") is a board created by the General Assembly with the powers and duties of the election superintendent for primary and general elections, including but not limited to the registration of voters, absentee ballot procedures, and early voting, inspecting the conduct of elections to ensure honestly, efficiently, and uniformly conducted, to certify the results of all primaries and elections. *See* O.C.G.A. §21-2-40.

5.

Jurisdiction and venue are proper in this Court pursuant to the Georgia Constitution, Art.VI, Sec.II, Para.VI. *See Brown v. Johnson*, 251 Ga. 436 (1983). The actions complained of occurred and continue to occur in Cobb County.

### **BACKGROUND FACTS**

6.

After the 2020 U.S. census, it became apparent that the existing district map for Cobb County, Georgia needed to be revised to reflect the new data. The purpose of this matter is to determine which of two alternative maps is the proper and binding county commission district map for Cobb County. This requires a summary of the pertinent legislation and actions by two different governmental entities – the Georgia General Assembly and the BOC - that resulted in two different maps, one enacted by the General Assembly pursuant to HB 1154 (which

ultimately became known as Act 562 on March 2, 2022), and another purportedly enacted by the BOC using its home rule authority. This redistricting was necessitated by the results of the 2020 U.S. census.

7.

On January 25, 2022, the BOC voted on agenda item no. 27 “to approve the proposed commission district map created based on the results of the 2020 U.S. Census.” The text of the agenda item explained that the districts needed to be “modified in order to remain compliant with the one person – one vote requirement of the United States Constitution. **Under Georgia law, the General Assembly is vested with the sole authority to draw new districts.**” BOC Agenda Item No. 27, attached hereto as **EXHIBIT 1** (emphasis added). Despite this direct admonishment that the County did not have authority, the BOC voted 3:2 to approve its own map.

8.

On February 1, 2022, in the General Assembly, Rep. John Carson filed HB 1154, “A BILL to be entitled an Act to amend an Act creating the Board of Commissioners of Cobb County, approved June 19, 1964 (Ga. L. 1964, Ex. Sess., p. 2075), as amended, particularly by an Act approved April 10, 2014 (Ga. L. 2014, p. 3893), so as to change the description of the commissioner districts; to provide for definitions and inclusions; to provide for continuation in office of current members; to provide for election and terms of office of subsequent members; to provide effective dates; to repeal conflicting laws; and for other purposes.” This bill introduced an amended districting map with new boundary lines for Cobb County Commission districts (the “Legislative Redistricting Map”).<sup>1</sup> Ultimately, this bill was passed by the Georgia

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<sup>1</sup> A more detailed timeline of the progression of HB 1154 follows (all dates in year 2022):

General Assembly on February 24, 2022, and was signed by the Governor and became effective on March 2, 2022, as Act 562. [Hereinafter, all references to Act 562 include HB 1154].

9.

On February 7, 2022, Rep. David Wilkerson filed "A BILL to be entitled an Act to amend an Act creating the Board of Commissioners of Cobb County, approved June 19, 1964 (Ga. L. 1964, Ex. Sess., p. 2075), as amended, particularly by an Act approved April 10, 2014 (Ga. L. 2014, p. 3893), so as to change the description of the commissioner districts; to provide for definitions and inclusions; to provide for continuation in office of current members; to provide for election and terms of office of subsequent members; to provide effective dates; to repeal conflicting laws; and for other purposes." This bill became known as HB1256. On February 8, 2022, HB 1256 was withdrawn.

10.

On September 16, 2022, a Notice of Proposed Amendment to an Act Creating the Board of Commissioners of Cobb County was posted in the Marietta Daily Journal (Ref. MDJ7537 gpn13). The Second and Third Notices were published on September 23, 2022, and September 25, 2022, respectively.

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Feb. 2: House First Readers; Feb. 3: House Second Readers; Feb. 10: House Committee Favorably Reported HB 1154; Feb. 14: House Third Readers, House Passed/Adopted HB 1154, and House immediately transmitted to Senate HB 1154; Feb. 15: Senate read and referred HB 1154 and Senate withdrawn & recommitted HB 1154; Feb. 17: Senate committed favorably reported HB 1154; Feb. 22: Senate read second time; Feb. 24: Senate third read and Senate passed/adopted HB 1154; March 1: House sent to Governor HB 1154; March 2: House date signed by Governor HB 1154, HB 1154 now recorded as Act 562, and Act 562 effective date March 2, 2022.

11.

On October 3, 2022, Rep. Ed Setzler provided an official opinion letter from the Georgia Office of Legislative Counsel to members of the Cobb County delegation members of the General Assembly. This letter explained that the BOC did not have authority under either the Constitution or Georgia statutes to utilize the home rule powers to enact its own redistricting. A true and correct copy of this letter is attached as **EXHIBIT 2**.

12.

On October 11, 2022, the BOC voted on agenda item no. 41 "[t]o adopt a resolution amending Act 562, a local law that amended the local Act creating the Board of Commissioners of Cobb County, approved June 19, 1964 (Ga. L. 1964, Ex. Sess., p. 2075), as amended, particularly by an Act approved April 10, 2014 (Ga. L. 2014, p. 3893) so as to change the descriptions of the Commissioner districts; to provide for definitions and inclusions; to provide for continuation in Office of current members; to provide effective dates; to repeal conflicting laws; and for other purposes." The vote passed 3:2.

13.

On October 25, 2022, the BOC voted on agenda item no. 31 "[t]o adopt a resolution amending Act 562, a local law that amended the local Act creating the Board of Commissioners of Cobb County, approved June 19, 1964 (Ga. L. 1964, Ex. Sess., p. 2075), as amended, particularly by an Act approved April 10, 2014 (Ga. L. 2014, p. 3893) so as to change the descriptions of the Commissioner districts; to provide for definitions and inclusions; to provide for continuation in Office of current members; to provide effective dates; to repeal conflicting laws; and for other purposes." The vote passed 3:2 during the pendency of early voting for the November 2022 election.

14.

This was the second vote on the resolution and, as a result, the County adopted its own redistricting map (the "County Redistricting Map"), through the amendment of Act 562, allegedly pursuant to its home rule powers. This action was memorialized in a Resolution Amending Local Law (the "Resolution"). A true and correct copy of the Resolution is attached as **EXHIBIT 3**. The Resolution cited HB 1256 and Art.IX, Sec.II, Para.1 of the Georgia Constitution (which sets forth the home rule powers). The County asserts that the Resolution was a valid amendment of Act 562 and that the County Redistricting Map is the valid and legally enforceable map.

15.

The Resolution contained the following language: "WHEREAS, during the 2022 legislation session of the 156th General Assembly of the State of Georgia, the majority of the legislators representing Cobb County ("Cobb County's local delegation") supported House Bill 1256 ("HB 1256"), which redrew the electoral district lines for Districts 1 through 4 of the Cobb County Board of Commissioners in accordance with the description contained in Appendix A of HB 1256, which was attached to and made a part of HB 1256 and which was further identified as "User: HD038 Plan Name: CobbCC-HD-038-Draft3- 2021 Plan Type: local[.]" This is false and misleading, as HB 1256 was never recorded by the Cobb delegation in the General Assembly, and unanimous support of the delegation was a required element for passage. The Resolution further falsely claimed that a vote on HB 1256 had occurred on January 25, 2022, when in fact, HB 1256 had not even been presented to the Legislature at that time. HB 1256 was not presented until February 7, 2022, and only at that time did it receive its House Bill number assignment. Moreover, the background statement in the agenda item

considering the proposed Resolution specifically stated that the General Assembly has “sole authority to draw new districts.” Nonetheless, the BOC disingenuously and falsely claimed home rule authority for the amendment effecting its own map, when the BOC knew from the outset that no such authority existed.

16.

Upon conclusion of the October 25, 2022 BOC meeting, the Chair signed the Resolution, which was then overnighted to, and received by, the Georgia Secretary of State (the “SOS”) on October 26, 2022. An amendment is not effective until filed with the SOS. *See Ga. Const. Art.IV, Sec.II, Para.1(g)*. The home rule authority guidelines indicate that an amendment is effective when filed; however, language in the Resolution purported to delay effectiveness of the amendment until January 1, 2023. Specifically, the Resolution states: “The members of the Board of Commissioners of Cobb County shall be elected as provided in this subsection to the districts as newly described in this section. **Effective January 1, 2023**, the electoral district lines for Districts 1-4 of the Board of Commissioners of Cobb County are as described in Section 2(b) of this Act and in Appendix A to this Resolution. These electoral district lines will be used for elections for Cobb County Commission Districts 1-4 occurring on or after January 1, 2023. **Elections occurring between March 2, 2022, and December 31, 2022 will be based upon the electoral district lines as originally established by unamended Act 562**, identified as ‘User: HD046 Plan Name: CobbCC HD046 2022 Plan Type Local.’ Appendix B, attached hereto and made a part of this Act, contains a description of those electoral lines and also contains a map showing the boundary lines for the electoral districts for the Cobb County Board of Commission as established by Act 562, unamended.” *See* Resolution, previously attached as **Exhibit 3** (emphasis added).



17.

The Georgia statutes provide that the General Assembly is the proper entity to enact redistricting legislation and adopt redistricting maps. The statutes prescribe a mechanism by which a county may seek introduction and adoption of a particular map for districts within its boundaries, but this is to be accomplished through adherence to a specific procedure that requires the legislature's approval and ultimately results in enactment by the General Assembly. *See* O.C.G.A. §28-1-14.1. Nowhere does it allow for county action inconsistent with the General Assembly's chosen and enacted plan via local level amendment. Yet this is what the BOC has attempted in adopting the Resolution in an effort to circumvent the authority of the General Assembly.

18.

Residents of districts 1 and 3 voted for their commissioners in the 2022 general election. Act 562 provided that the new boundary lines would not be implemented until January 1, 2023, and the purported amendment of the map contained in the County's Resolution also had an effective date of January 1, 2023. However, Act 562 provided that the elections for districts 1 and 3 would be undertaken according to the new Legislative Redistricting Map. Therefore, the Cobb County residents of districts 1 and 3 voted in November 2022 based on their districts as set forth in the Legislative Redistricting Map. On November 8, 2022, the BOE certified the 2022 election results according to the Legislative Redistricting Map.

19.

On December 8, 2022, Rep. Ed Setzler sent to BOE the opinion letter, previously attached as **Exhibit 2**, which explained why the BOC did not have redistricting authority. The details were discussed in a meeting with Tori Silas, the Chairman of the BOE.

20.

The home rule powers upon which the Board of Commission relies is found in the Georgia State Constitution at Art.IX, Sec.II, Para.1. This provision grants counties certain authority to enact or amend legislation related to its own governance. “The governing authority of each county shall have legislative power to adopt clearly reasonable ordinances, resolutions, or regulations relating to its property, affairs, and local government for which no provision has been made by general law[.]” Ga. Const. Art.IX, Sec.II, Para.1(a) (emphasis added).

Alternatively, a county may amend local laws under certain circumstances. “Except as provided in subparagraph (c), a county may, as an incident of its home rule power, amend or repeal the local acts applicable to its governing authority” under one of two different procedures. Ga. Const. Art.IX, Sec.II, Para.1(b) (emphasis added).

21.

“The General Assembly may by general law preempt a local law and may by general law restrict the manner in which a county regulates.” *Clayton County v. Otis Pruitt Homes, Inc.*, 250 Ga. 505, 506 (1983). The General Assembly has already enacted a general law to govern the adoption of redistricting maps for county commission districts, which includes the procedure by which the affected county may undertake to submit its own map for approval and enactment. This is contained in O.C.G.A. §28-1-14.1. This statute preempts any attempt by the County to present and enact its own districting map except in accordance with the statute.

Having been preempted by general law, the County is constitutionally and statutorily prohibited from exercising home rule authority to enact legislation on this matter. *See* Ga. Const. Art.IX, Sec.II, Para.1(c), (c)(2); *Clayton County v. Otis Pruitt Homes, Inc.*, 250 Ga. 505, 506 (1983).

22.

There is an explicit exception to the home rule powers, which prohibits the county from taking action in “matters which the General Assembly by law has preempted” or any “[a]ction affecting the composition, form, procedure for election or appointment, compensation, and expenses and allowances in the nature of compensation of the county governing authority[.]” Ga. Const. Art.IX, Sec.II, Para.1(c), (c)(2).

23.

The County’s amendment of the redistricting map is also a prohibited use of home rule authority because it is a clear interference with composition, form, or procedure for election of the county governing authority. By filing the illegal amendment and purportedly changing the district map, the BOC created a conflict for the BOE in carrying out its duties. If valid, the amendment would have become effective immediately upon filing, but the BOC inserted a delayed effective date of January 1, 2023, into the text of the Resolution. This created a situation where the November 2022 election was taking place at a time when the amendment was allegedly effective but the County Redistricting Map was not being enforced. The Cobb County voters were being asked to vote according to the Legislative Redistricting Map that would not govern after the newly elected commissioners took their oaths. The BOE was being asked to certify an election based on a map that had already allegedly, although illegally and invalidly, been amended. In sum, the Resolution was an overt misuse and abuse of the home rule authority, and the County Redistricting Map is illegal, unconstitutional, and not binding.

24.

There is no statutory or constitutional authority for the County's use of home rule powers to enact redistricting legislation.

25.

This has been acknowledged at the State level by both the Attorney General's Office and the Secretary of State's Office.

26.

Georgia State Attorney General Chris Carr has stated that the County's vote to amend the map was "inappropriate and not legally binding."

27.

C. Ryan Germany, general counsel for the Secretary of State, cautioned that the ministerial act of filing the amendment did not render it legally effective and explicitly stated that "it appears that the Amendment is very likely an unauthorized exercise of authority by the Cobb County Commission that does not comply with Georgia law or the Georgia Constitution." See Letter from C. Ryan Germany to H. William Rowling, Jr., County Attorney for Cobb County, dated December 22, 2022, attached as **EXHIBIT 4**. Mr. Germany further warned the BOE that proceeding with invalid boundary lines could warrant sanctions against the BOE for improperly placing voters in their voting districts. See previously attached **Exhibit 4**.

28.

The limited authority of the County and its mandatory deference to the state legislature in redistricting matters has even been recognized by the BOC Chair Lisa Cupid. On February 3, 2023, she acknowledged that "State leaders do not have to consult leaders that represent locally on the BOC, School board, or House of Representatives."

29.

The County claims it was given advice and instruction as to the limits of its home rule authority. The Association of County Commissioners of Georgia (“ACCG”) has published information about the home rule powers and spelled out what the county commissioners can and cannot do under the guise of such authority. This publication warns commissioners to “[k]eep in mind that the constitution spells out specific EXCEPTIONS to the exercise of county home rule power, regardless of whether it is first tier or second tier. These exceptions include any action: (1) Affecting any elective county office, the salaries thereof, except the personnel subject to the jurisdiction of the county governing authority.” Despite the warnings of the ACCG, the County ignored the list of express constitutional prohibitions on home rule application and attempted to amend Act 562 and implement its own redistricting map.

30.

“Legislative acts in violation of this Constitution or the Constitution of the United States are void, and the judiciary shall so declare them.” Ga. Const. Art.I, Para.V, et seq. The Resolution amending the Legislative Redistricting Map is invalid, illegal, and unconstitutional. A declaratory judgment to this effect is necessary, as the County refuses to comply on its own.

31.

Sovereign immunity is waived as to declaratory actions against a county or state agency, as well as for any injunctive relief necessary to implement the court’s judgment. See Ga. Const. Art.I, Sec.2, Para.5(b)(1).

32.

Pursuant to *Mobley v. Polk County*, 242 Ga. 798, 801-02 (1979), “[n]either the counties of the state nor their officers can do any act, make any contract, nor incur any liability not

authorized by some legislative act applicable thereto. If there is reasonable doubt of the existence of a particular power, the doubt is to be resolved in the negative. Powers of county commissioners are strictly limited by law, and they can do nothing except under authority of law.”

33.

Any authority for a county BOC to undertake its own redistricting must be derived from an explicit statutory or constitutional grant of authority. None exists in this case to support the County’s Resolution and attempted amendment of Act 562. *See Camp v. Williams*, 314 Ga. 699 (2022).

34.

Powers of county boards of commissioners are limited. Georgia counties do not enjoy any statutory or constitutional authority to enact redistricting legislation, and in fact, the Constitution specifically prohibits counties from undertaking such action. The General Assembly is the only appropriate body to enact new districting maps when necessary. *See* O.C.G.A. §28-1-14.1; *Smith v. Cobb County Bd. of Elections and Registrations*, 314 F.Supp.2d 1274, 1314 (N.D. Ga. 2002); *Bodker v. Taylor*, 2002 U.S. Dist. LEXIS 27447 (N.D. Ga. 2002).

**COUNT I – MANDAMUS**  
**AGAINST ALL DEFENDANTS**

35.

Plaintiffs reassert and reallege the foregoing paragraphs, as if more fully stated herein.

36.

Mandamus is appropriate where, as here, officials fail to perform or improperly perform their duties, a petitioner demonstrates a legal right to the relief sought, and there is no specific legal remedy for the failure to perform. *See* O.C.G.A. §9-6-20.

37.

The County is governed by the BOC, which was created as the governing authority pursuant to O.C.G.A. §36-5-20 and an Act creating the BOC of Cobb County, approved June 19, 1964 (Ga. L. 1964, Ex. Sess. P. 2075), as amended.

38.

The BOE is statutorily obligated to carry out lawful and constitutional elections, whose duties include but are not limited to: receiving and determining the sufficiency of nomination petitions of candidates filing notice of their candidacy with him or her; receiving from poll officers the returns of all primaries and elections, to canvass and compute the same, and to certify the results thereof to such authorities as may be prescribed by law; and conducting all elections in such manner as to guarantee the secrecy of the ballot and to perform such other duties as may be prescribed by law. *See* O.C.G.A. §§21-2-70, 21-2-74.

39.

The County is bound to defer to and comply with the valid acts of the Legislature, including Act 562. The County cannot take action on “matters which the General Assembly by general law has preempted or may hereafter preempt[.]” Const. Art.IX, Sec.II, Para.1(c).

40.

The County has limited power to amend their local acts by resolution or ordinance under the “home rule powers” set forth in Georgia Constitution, Art. IX, Sec. II, Para.1.

These home rule powers are expressly limited when relating to reappointment or redistricting. The home rule powers may not be relied upon to take “action affecting any elective county office” or “action affecting the composition, form, procedure for election or appointment . . . of the governing authority.” Const. Art. IX, Sec.II, Para.1(c)(1), (c)(2).

41.

The Legislature undertook its duty to adopt a new district plan for the Board. The Legislature’s redistricting plan was outlined in HB 1154, which was approved and passed by the Legislature and signed into law by the Governor on March 2, 2022, and is known as Act 562.

42.

The County cannot rely upon their home rule powers to enact their own redistricting plan, not only because the Legislature has preempted this field by enacting its own plan in Act 562, but also because such use of the powers to affect the procedure for election of its commissioners is prohibited by the Constitution. Moreover, the procedure for enacting redistricting legislation has already been prescribed by general law in O.C.G.A. §28-1-14.1. The County’s only path for obtaining the district map of its preference was through the specified procedure contained in O.C.G.A. §28-1-14.1. Rather than comply with this statutory method, the County instead, illegally and invalidly, tried to avoid the statutory requirements by resorting to home rule powers that it does not possess.

43.

The County is legally obligated to recognize, adhere to, and comply with the Legislative Redistricting Plan.



44.

The County has demonstrated its unwillingness to comply with its duty to adhere to the legally binding Legislative Redistricting Plan by enacting its own redistricting plan and refusing to withdraw it after being informed of its illegality.

45.

The BOE is legally obligated to recognize, adhere to, comply with, proceed with elections in accordance with, and to certify elections results in accordance with the Legislative Redistricting Plan.

46.

Given the County's stance and actions, there is no alternative legal remedy aside from a writ of mandamus compelling the County to recognize the Legislative Redistricting Plan as the sole binding districting plan for Cobb County and to disregard and disavow its own improper redistricting plan.

47.

The County's non-compliance with its mandatory duties under O.C.G.A. § is sufficient to justify a Writ of Mandamus.

48.

Plaintiffs have "no other specific legal remedy" for the County's "failure to perform" its public duty. *See* O.C.G.A. § 9-6-20.

49.

This Complaint and Petition concerns one of public right whose object is to procedure the enforcement of a public duty. Plaintiffs are interested in having the laws executed and the

duties in question enforced so that their voting and representation rights and those of their fellow citizens are fairly and constitutionally protected and enforced. *See* O.C.G.A. § 9-6-24.

50.

Petitioners demanded a hearing under the provisions of O.C.G.A. §9-26-27.

**COUNT II**  
**DECLARATORY RELIEF**  
**AGAINST DEFENDANT COBB COUNTY, GEORGIA ONLY**

51.

Plaintiff reasserts and realleges the foregoing paragraphs, as if more fully stated herein.

52.

Declaratory relief is proper “to settle and afford relief from uncertainty and insecurity with respect to rights, status and other legal relations[.]” O.C.G.A. §9-4-1.

53.

In order to have standing under the Declaratory Judgment Act, a plaintiff need only show that the issuance of a declaratory judgment is necessary “to settle and afford [them] relief from uncertainty and insecurity with respect to rights, status, and other legal relations.” O.C.G.A. 9-4-1. “Declaratory relief is available where a legal judgment is sought that would control or direct future action,” under circumstances where that action might jeopardize or affect the rights, liabilities, or interests of the party seeking the declaratory judgment. *See, e.g., Head v. DeKalb County*, 246 Ga.App. 756, 760 (Ga. Ct. App. 2002); *Royal Lepage Real Estate Svcs. of Atlanta v. Spalding Partners, Ltd.*, 192 Ga.App. 284, 284-85 (384 S.E.2d 424 (Ga. Ct. App. 1989).

54.

The County has demonstrated its unwillingness to adhere to the legally valid and binding Legislative Redistricting Map set forth in Act 562 and continues to instead promote its own redistricting map that relies on illegal and invalid boundary lines drawn by the County improperly based on a misuse of its home rule powers.

55.

A legal judgment declaring the Legislative Redistricting Map to be the controlling and legally binding map, effective as of January 1, 2023, and ordering the County to comply with this map retroactively and proactively, is required to ensure that citizens of Cobb County are being fairly and constitutionally represented.

**COUNT III**  
**ATTORNEYS' FEES**  
**AGAINST ALL DEFENDANTS**

56.

Plaintiffs reassert and reallege the foregoing paragraphs, as if more fully stated herein.

57.

As a direct and proximate result of the above-alleged allegations and averments, Plaintiffs have incurred substantial attorneys' fees and costs.

58.

The County and the BOE have acted in bad faith with respect to their obligations and has caused Plaintiffs unnecessary trouble and expense.

59.

Therefore, Plaintiffs are entitled to reimbursements of their expenses of litigation, including attorneys' fees and court costs, in an amount to be proven.

**WHEREFORE**, Plaintiffs pray as follows:

- (1) That this Court issue a Mandamus Nisi (proposed order attached hereto) as soon as practicable, directing the Defendant to be and appear before this Court within not less than ten nor more than thirty days, as required by O.C.G.A. §9-6-27(a), then and there to be heard, and show cause, if any they have, why a writ of mandamus absolute should not be granted;
- (2) That Cobb County, Georgia and the Cobb County Board of Elections and Registrations be served with process in accordance with Georgia law;
- (3) That this Court set a hearing on this matter pursuant to O.C.G.A. § 9-6-27;
- (4) That this Court enter a writ of mandamus:
  - a. Compelling Cobb County, Georgia to: (i) withdraw its purported Resolution to Amend Act 562; (ii) acknowledge that the County Redistricting Map based on HB 1256 is not legally valid, binding, or enforceable; (iii) acknowledge that the Legislative Redistricting Map set forth in Act 562 is the controlling, legally binding districting map for Cobb County; and (iv) take all action necessary to ensure that only those commissioners who are validly, legally, and constitutionally permitted to serve in their capacities as commissioners have taken and continue to take in the future all official county governance actions;
  - b. Compelling the Cobb County Board of Elections and Registrations to: (i) refuse to certify any elections based on the illegal and invalid County Redistricting Map set forth in the Resolution; and (ii) require all future elections proceed in accordance with the boundary lines of the Legislative Redistricting Map set

forth in Act 562 (Ga. L. 2022, p.5295), as passed by the General Assembly and signed into law by the Governor.

(5) That this Court enter an Order declaring that:

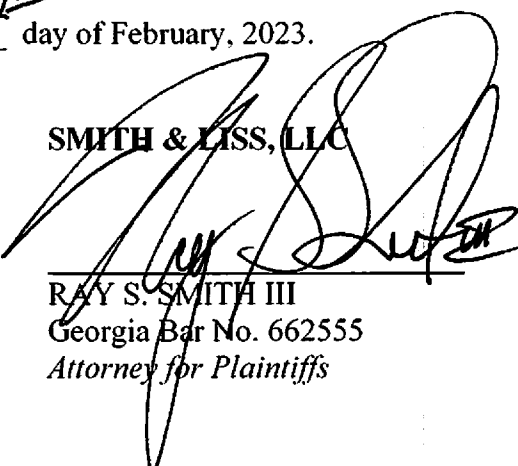
- a. The Resolution passed by the Cobb County Board of Commissioners on October 25, 2022, was in contravention of the Constitutional requirements and limitations of the home rule authority and is therefore unconstitutional, invalid, null and void;
- b. The Legislative Redistricting Map contained in Act 562 (Ga. L. 2022, p.5295), as passed by the General Assembly and signed into law by the Governor is the legal and binding districting map for Cobb County Commission districts;

(6) That this Court award to Plaintiff their reasonable attorneys' fees and costs of litigation; and

(7) That this Court grant such further relief as it deems just and proper.

Respectfully submitted this 22<sup>nd</sup> day of February, 2023.

**SMITH & LISS, LLC**

  
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STATE OF GEORGIA**

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**CIVIL ACTION FILE NO.**

**VERIFICATION OF COMPLAINT AND  
PETITION FOR WRIT OF MANDAMUS**

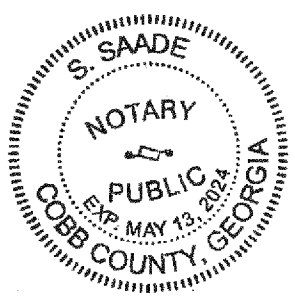
Personally appeared before the undersigned officer, duly authorized to administer oaths, KELI GAMBRILL, who, upon first being duly sworn on oath, deposes and states that to the best of her knowledge, information, and belief, the facts contained in the COMPLAINT AND PETITION FOR WRIT OF MANDAMUS are true and correct.

Keli Gambrell  
KELI GAMBRILL

SWORN TO AND SUBSCRIBED TO ME  
THIS 21 DAY OF FEBRUARY, 2023.

S. Saade  
NOTARY PUBLIC

MY COMMISSION EXPIRES: 5-13-2024  
[NOTARY SEAL]



**IN THE SUPERIOR COURT OF COBB COUNTY  
STATE OF GEORGIA**

**KELI GAMBRILL, and** )  
**LARRY SAVAGE,** )  
  
Plaintiffs, )  
  
v. )  
  
**COBB COUNTY, GEGORIA, and** )  
**COBB COUNTY BOARD OF** )  
**ELECTIONS AND REGISTRATION,** )  
  
Defendants. )  
\_\_\_\_\_ )

**CIVIL ACTION FILE NO.**

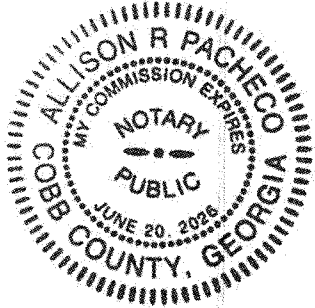
**VERIFICATION OF COMPLAINT AND  
PETITION FOR WRIT OF MANDAMUS**

Personally appeared before the undersigned officer, duly authorized to administer oaths, LARRY SAVAGE, who, upon first being duly sworn on oath, deposes and states that to the best of his knowledge, information, and belief, the facts contained in the COMPLAINT AND PETITION FOR WRIT OF MANDAMUS are true and correct.

  
\_\_\_\_\_ )  
LARRY SAVAGE

SWORN TO AND SUBSCRIBED TO ME  
THIS 21<sup>st</sup> DAY OF FEBRUARY, 2023.

  
\_\_\_\_\_ )  
NOTARY PUBLIC



MY COMMISSION EXPIRES: 06/20/2026  
[NOTARY SEAL]

# **EXHIBIT 1**





## Deputy County Manager

Jimmy Gisi, Deputy County Manager

Districts All

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**TO:** Dr. Jackie R. McMorris, County Manager

**FROM:** Jimmy Gisi, Deputy County Manager

**DATE:** January 25, 2022

### **PURPOSE**

To approve the proposed commission district map created based on the results of the 2020 U.S. Census.

### **BACKGROUND**

The results of the 2020 U.S. Census show that the current Board of Commissioners districts need to be modified in order to remain compliant with the one person-one vote requirement of the United States Constitution. Under Georgia law, the General Assembly is vested with the sole authority to draw new districts. The Cobb Delegation Chairman, upon conducting one-on-one meetings with each of the Commissioners, has prepared a proposed redistricting map which will be introduced for passage during the current session of the General Assembly. It has been requested that the Board of Commissioners take an official vote that demonstrates the support of a majority of the members of the Commission.

### **IMPACT STATEMENT**

N/A

### **FUNDING**

N/A

### **RECOMMENDATION**

The Board of Commissioners consider and vote upon the proposed redistricting map attached.

### **ATTACHMENTS**

1. Cobb Redistricting Map
2. Associated Population Data

# **EXHIBIT 2**



Ed Setzler <edsetzler@gmail.com>

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## Opinion Letter - Office of Legislative Counsel

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Ed Setzler <edsetzler@gmail.com>


Mon, Oct 3, 2022 at 10:28 PM

To: John Carson <John.Carson@house.ga.gov>, Erick Allen <Erick.Allen@house.ga.gov>, Ginny Ehrhart <Ginny.Ehrhart@house.ga.gov>, Erica Thomas <Erica.Thomas@house.ga.gov>, Michael Smith <Michael.Smith@house.ga.gov>, David Wilkerson <David.Wilkerson@house.ga.gov>, Roger Bruce <Roger.Bruce@house.ga.gov>, Teri Anulewicz <Teri.Anulewicz@house.ga.gov>, Sharon Cooper <Sharon.Cooper@house.ga.gov>, Don Parsons <Don.Parsons@house.ga.gov>, Mary Frances Williams <MaryFrances.Williams@house.ga.gov>, Lindsey Tippins <Lindsey.Tippins@senate.ga.gov>, Michael Rhett <Michael.Rhett@senate.ga.gov>, Horacena Tate <Horacena.Tate@senate.ga.gov>, Jennifer Jordan <Jen.Jordan@senate.ga.gov>, Kay Kirkpatrick <kay.kirkpatrick@senate.ga.gov>, Bruce Thompson <Bruce.Thompson@senate.ga.gov>, Devan Seabaugh <Devan.Seabaugh@house.ga.gov>, Mitchell Kaye <Mitchell.Kaye@house.ga.gov>, Sheila Jones <Sheila.Jones@house.ga.gov>

Cobb Delegation Members, attached is the official opinion letter from the Office of Legislative Counsel regarding the Cobb County Board of Commissioner's purported ability to be able to redistrict county commission districts by home rule.  
Respectfully, Ed Setzler, HD-35

Sent from my iPhone

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 47H035100322.pdf  
723K

Rich Ruskell  
Legislative Counsel



316 State Capitol, S.W.  
Atlanta, Georgia 30334  
(404) 656-5000

Office of Legislative Counsel  
General Assembly of Georgia

October 3, 2022

Representative Ed Setzler  
District 35  
By E-mail to [ed.setzler@house.ga.gov](mailto:ed.setzler@house.ga.gov)

RE: Cobb County Board of Commissioners' redistricting powers

Dear Representative Setzler,

You have requested an opinion from this office as to the ability of the Cobb County Board of Commissioners to use either its constitutional home rule powers or statutory authority to approve a new district plan for the board. As explained below, it appears that county governing authorities do not have constitutional or statutory home rule redistricting powers.

The home rule powers of Georgia counties arise from the state Constitution. Article 9, Section 2, Paragraph 1 of the Constitution of Georgia authorizes counties to amend their local acts by resolution or ordinance, but subparagraph (c) sets forth limitations on this authority. While none of those limitations expressly reference apportionment, districts, reapportionment, or redistricting, subparagraphs (c)(1) and (c)(2) have some bearing on your question by prohibiting a county's use of the home rule power to effect either "[a]ction affecting any elective county office" or "[a]ction affecting the composition, form, **procedure for election** or appointment...of the county governing authority." (Emphases added).

It is practically indisputable that a county home rule resolution or ordinance changing the boundaries of the districts from which county commissioners are elected would be an action

affecting the procedure for election of the county's governing authority<sup>1</sup>. So it would appear there is no constitutional authority for counties to use their home rule powers to enact redistricting legislation. Additionally, while the governing authorities of Georgia municipalities have a limited statutory home rule authority to undertake their own reapportionment or redistricting, O.C.G.A. § 36-35-4.1, no such statutory authority exists for Georgia counties.

Far from being broad or expansive, the powers of county boards of commissioners is fairly limited.

Neither the counties of this state nor their officers can do any act, make any contract, nor incur any liability not authorized by some legislative act applicable thereto. If there is reasonable doubt of the existence of a particular power, the doubt is to be resolved in the negative. Powers of county commissioners are strictly limited by law, and they can do nothing except under authority of law.

*Mobley v. Polk County*, 242 Ga. 798, 801-802 (1979) (internal citations omitted). As such, any authority for a county board of commissioners to undertake its own redistricting must be derived from an explicit constitutional or statutory grant of authority. In the event there is any doubt as to whether or not such authority has been granted, Georgia law requires a finding that no such authority has been given. Furthermore, five of the current Justices on the Georgia Supreme Court recently reminded government entities that are dependent on statutory authority that "the absence of statutory authority is the absence of legal authority to act." *Camp v. Williams*, \_\_ Ga. \_\_, (2022), Case No. S23A0073 at 26, J. Bethel concurring.

While my research has revealed no helpful Georgia cases directly relating to redistricting powers of counties, the United States District Court for the Northern District of Georgia has held Georgia counties lack any constitutional or statutory authority to enact redistricting legislation. *Bodker v. Taylor*, 2002 U.S. Dist. LEXIS 27447 (N.D. Ga., 2002) at 11-13. The district court went on to find that "the General Assembly is the only legislative body with the power to enact redistricting legislation" for Georgia counties. *Id* at 12. And directly on point

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<sup>1</sup>The Cobb County Board of Commissioners is the governing authority of Cobb County pursuant to O.C.G.A. § 36-5-20 and an Act creating the Board of Commissioners of Cobb County, approved June 19, 1964 (Ga. L. 1964, Ex. Sess., p. 2075), as amended.

regarding redistricting in Cobb County, another federal district court judge in the Northern District referenced *Bodker* in her ruling regarding redistricting the county's board of commissioners following the 2000 United States Census, and directed the General Assembly, **not** the board of commissioners, to undertake its "duty" to adopt a new district plan for the board. *Smith v. Cobb County Bd. of Elections & Registrations*, 314 F. Supp. 2d 1274, 1314 (N.D. Ga., 2022).

Based on the fact that the Georgia Constitution explicitly prohibits counties from using home rule powers on matters affecting the procedures for election of county commissioners, the lack of any statutory redistricting powers, and the findings of the United States District Court for the Northern District of Georgia (including the holding in a case directly related to redistricting in Cobb County), it appears that the Cobb County Board of Commissioners lacks any authority to adopt or enact any resolutions or ordinances that change the boundaries of one or more of the election districts provided for in an Act creating the Board of Commissioners of Cobb County, approved June 19, 1964 (Ga. L. 1964, Ex. Sess., p. 2075), as amended, in particular the current commission district boundaries provided for in HB 1154 (Ga. L. 2022, p. 5295).

I hope this information is useful. Please do not hesitate to contact me if you have got any questions or if I can be of further assistance.

Sincerely,

/s/ D. Stuart Morelli  
D. Stuart Morelli  
Deputy Legislative Counsel

Approved for release: /s/RR

# **EXHIBIT 3**

**RESOLUTION AMENDING LOCAL LAW**

*Amending Act 562, a local Act that amended the local Act creating the Board of Commissioners of Cobb County, approved June 19, 1964 (Ga. L. 1964, Ex. Sess., p. 2075), as amended, particularly by an Act approved April 10, 2014 (Ga. L. 2014, p. 3893) so as to change the description of the commissioner districts; to provide for definitions and inclusions; to provide for continuation in office of current members; to provide effective dates; to repeal conflicting laws; and for other purposes.*

**WHEREAS**, during the 2022 legislation session of the 156th General Assembly of the State of Georgia, the majority of the legislators representing Cobb County (“Cobb County’s local delegation”) supported House Bill 1256 (“HB 1256”), which redrew the electoral district lines for Districts 1 through 4 of the Cobb County Board of Commissioners in accordance with the description contained in Appendix A of HB 1256, which was attached to and made a part of HB 1256 and which was further identified as “User: HD038 Plan Name: CobbCC-HD-038-Draft3-2021 Plan Type: local”;

**WHEREAS**, on January 25, 2022, the Cobb County Board of Commissioners considered the electoral district lines in proposed bill HB 1256 and the majority of the Board voted to adopt the revised electoral district lines set forth in that bill;

**WHEREAS**, HB 1256 was never voted upon by the General Assembly;

**WHEREAS**, the minority of Cobb County’s local delegation supported House Bill 1154 (“HB 1154”), which redrew the electoral district lines for Districts 1 through 4 of the Cobb County Board of Commissioners in accordance with the description contained in Appendix A of HB 1154, which was attached to and made a part of HB 1154 and which was further identified as “User: HD046 Plan Name: CobbCC-HD046-2022 Plan Type: Local”;

**WHEREAS**, HB 1154 was approved by the Georgia House of Representatives on February 14, 2022; approved by the Georgia Senate on February 24, 2022; and was signed by the Governor on March 2, 2022 and became effective as of March 2, 2022; and is now known as Act 562;

**WHEREAS**, Article 9, Section 2, Paragraph 1 of the Georgia Constitution confers upon Georgia counties the power to exercise home rule authority to amend or repeal local legislation provided the legislation does not address eight subject matters that are specifically enumerated within the Georgia Constitution or address other matters that have been preempted by general law;

**WHEREAS**, the drawing of electoral district lines does not fall within any of the eight enumerated subject areas set forth in the Home Rule Amendment to the Georgia Constitution where home rule authority has been preempted nor is redistricting preempted by general law;

**WHEREAS**, the electoral district boundary lines contained in HB 1256 were drawn by staff at the General Assembly’s Office of Legislative & Congressional Reapportionment for the General Assembly, who have expertise in the drawing of electoral district lines;



**WHEREAS**, the electoral district lines established in HB 1256 satisfy all legal requirements contained in the United States Constitution, the Georgia Constitution, and the Voting Rights Act of 1965; and

**WHEREAS**, the electoral district lines established by HB 1256 satisfy the traditional redistricting principles of compactness, contiguity, respect for political boundaries, preserving communities of interest, and protection to incumbents.

**NOW, THEREFORE, BE IT RESOLVED:** in the exercise of its constitutional authority to amend or repeal local legislation, the Cobb County Board of Commissioners hereby amends an Act creating the Board of Commissioners of Cobb County, approved June 19, 1964 (Ga. L. 1964, Ex. Sess., p. 2075), as amended, particularly by an Act approved April 10, 2014 (Ga. L. 2014, p. 3893) so as to change the description of the commissioner districts, and as amended by Act 562 effective on March 2, 2022 (collectively “Local Legislation”) as follows:

1. Section 2 of the Board of Commissioners’ Local Legislation relating to the members of the Board of Commissioners and their districts is amended by striking it in its entirety and replacing in lieu thereof the following:

“SECTION 2.

(a) Those members of the Board of Commissioners of Cobb County who are serving as such on January 1, 2022, and any person selected to fill a vacancy in any such office shall continue to serve as such members until the regular expiration of their respective terms of office and upon the election and qualification of their respective successors.

(b) For purposes of electing members of the board of commissioners, other than the chairperson who is elected at large as provided in Section 3, Cobb County is divided into four commissioner districts. One member of the board shall be elected from each such district. Effective January 1, 2023, ~~the~~ four commissioner districts shall be and correspond to those four numbered districts described in Appendix A attached to and made a part of this Act and further identified as ~~‘User: HD046 Plan Name: CobbCC-HD046-2022 Plan Type Local’~~ ‘User: HD038 Plan Name: Cobb CC-HD038-Draft3-2021 Plan Type: local.’ Appendix A also contains a map showing the boundary lines for the Cobb County Commission’s electoral districts.

(c)(1) For the purposes of such plan:

(A) The term ‘VTD’ shall mean and describe the same geographical boundaries as provided in the report of the Bureau of the Census for the United States decennial census of 2020 for the State of Georgia. The separate numeric designations in a district description with are underneath a VTD heading shall mean and describe individual Blocks within a VTD as

provided in the report of the Bureau of the Census for the United States decennial census of 2020 for the State of Georgia; and

(B) Except as otherwise provided in the description of any district, whenever the description of any district refers to a named city, it shall mean the geographical boundaries of that city as shown on the census maps for the United States decennial census of 2020 for the State of Georgia.

(2) Any part of Cobb County which is not included in any district described in subsection (b) of this section shall be included within that district contiguous to such part which contains the least population according to the United States decennial census of 2020 for the State of Georgia.

(3) Any part of Cobb County which is described in subsection (b) of this section as being in a particular district shall nevertheless not be included within such district if such part is not contiguous to such district. Such noncontiguous part shall instead be included within that district contiguous to such part which contains the least population according to the United States decennial census of 2020 for the State of Georgia.”

2. Section 4 of the of the Cobb County Board of Commissioners’ Local Legislation relating to the effective date of electoral district lines is deleted in its entirety and inserted in lieu thereof the following:

“SECTION 4.

~~(a) The members of the Board of Commissioners of Cobb County shall be elected as provided in this subsection to the districts as newly described in this section. Effective January 1, 2023, the electoral district lines for Districts 1-4 of the Board of Commissioners of Cobb County are as described in Section 2(b) of this Act and in Appendix A to this Resolution. These electoral district lines will be used for elections for Cobb County Commission Districts 1-4 occurring on or after January 1, 2023. Elections occurring between March 2, 2022 and December 31, 2022 will be based upon the electoral district lines as originally established by unamended Act 562, identified as ‘User: HD046 Plan Name: CobbCC HD046 2022 Plan Type Local.’” Appendix B, attached hereto and made a part of this Act, contains a description of those electoral lines and also contains a map showing the boundary lines for the electoral districts for the Cobb County Board of Commission as established by Act 562, unamended.~~

~~(b) The chairperson and the members from Commissioner Districts 2 and 4 shall be elected at the general election on the Tuesday next following the first Monday in November, 2024. The members from Commissioner Districts 1 and 3 shall be elected at the general election on the Tuesday~~

next following the first Monday in November, 2022. All future successors to members of the board whose terms of office are to expire shall be elected at the time of the state-wide general election immediately preceding the expiration of such terms, shall take office the first day of January immediately following that election, and shall serve for terms of office of four years each. Members of the board shall serve for the terms of office specified thereof in this subsection and until their respective successors are elected and qualified.

(b) (c) All members of the board who are elected thereto shall be nominated and elected in accordance with Chapter 2 of Title 21 of the O.C.G.A., the 'Georgia Election Code.'

(e) (d) Commissioner Districts 1 through 4, as they exist immediately prior to January 1, 2023, shall continue to be designated as Commissioner Districts 1 through 4, respectively; ~~however, but as newly described under this Act, and on and after January 1, 2023, such members of the board serving from these former Commissioner Districts 2 and 4 1-4 shall be deemed to be serving from and representing their respective districts as newly described under this section.~~ as described in Section 2(b) and Appendix A."

3. Pursuant to Article 9, Section 2, Paragraph I(g), of the Georgia Constitution, the amendments to Cobb County's Local Legislation are enacted by the Cobb County Board of Commissioners pursuant to its constitutional home rule authority under Article 9, Section 2, Paragraph I (b)(2) of the Georgia Constitution and shall become legally effective upon the filing with the Georgia Secretary of State of a copy of the amendment, a copy of the required notice of publication, and an affidavit of a duly authorized representative of the newspaper attesting to such publication.

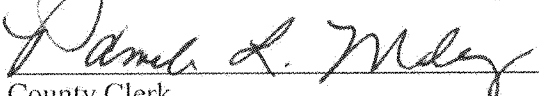
4. All local laws and parts of laws in conflict with this Act are repealed.

Adopted by the Cobb County Board of Commissioners this 25 day of October 2022.

Board Chair


ATTEST:

  
County Clerk

APPENDIX A

User: HD038

Plan Name: CobbCC-HD038-Draft3-2021

Plan Type: Local

District 001

County Cobb GA

VTD Acworth 1A

VTD Acworth 1B

VTD Acworth 1C

VTD Baker 01

VTD Big Shanty 01

Block 030258:

1009 1010 2004 2007 2008 2026

VTD Cheatham Hill 02

VTD Cheatham Hill 03

VTD Dobbins 01

Block 031007:

4007 4008

VTD Dowell 01

VTD Durham 01

VTD Fair Oaks 02

Block 030908:

2000

VTD Fair Oaks 04

Block 031006:

1000 1001

Block 031007:

1008 1010 1011 3004 4005 4009 4010 4013 4014 4015 4016

VTD Ford 01

VTD Frey 01

VTD Harrison 01

VTD Hayes 01

VTD Kemp 01

VTD Kemp 02

VTD Kemp 03

VTD Kennesaw 1A

Block 030255:

3008

Block 030258:

1000 1001 1002 1003 1004 1005 1006 1007 1008 1011 2000 2001  
2002 2003 2005 2006 2009 2025

Block 030275:

2007

Block 030278:

1003 1004 1005 1006 1015 1016 1017 1020 1022 2000 2001 2002  
2003 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017  
2020 3022 3037 3038

VTD Kennesaw 2A

VTD Kennesaw 3A

Block 030243:

3003 3006

Block 030246:

1000 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012  
1013 1014 1015 1016 1017 1018 1019 1020 1021 1022

Block 030249:

1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
1012 1013 1014 2000 3000 3001 3002 3003 3005 3007 3008 3010

Block 030255:

1004 1006 1008 1009 1010 1011 1012 1015 2005 2006 2007 3007

Block 030256:

2009 2010

Block 030257:

3000 3001 3002 3003 3004 3005 3006 3007 3008 3010 3011 3012  
3014 3019

Block 030258:

2010 2011 2018 2019 2020 2021 2023 2027

Block 030259:

1010 2000 2004

Block 030274:

3007 3008

Block 030278:

3039

VTD Kennesaw 4A

VTD Kennesaw 5A

VTD Lost Mountain 01

VTD Lost Mountain 02

VTD Lost Mountain 03

VTD Lost Mountain 04

VTD Macland 01

Block 031506:

3000 3005

Block 031510:

1000 2000

VTD Marietta 1A

Block 030910:

1009 1010 2011 2012 2016

VTD Marietta 2A

VTD Marietta 2B

VTD Marietta 3A

Block 030602:

1022

Block 030907:

2000 2001 2002 2003 2004 2005 2006 2007 2008

Block 030910:

1000 1001 1002 1003 1004 1005 1007 2004 2005 2006 2007 2010  
2015

Block 031007:

1001 1003 1004 1006 1009 3000

VTD Marietta 4C

VTD Mars Hill 01

VTD Mars Hill 02

VTD McClure 01

VTD McEachern

Block 031515:

1000

VTD North Cobb 01

VTD Oregon 01

VTD Oregon 03

Block 030906:

1005 2003 2004 2009 2010 3000 3002 3003 3006 3007

Block 030907:

1008 1009 3003 3008 3009

Block 030909:

1000 2000 2001 2002 2004 2005 2006 2007 2008 2009 2010

Block 030910:

1006 1008 1011 2008 2009 2013 2014

Block 030911:

1004 1007 1011 1012 1013 1014 2002 2003 2004 2005 2006 2007

2011 2012 2013 2014 2015

Block 031007:

1000 1002 1005 1007 3001 3002 3003 3005 3006 3007

VTD Oregon 04

Block 031517:

1000 1002 1006 1009

Block 031518:

1000 1001 1011 1012

VTD Oregon 05

VTD Pine Mountain 01

VTD Pine Mountain 02

VTD Vaughan 01

VTD Wade Green 02

District 002



County Cobb GA

VTD Chattahoochee 01

VTD Chestnut Ridge 01

VTD Dickerson 01

VTD Dobbins 01

Block 030344:

2000 2001 2002 2003 2005 2007 2008 2009 2010 2011 2012 2013  
2014 2015 2016 2017

Block 030345:

1000 1001 1002 1004 1007 1008 1010 1011 2000 2001 2002 2003  
2004 2005 2006 2007 2008 2009 2010 2011 2016 2017 2018 2021  
2022

Block 030413:

1002

Block 030414:

1005 1019 1020 1021 1022 1023 1024 1025 2002 2003 2004 2005  
2006 2007 2008 2009

Block 031001:

2058

Block 031121:

2001 2002 2003 2006 2013

Block 031122:

1006 1010 1012 1014 1015 1018 1020 2013 2021 2023 2025 2026  
2027 2028 2031 2034 2038 2039 2041 2042 2048

Block 031217:

1001 1002 1003 1004

VTD Dodgen 01

VTD Eastside 01

VTD Eastside 02

VTD Fullers Park 01

VTD Hightower 01

VTD Lindley 01

Block 031215:

1010

Block 031221:

1024

Block 031314:

1000

Block 031315:

1008

VTD Mount Bethel 01

VTD Mount Bethel 03

VTD Mount Bethel 04

VTD Murdock 01

VTD Nickajaek 01

Block 031213:

1009 1010 2013

Block 031214:

1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1011 1012

1013 1014 1015 1022 1023 2001 2002 2003 2004 2005 2006

Block 031215:

1000 1001 1002 1005 2000 2002 2003 2004 2005 2006 2009 2010

2011 2012 2016 2017 3011 3012 3013 3014 3015 3016 3017 3018

3019 3020 3022 4002 4003 4004 4005 4006 4007 4008 4009 4010

4011 4012

Block 031220:

1003

VTD Oakdale 01

VTD Powers Ferry 01

Block 030405:

5011

Block 030407:

2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012

2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024

3000 3001 3002 3003 3004 3005 3006 3007 3008 3009 3010 3011

3012 3013 3014 3015

Block 030408:

2006 2007

VTD Roswell 01

VTD Roswell 02

VTD Sewell Mill 01

VTD Sewell Mill 03

Block 030409:

1007 1008 1009 1010 1011 1012 1013 1014 1015 1020 1021 1022

1023

Block 030410:

1000 1001 1002 1003 1006 2000 2001 2002 2003 2004 2005 2006

2007 2008 2009

VTD Smyrna 1A

VTD Smyrna 2A

VTD Smyrna 3A

Block 031001:

2059 2060

Block 031101:

2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011  
2012 2013 2014 2015 2016 2017 3000 3001 3002 3003 3004 3005  
3006 3007 3008 5006 5007

Block 031110:

1000 1001 1002 1003 1004 1012 1013 1014 1015 1016 1017 1018  
1019 1020 1021 1022 1023 1024 1025 2001 2002 2003 2004 2005  
2006 2007 2008 2012 2013 2014 2015 2016 2017 2018 2019 2020  
2021 2022 2023 2024 2025 2026 2027 2028 2029 2030 2031 2032  
2033

Block 031111:

1013 1014 1021 1022 1023 1024 1025 3009

Block 031112:

1015 1016

Block 031115:

3000 3028 3029

Block 031117:

1000 1001 1002 1003 4000 4004 4005

Block 031118:

1000 1001 1004 1008 1010 1011 1012 1013 1014 1015 1016 1020  
2000 2001 2004 2005 2007 2016

Block 031121:

2005 2007 2008 2010 2012

Block 031122:

1001 1002 1003 1004 1005 1007 1008 1009 1011 1013 1016 1017

1021 1022 2001 2005 2007 2011 2012 2014 2019 2020 2022 2024  
2029 2030 2032 2033 2035 2036 2037 2040 2043 2044 2045 2046  
2047 2049 2050 3000 3001 3002 3003 3004 3005 3006 3007 3008  
3009 3010 3011 3012 3013 3014 3015 3016 3017 3018 3019 3020  
3021 3022

VTD Smyrna 5A

VTD Smyrna 6A

VTD Smyrna 7A

Block 031118:

3015 3016

Block 031215:

1003 1004 1006 1007 1008 1009 1011 2001 2007 2008 2013 2014  
2015

Block 031220:

1000 1002 1004 3025

Block 031221:

1000 1001 1002 1003 1005 1006 1007 1009 1010 1011 1012 1013  
1014 1015 1016 1017 1020 1021 1022 1023 2000 2001 2002 2004  
2006 2007 2010 2011 2012 2014 2015 3002 3003 3006 3008 3009  
3010 3011 3012 3013 3014

Block 031314:

1001 3004 3006 3007

Block 031315:

1000 1001 1002 1003 1004 1005 1006 1009 1010 3000 3008

VTD Sope Creek 01

VTD Sope Creek 02

VTD Sope Creek 03

VTD Terrell Mill 01

Block 030405:

1000 1010 1011 1012 1013 5013

Block 030408:

1000 1001 1002 1003 1004 1005 1006 2000 2001 2002 2003 2004  
2005 2008 2009

Block 030413:

1000 1003 1004 2002 2003 2004 2005 2006 2007 2008 2009 3000  
3001 3002 3003 3004 3006 3008

VTD Timber Ridge 01

VTD Vinings 01

VTD Vinings 02

VTD Vinings 03

VTD Vinings 04

District 003

County Cobb GA

VTD Addison 01

VTD Bells Ferry 02

VTD Bells Ferry 03

VTD Big Shanty 01

Block 030255:

3009

Block 030256:

2000 2001 2002 2004 2007

Block 030257:

1000 1001 1008 2004 2005 2006 2007 2008 2009 2010 2012 2013

Block 030275:

2006

Block 030278:

1000 1001 1002 1007 1008 1009 1010 1011 1012 1013 1018 1019  
1021 1023 2004 2005 2006 2018 2019 3000 3001 3002 3003 3004  
3005 3006 3007 3008 3009 3010 3011 3012 3013 3014 3015 3016  
3017 3018 3019 3020 3021 3023 3024 3025 3026 3027 3028 3029  
3030 3031 3032 3033 3034 3036 3046 3049 3050 3051 3052 3053  
3054 3055 3056 3057 3058 3059 3060 3061 3062 3063 3064

Block 030603:

3000 3001

VTD Big Shanty 02

VTD Blackwell 01

VTD Chalker 01

VTD Davis 01

VTD Dobbins 01

Block 030412:

3002 3003 3007 3008 3009 3010 3011 3013 3014

Block 030414:

1009 1013 1014

Block 030800:

2025 2026 2038 2039 2043 2044 2045 2046 2048 2049 2050 2051  
2052 3048 3051 3052

Block 030912:

4040 4041 4042

Block 031001:

1000 1001 1019 1020 1021 1022 1023 1024 1025 1026 1028 2000

2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012  
2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024  
2025 2026 2027 2028 2029 2030 2031 2034 2035 2036 2037 2038  
2040 2041 2042 2043 2044 2045 2046 2047 2054 2055 2056 2057  
2061 2063 3000 3001 3002 3003 3004 3005 3006 3007 3008 3009  
3010 3011 3012 3013 3014 3015 3016 3017 3018 3019 3020 3021  
3022 3023 3025 3026 3028

Block 031122:

2000 2002 2003 2004 2006 2008 2016

VTD East Piedmont 01

VTD Elizabeth 01

VTD Elizabeth 02

VTD Elizabeth 03

VTD Elizabeth 04

VTD Elizabeth 05

VTD Fair Oaks 04

Block 031007:

4004 4006 4011

VTD Garrison Mill 01

VTD Gritters 01

VTD Kell 01

VTD Kennesaw 1A

Block 030247:

1000

Block 030275:

2002 2003 2005

VTD Kennesaw 3A



Block 030256:

2003 2005 2006

Block 030257:

1002 1003 1004 1005 1006 1007 2000 2001 2002 2003 2011 2014  
2015

Block 030278:

1014 3035 3041 3042 3045 3047 3048

VTD Lassiter 01

VTD Mabry 01

VTD Marietta 1A

Block 030411:

2005 2010

Block 030412:

1000 1001 1002 1003 1004 1005 1006 2000 2001 2002 2003 2004  
2005 2006 3000 3001 3004 3005 3006 3012 3015 3016 3017

Block 030414:

1007 1008 1010 1011 1012 1015 1016

Block 030700:

3039 3040 3041 3042 3047 4003 4004 4007 4008 4031 4032 4033  
4034 4035

Block 030800:

1003 1005 1006 1007 1008 1009 1010 1011 1012 1013 1014 1015  
1016 1017 1018 1019 1020 1021 1022 1023 1024 1025 1026 1027  
1028 1029 1030 1031 1032 1033 1034 1035 1038 1039 2000 2001  
2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013  
2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2027  
2028 2029 2030 2031 2032 2033 2034 2035 2036 2037 2040 2041

2042 2047 3000 3001 3002 3003 3004 3008 3013 3014 3015 3016  
3017 3021 3022 3023 3024 3025 3026 3027 3028 3029 3030 3031  
3032 3033 3035 3036 3037 3038 3039 3040 3041 3042 3043 3044  
3045 3046 3047 3049 3050

Block 030912:

1004 2001 2004 2005 2015 2016 4024 4025 4026 4029 4030 4031  
4032 4033 4034 4035 4036 4044

Block 031001:

2048 2049 2050 2051

VTD Marietta 3A

Block 030602:

2020 2021 4030 4031 4032 4036 4037 4038 4039 4040 4041 4042  
4043 4047 4060 4061 5002 5003 5004 5005 5006 5008 5009 5012  
5013 5014 5015 5016 5017 5018 5019 5020 5021 5022 5023 5024  
5025

Block 030700:

2020 2021 2022 2023 2026 2028 2029 2030 2031

Block 030912:

3001 3002 3003 3004 3006 3007 3008 3009 3010 3011 3012 4006  
4009 4010 5000 5001 5002 5003 5004 5005 5006 5007 5008 5009  
5010 5011 5012 5013 5014 5015 5016

VTD Marietta 4A

VTD Marietta 4B

VTD Marietta 5A

VTD Marietta 5B

VTD Marietta 6A

VTD Marietta 6B

VTD Marietta 7A

VTD McCleskey 01

VTD Nicholson 01

VTD Oregon 03

Block 030912:

1000 1001 1002 1003 1005 1006 2000 2002 2003 2006 2007 2008  
2009 2010 2011 2012 2013 2014 2017 2018 2019 4037 4038 4039  
4043

Block 031001:

1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012 1013  
1014 1015 1016 1017 1018 1027 2032

Block 031007:

4000 4001 4002 4003 4012

VTD Palmer 01

VTD Pitner 01

VTD Pope 01

VTD Post Oak 01

VTD Powers Ferry 01

Block 030405:

2001 3001 3003 3004 3005 3006 3007 3010 3012 3013 3014 4003  
4004 4008 4009 4010 4011 4014 4015 4016 4019 4034 5000 5001  
5002 5003 5004 5005 5006 5007 5008 5012 5021

Block 030410:

3007 3009 3010 3011

VTD Rocky Mount 01

VTD Sandy Plains 01

VTD Sewell Mill 03

Block 030410:

3008

Block 030505:

1000 1001 1002 1003 1004 1005 2000 2001 2002 2003 2004 2005  
2006 2012 3004 3006 3007 3008 3009 3010 3011 4009 4010 4011  
4012 4026 4027 4029

Block 030510:

1009

VTD Shallowford Falls 01

VTD Simpson 01

VTD Smyrna 3A

Block 031122:

2015

VTD Terrell Mill 01

Block 030405:

1005 1006 5014 5015 5017 5018

VTD Willco 01

District 004

County Cobb GA

VTD Austell 1A

VTD Birney 01

VTD Birney 02

VTD Bryant 01

VTD Bryant 02

VTD Clarkdale 01

VTD Clarkdale 02

VTD Cooper 01

VTD Dobbins 01

Block 031006:

2000 2009

VTD Fair Oaks 02

Block 030908:

1000 1001 1002 1003 1004 1005 2001 2002 2003 2004 2005 2006

2007 2008 2009 3000 3001 3002 3003 3004 3005

Block 030909:

1012 1013

Block 031005:

1000 1001 1002 1003 1004 1005 1006 2000 2001 2002 2003 2004

2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016

2017 2018 2019 2020 2021 3000 3001 3002 3003 3004 3005 3006

4000 4001 4002 4003 4004 4005 4006 4007 4008 4009 4010 4011

4012 4013 4014 4015

Block 031006:

1011

VTD Fair Oaks 04

Block 031004:

1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011

1012 1013 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009

2010 2011 2012 3003 3004 3005 3006 3008 3009 3010 3011 3012

3013 3014 3015 3016 3017 3018 3019 3020 3021 3022 3023 3024

3025 3026 3027 3028 4000 4001 4002 4003 4004 4005 4006 4007

4008 4009 4010 4011 4012 4013 4014 4015 4016 4017 4018 4019

4020 4021

Block 031006:

1002 1003 1004 1005 1006 1007 1012 1013 2001 2002 2003 2004  
2005 2006 2007 2008 2010 2011 2012 2013 2014 2017 2018

VTD Harmony-Leland 01

VTD Lindley 01

Block 031214:

1016 1017 1018 1019 1020 1024 1025 1026 1027 1028

Block 031314:

1002 1003 1004 1005 1006 1007 1008 1010 1011 1012 1013 1014  
1015 1016 1017 1018 1019 1020 2000 2001 2002 2004 2005 2006  
2007 2008 2010 2012 2013 2014 2016 2017 2018 2019 2020 2022  
2024 2025 2026 2027 2028 2029 2030 2034 2035 2037 2039 2040  
2041 3000 3001 3002 3003 3005 3008 3009 3010 3011 3012 3013  
3014 3015 3016 3017 3018 3019 3020

Block 031315:

1011 2000 2001 2002 2003 2004 2005 2006 2007 3006 3007 3009  
3010 3013

VTD Mableton 01

VTD Mableton 02

VTD Mableton 03

VTD Mableton 04

VTD Macland 01

Block 031506:

3001 3002 3003 3004 3006 4000 4001 4002

Block 031510:

1001 1002 1003 1004 1005 1006 1007 1008 1009 2001 2002 2003  
2004 2005 2007 2008 2009 2011

VTD McEachern

Block 031506:

1000 1001 5001

Block 031507:

1007 1011 1012 1014

Block 031511:

2009 2011

Block 031513:

3003

Block 031514:

1000 1001 1002 1003 1004 1007 2002 2006

Block 031515:

1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012

1013 1014 1018 2000 2001 2002 2003 2004 2005 2007 2008 2010

2011 2012 2014 2016 2018 2023 2026

Block 031516:

1000 1003 1005 2000 2001 2002 2003 2004

VTD Nickajack 01

Block 031214:

1010 1021

VTD Norton Park 01

VTD Oregon 02

VTD Oregon 03

Block 030909:

1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 3000

Block 031006:

1008 1009 1010

Block 031007:

2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011

VTD Oregon 04

Block 031507:

2006

Block 031517:

1001 1003 1004 1005 1007 1008 2000 2001 2002 2003 2004 2005

2006 2007 2008 2009 2010

Block 031518:

1002 1003 1004 1005 1006 1007 1008 1009 1010 1013 1014 2000

2001 2002 2003 2004 2005 2006 2007 2008 2009

VTD Pebblebrook 01

VTD Powder Springs 1A

VTD Powder Springs 2a

VTD Powder Springs 3A

VTD Riverside 01

VTD Smyrna 3A

Block 031115:

3001 3002 3004 3005 3006 3008 3009

VTD Smyrna 4A

VTD Smyrna 7A

Block 031221:

1019

Block 031314:

1009 2003 2009 2011 2015 2021 2023 2031 2032 2033 2036 2038

Block 031315:

1007 3002



Block 031324:

1001 1002 1010 1011

Block 031325:

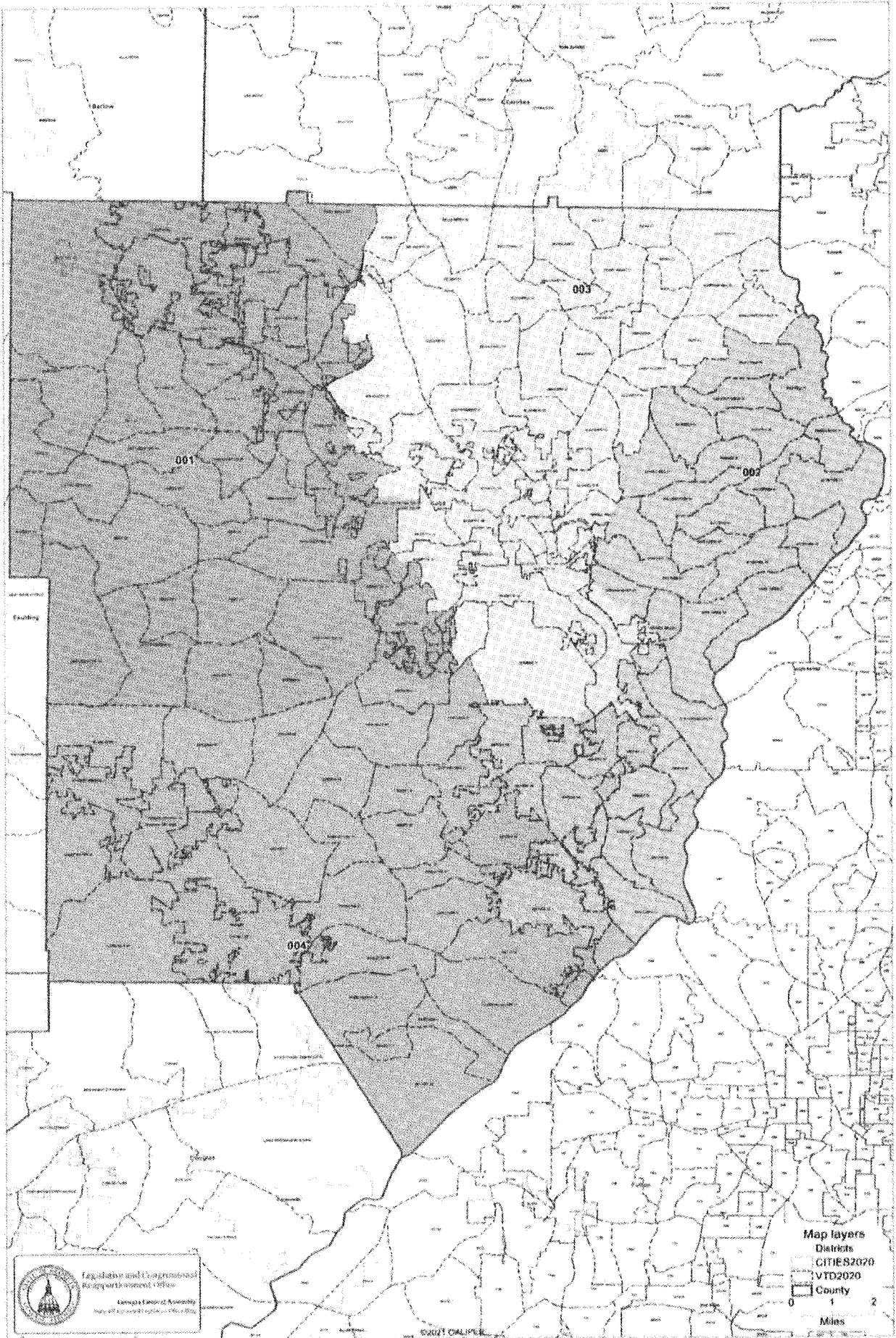
2000 2010 2012 2013 2014 2015 2017 2018

VTD Sweetwater 01

VTD Sweetwater 02

# Draft - Cobb County Commission Districts

State: GA  
Folio: 10000  
Type: Local



APPENDIX B

User: HD046

Plan Name: CobbCC-HD046-2022

Plan Type: Local

District 001

County Cobb GA

VTD Acworth 1A

VTD Acworth 1B

VTD Acworth 1C

VTD Baker 01

VTD Big Shanty 01

VTD Cheatham Hill 02

VTD Cheatham Hill 03

VTD Dowell 01

VTD Durham 01

VTD Elizabeth 01

Block 030602:

2000 2001 2002

VTD Fair Oaks 02

Block 030908:

2000

VTD Ford 01

VTD Frey 01

VTD Harrison 01

VTD Hayes 01

VTD Kemp 01

VTD Kemp 02

VTD Kemp 03

VTD Kennesaw 1A

Block 030255:

3008

Block 030258:

1000 1001 1002 1003 1004 1005 1006 1007 1008 1011 2000 2001  
2002 2003 2005 2006 2009 2025

Block 030275:

2007

Block 030278:

1003 1004 1005 1006 1015 1016 1017 1020 1022 2000 2001 2002  
2003 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017  
2020 3022 3037 3038

VTD Kennesaw 2A

VTD Kennesaw 3A

VTD Kennesaw 4A

VTD Kennesaw 5A

VTD Lost Mountain 01

VTD Lost Mountain 02

VTD Lost Mountain 03

VTD Lost Mountain 04

VTD Macland 01

Block 031506:

3000 3005

Block 031510:

1000 2000

VTD Marietta 2A

VTD Marietta 2B

Block 030906:

1000 1001 1002 1003 1004 2000 2001 2002 2006 2007 2008 2011  
2012 2013 2015 3004 3005

Block 030907:

1010

Block 030910:

2000

Block 030911:

1000 2000

Block 030912:

3005 3013 3014 3015 3016

VTD Marietta 3A

Block 030602:

1022 2020 2021 4030 4031 4032 4060 4061 5002 5003 5004 5005  
5006 5008 5009 5012 5013 5014 5015 5016 5017 5018 5019 5020  
5021 5022 5023 5024 5025

Block 030907:

2000 2001 2002 2003 2004 2005 2006 2007 2008

Block 030910:

1000

Block 030912:

3001 3002 3003 3004 3006 3007 3008 3009 3010 3011 3012 4006  
4009 4010 5000 5001 5002 5003 5004 5005 5006 5007 5008 5009  
5010 5011 5012 5013 5014 5015 5016

VTD Marietta 4A

Block 030602:

2003 2004 2005 2015 2016 2017 2022 4016 4017 4018 4019 4020  
4021 4023 4024 4025 4026 4027 4028 4029 4033 4034 4035 5000  
5001 5007 5010 5011

VTD Marietta 4C

VTD Marietta 5A

Block 030602:

4062 4063

Block 030912:

3000 4004 4005 4007 4008 4011 4012 4013 4014 4015 4028

VTD Mars Hill 01

VTD Mars Hill 02

VTD McClure 01

VTD McEachern

Block 031515:

1000

VTD North Cobb 01

VTD Oregon 01

VTD Oregon 03

Block 030906:

1005 2003 2004 2009 2010 3000 3002 3003 3006 3007

Block 030907:

1008 1009 3003 3008 3009

Block 030909:

1000 2001

Block 030911:

2006

VTD Oregon 04

Block 031517:

1000 1002 1006 1009

Block 031518:

1000 1001 1011 1012

VTD Oregon 05

VTD Pine Mountain 01

VTD Pine Mountain 02

VTD Vaughan 01

VTD Wade Green 02

District 002

County Cobb GA

VTD Chalker 01

Block 030247:

1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012

2000 2001 2002 2003 3000 3001 3002 3003 3004 3005 3007 3008

3009 3010 3011 3012

Block 030248:

1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011

1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023

1024 1025 1026 1027 1028 1029 1030 1031 1032 1033 1034 1035

2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016

Block 030604:

2010 2011 2012

VTD Chattahoochee 01

VTD Dobbins 01

VTD East Piedmont 01

VTD Elizabeth 01

Block 030506:

2008 2011 2014 3009 3010 3026 3035 3037 3038 3039 3041 3043

Block 030602:

3000 3001 3003 3004 3005 3006 3007 3008 3009 3011 3014 4000  
4003 4004 4007

Block 030603:

1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
1012 2000 2001 2002 2003 2004 2005 2008 2010 2011 2019 2020  
2021 2022 2023 2024 2025 2026 2029 2031 2032 2033 2034 2035  
2036 2037 2038 2039 2040 2045 2047 2048 3002 3003 3004 3005  
3006 3007 3008 3009 3010 3011 3012 3013 3014

VTD Elizabeth 02

Block 030506:

3014 3015 3016 3022

Block 030508:

1006 1007 1037 1038 1039 1040 1041 1042 1043

VTD Elizabeth 04

Block 030506:

3020 3021 3046 3047 3056 3058

Block 030508:

1003 1012 1019 1020 1022 1023 1024 1026 1027 1028 1029 1030  
1031 1049 1050

Block 030509:

2011



Block 030511:

2005 2008 2009 2010 2011 2012 2014 2015 2027 3000 3001 3002  
3003 3004 3005 3007 3010

VTD Fair Oaks 02

Block 030908:

2001 2002 2003 2004 2005 2006 2007 2008 2009

Block 030909:

1012

Block 031005:

2000 2001 2002 2003 2004 4000 4001 4002 4003 4004 4005 4006  
4007 4008 4014 4015

Block 031006:

1011

VTD Fair Oaks 04

Block 031004:

3003 3004 3005 3006 3008 3009 3010 3011 3012 3013 3014 3021  
3028 4000 4001 4002 4003 4004 4005 4006 4007 4008 4009 4010  
4011 4012 4013 4014 4015 4016 4017 4018 4019 4020 4021

Block 031006:

1000 1001 1002 1003 1004 1005 1006 1007 1012 1013 2001 2002  
2003 2004 2005 2006 2007 2008 2010 2011 2012 2013 2014 2017  
2018

Block 031007:

1008 1010 1011 3004 4004 4005 4006 4009 4010 4011 4013 4014  
4015 4016

VTD Kennesaw 1A

Block 030247:

1000

VTD Marietta 1A

VTD Marietta 2B

Block 030909:

2003

Block 030910:

2001 2002 2003

Block 030911:

1001 1002 1003 1005 1006 1008 1009 1010 2001 2008 2009 2010

2016 2017 2018

VTD Marietta 3A

Block 030602:

4036 4037 4038 4039 4040 4041 4042 4043 4047

Block 030700:

2020 2021 2022 2023 2026 2028 2029 2030 2031

Block 030910:

1001 1002 1003 1004 1005 1007 2004 2005 2006 2007 2010 2015

Block 031007:

1001 1003 1004 1006 1009 3000

VTD Marietta 4A

Block 030602:

2006 4002 4014 4015 4022

VTD Marietta 4B

VTD Marietta 5A

Block 030505:

1013 1014 1015 1016 1017 3003 3005 3012 3013 3014 3015 4007

4008 4025 4028

Block 030602:

4044 4045 4046 4048 4049 4050 4051 4052 4053 4054 4055 4056  
4057 4058 4059

Block 030700:

1022 1023 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015  
2016 2017 2018 2019 2024 2025 2027 3000 3001 3002 3003 3004  
3005 3006 3007 3008 3009 3010 3011 3012 3013 3014 3015 3016  
3017 3018 3019 3020 3021 3022 3023 3024 3025 3026 3027 3028  
3029 3030 3031 3032 3033 3034 3035 3036 3037 3038 3043 3044  
3045 3046 3048 3049 3050 3051 3052 3053 4005 4006 4009 4010  
4011 4012 4013 4014 4015 4016 4017 4018 4019 4020 4021 4022  
4023 4024 4025 4026 4027 4028 4029 4030 4036

Block 030800:

3005 3006 3007 3009 3010 3011 3012 3018 3019 3020 3034

Block 030912:

4000 4001 4002 4003 4016 4017 4018 4019 4020 4021 4022 4023  
4027

VTD Marietta 5B

VTD Marietta 6A

Block 030405:

1001 1002 1004 1007 2000 2002 2003 2004 2005 3000 3002 3008  
3009 3011 3015 4035 5009 5010 5016 5019 5020

Block 030505:

1006 1007 1008 1009 1010 1011 1012 2007 2008 2009 2010 2011  
3000 3001 3002

Block 030508:

1025

Block 030511:

1000 1001 1002 1003 2007 2013 2018 2019 2020 2021 2022 2023  
2024 2025 2026

VTD Marietta 6B

Block 030506:

3017 3018 3019 3045 3052 3053 3054 3055 3057 3059

Block 030508:

1000 1001 1002 1004 1005 1008 1009 1010 1011 1013 1014 1015  
1016 1017 1018 1033 1034 1051

Block 030511:

2000 2001 2002 2003 2004 2006 2016 2017 3006 3008 3009 3011

VTD Marietta 7A

VTD Nickajack 01

Block 031213:

1009 1010 2013

Block 031214:

1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
1012 1013 1014 1015 1021 1022 1023 2001 2002 2003 2004 2005  
2006

Block 031215:

1000 1001 1002 1005 2000 2002 2003 2004 2005 2006 2009 2010  
2011 2012 2016 2017 3011 3012 3013 3014 3015 3016 3017 3018  
3019 3020 3022 4002 4003 4004 4005 4006 4007 4008 4009 4010  
4011 4012

VTD Oakdale 01

Block 031112:

2005 2006

Block 031209:

2000 2001 2003 2004 2006 2007 2008 2009 2010 2011 3001 3002  
3003 3004 3005 3007 3008 3009 3011 3012 3013 3014 3015 3016  
3017 3018 3019 3022 3023

Block 031215:

3010

VTD Oregon 03

Block 030909:

1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 2000  
2002 2004 2005 2006 2007 2008 2009 2010 3000

Block 030910:

1006 1008 1011 2008 2009 2013 2014

Block 030911:

1004 1007 1011 1012 1013 1014 2002 2003 2004 2005 2007 2011  
2012 2013 2014 2015

Block 030912:

1000 1001 1002 1003 1005 1006 2000 2002 2003 2006 2007 2008  
2009 2010 2011 2012 2013 2014 2017 2018 2019 4037 4038 4039  
4043

Block 031001:

1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012 1013  
1014 1015 1016 1017 1018 1027 2032

Block 031006:

1008 1009 1010

Block 031007:

1000 1002 1005 1007 2000 2001 2002 2003 2004 2005 2006 2007  
2008 2009 2010 2011 3001 3002 3003 3005 3006 3007 4000 4001

4002 4003 4012

VTD Powers Ferry 01

Block 030405:

2001 3001 3003 3004 3005 3006 3007 3010 3012 3013 3014 4003  
4004 4008 4009 4010 4011 4014 4015 4016 4019 4034 5000 5001  
5002 5003 5004 5005 5006 5007 5008 5011 5012 5021

Block 030410:

3007 3009 3010 3011

VTD Sewell Mill 03

Block 030410:

3008

Block 030505:

1000 1001 1002 1003 1004 1005 2000 2001 2002 2003 2004 2005  
2006 2012 3004 3006 3007 3008 3009 3010 3011 4009 4010 4011  
4012 4026 4027 4029

VTD Smyrna 1A

VTD Smyrna 2A

VTD Smyrna 3A

Block 031001:

2059 2060

Block 031101:

2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011  
2012 2013 2014 2015 2016 2017 3000 3001 3002 3003 3004 3005  
3006 3007 3008 5006 5007

Block 031110:

1000 1001 1002 1003 1004 1012 1013 1014 1015 1016 1017 1018  
1019 1020 1021 1022 1023 1024 1025 2001 2002 2003 2004 2005

2006 2007 2008 2012 2013 2014 2015 2016 2017 2018 2019 2020  
2021 2022 2023 2024 2025 2026 2027 2028 2029 2030 2031 2032  
2033

Block 031111:

1013 1014 1021 1022 1023 1024 1025 3009

Block 031112:

1015 1016

Block 031115:

3000

Block 031118:

1000 1011 1012 2000 2007

Block 031121:

2005 2007 2008 2010 2012

Block 031122:

1001 1002 1003 1004 1005 1007 1008 1009 1011 1013 1016 1017  
1021 1022 2001 2005 2007 2011 2012 2014 2015 2019 2020 2022  
2024 2029 2030 2032 2033 2035 2036 2037 2040 2043 2044 2045  
2046 2047 2049 2050 3000 3001 3002 3003 3004 3005 3006 3007  
3008 3009 3010 3011 3012 3013 3014 3015 3016 3017 3018 3019  
3020 3021 3022

VTD Smyrna 4A

Block 031220:

3000

VTD Smyrna 5A

Block 031001:

2033 2039 3024 3027 3029

Block 031004:

3000 3001 3002 3007

Block 031006:

2015 2016

Block 031101:

1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
1012 1013 1014 1015 1016 4000 4001 4002 4003 4004 4005 4006  
4007 4008 4009 4010 4011 4012 4013 5000 5001 5002 5003 5004  
5005 5008 5009

Block 031110:

1005 1006 1007 1008 1009 1010 1011

Block 031116:

1000 1002 4000 4001 4002 4003

Block 031122:

2009 2010 2017 2018

VTD Smyrna 6A

Block 031110:

2000 2009 2010 2011

Block 031111:

3000 3001 3002 3003 3004 3005 3006 3007 3008

Block 031112:

1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011  
1012 1013 1014 2000 2001 2002 2003 2004 2007 2008 2009 2010  
2011 2012 2013 2014 2015 3000 3001 3002 3003 3004 3005 3006  
3007 3008 3009 3010 3011 3012 3013 4000 4001 4002 4003 4004  
4005 4006 4007 4008 4009 4010

Block 031118:

3000



Block 031209:

2002 2005 2012 2013 3000 3006 3010 3020 3021

Block 031215:

3021 3023

Block 031220:

2000 3002 3008 3011 3012

VTD Smyrna 7A

Block 031215:

1003 1004 1006 1011 2001 2007 2008 2013 2014 2015

Block 031221:

2000 2014 2015 3013

VTD Sope Creek 02

Block 030353:

1005 3015

VTD Terrell Mill 01

Block 030405:

1000 1005 1006 1010 1011 1012 1013 5013 5014 5015 5017 5018

Block 030413:

1000 1003 1004 2002 2003 2004 2005 2006 2007 2008 2009 3000

3001 3002 3003 3004 3006 3008

VTD Vinings 01

VTD Vinings 02

VTD Vinings 03

VTD Vinings 04

District 003

County Cobb GA

VTD Addison 01

VTD Bells Ferry 02

VTD Bells Ferry 03

VTD Big Shanty 02

VTD Blackwell 01

VTD Chalker 01

Block 030247:

3006

Block 030248:

2000 2001 2002 2003 2004

VTD Chestnut Ridge 01

VTD Davis 01

VTD Dickerson 01

VTD Dodgen 01

VTD Eastside 01

VTD Eastside 02

VTD Elizabeth 02

Block 030506:

1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011

1012 1013 1014 1015 1020 1021 1022

Block 030507:

2013 3000 3001 3002 3003 3004 3005 3006 3007 3008 3009 3011

3012 3013 3014 3015 3016 3017 3018 3019 3022 3023

VTD Elizabeth 03

VTD Elizabeth 04

Block 030509:

2019 2022 2023 2024

Block 030510:

1000 1001 1002 1003 1004 1005 1006 1007

VTD Elizabeth 05

VTD Fullers Park 01

VTD Garrison Mill 01

VTD Gritters 01

VTD Hightower 01

VTD Kell 01

VTD Kennesaw 1A

Block 030275:

2002 2003 2005

VTD Lassiter 01

VTD Mabry 01

VTD Marietta 6A

Block 030405:

4000

Block 030407:

2000

Block 030410:

1004 1005 1007 1008 1009 3000 3004 3005

VTD Marietta 6B

Block 030507:

3010 3020 3021 3024 3025 3026 3027 3028 3029

Block 030509:

2007 2008 2009 2010 2012 2014 2015 2016 2017 2018 2020 2021

2025

VTD McCleskey 01

VTD Mount Bethel 01

VTD Mount Bethel 03

VTD Mount Bethel 04

VTD Murdock 01

VTD Nicholson 01

VTD Palmer 01

VTD Pitner 01

VTD Pope 01

VTD Post Oak 01

VTD Powers Ferry 01

Block 030407:

2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012

2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024

3000 3001 3002 3003 3004 3005 3006 3007 3008 3009 3010 3011

3012 3013 3014 3015

Block 030408:

2006 2007

VTD Rocky Mount 01

VTD Roswell 01

VTD Roswell 02

VTD Sandy Plains 01

VTD Sewell Mill 01

VTD Sewell Mill 03

Block 030409:

1007 1008 1009 1010 1011 1012 1013 1014 1015 1020 1021 1022

1023

Block 030410:

1000 1001 1002 1003 1006 2000 2001 2002 2003 2004 2005 2006  
2007 2008 2009

Block 030510:

1009

VTD Shallowford Falls 01

VTD Simpson 01

VTD Sope Creek 01

VTD Sope Creek 02

Block 030353:

1000 1001 1002 1003 1004 2001 2002 2003 2004 2006 2007 2008  
2009 2010 2011 2012 3000 3001 3002 3003 3004 3005 3006 3007  
3008 3009 3010 3011 3012 3013 3014

Block 030354:

2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011  
3001 3002 3005

Block 030408:

1007 1008

VTD Sope Creek 03

VTD Terrell Mill 01

Block 030408:

1000 1001 1002 1003 1004 1005 1006 2000 2001 2002 2003 2004  
2005 2008 2009

VTD Timber Ridge 01

VTD Willeo 01

District 004

County Cobb GA

VTD Austell 1A

VTD Birney 01

VTD Birney 02

VTD Bryant 01

VTD Bryant 02

VTD Clarkdale 01

VTD Clarkdale 02

VTD Cooper 01

VTD Fair Oaks 02

Block 030908:

1000 1001 1002 1003 1004 1005 3000 3001 3002 3003 3004 3005

Block 030909:

1013

Block 031005:

1000 1001 1002 1003 1004 1005 1006 2005 2006 2007 2008 2009

2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021

3000 3001 3002 3003 3004 3005 3006 4009 4010 4011 4012 4013

VTD Fair Oaks 04

Block 031004:

1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011

1012 1013 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009

2010 2011 2012 3015 3016 3017 3018 3019 3020 3022 3023 3024

3025 3026 3027

VTD Harmony-Leland 01

VTD Lindley 01

VTD Mableton 01

VTD Mableton 02

VTD Mableton 03

VTD Mableton 04

VTD Macland 01

Block 031506:

3001 3002 3003 3004 3006 4000 4001 4002

Block 031510:

1001 1002 1003 1004 1005 1006 1007 1008 1009 2001 2002 2003

2004 2005 2007 2008 2009 2011

VTD McEachern

Block 031506:

1000 1001 5001

Block 031507:

1007 1011 1012 1014

Block 031511:

2009 2011

Block 031513:

3003

Block 031514:

1000 1001 1002 1003 1004 1007 2002 2006

Block 031515:

1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012

1013 1014 1018 2000 2001 2002 2003 2004 2005 2007 2008 2010

2011 2012 2014 2016 2018 2023 2026

Block 031516:

1000 1003 1005 2000 2001 2002 2003 2004

VTD Nickajaek 01

Block 031220:

1003

VTD Norton Park 01

VTD Oakdale 01

Block 031118:

2013 2017 3003 3004 3005 3006 3008 3009 3010 3012 3014 4006  
4007

Block 031220:

1001 1005 1007 3004 3007 3014 3015 3016 3017 3018 3019 3020  
3021 3022 3024

Block 031221:

1004 1008 2003 2005 2008 2009 2013 3000 3001 3004 3005 3007  
3015 3016 3017

VTD Oregon 02

VTD Oregon 04

Block 031507:

2006

Block 031517:

1001 1003 1004 1005 1007 1008 2000 2001 2002 2003 2004 2005  
2006 2007 2008 2009 2010

Block 031518:

1002 1003 1004 1005 1006 1007 1008 1009 1010 1013 1014 2000  
2001 2002 2003 2004 2005 2006 2007 2008 2009

VTD Pebblebrook 01

VTD Powder Springs 1A

VTD Powder Springs 2a

VTD Powder Springs 3A

VTD Riverside 01



VTD Smyrna 3A

Block 031115:

3001 3002 3004 3005 3006 3008 3009 3028 3029

Block 031117:

1000 1001 1002 1003 4000 4004 4005

Block 031118:

1001 1004 1008 1010 1013 1014 1015 1016 1020 2001 2004 2005  
2016

VTD Smyrna 4A

Block 031117:

1004 1005 1006 1007 1008 1009 1010 1011 1012 1013 1014 1015  
1016 1017 1018 1019 1020 1022 1023 1024 1025 3007 4009

Block 031118:

1002 1003 1005 1006 1007 1009 1017 1018 1019 1021 1022 1023  
1024 1025 1026 1027 2002 2003 2006 2008 2009 2010 2011 2012  
2014 2015 3001 3002 3007 3011 3013 4000 4001 4002 4003 4004  
4005 4008 4009

Block 031220:

1006 3001

VTD Smyrna 5A

Block 031115:

2000 2001 2002 3020 3021 3022

Block 031116:

1001 1003 1004 1005 1006 1007 1008 1009 1013 1014 1015 1016  
1017 1018 1019 1021 2001 2011 2013 3000 3001 3002 3003 3007  
3012 3014 3015 3016 3017 3018 4004 4005 4006 4007 4008 4009  
4010

VTD Smyrna 6A

Block 031220:

2001 2002 2003 2004 3003 3005 3006 3009 3010 3013 3023

VTD Smyrna 7A

Block 031118:

3015 3016

Block 031215:

1007 1008 1009

Block 031220:

1000 1002 1004 3025

Block 031221:

1000 1001 1002 1003 1005 1006 1007 1009 1010 1011 1012 1013

1014 1015 1016 1017 1019 1020 1021 1022 1023 2001 2002 2004

2006 2007 2010 2011 2012 3002 3003 3006 3008 3009 3010 3011

3012 3014

Block 031314:

1001 1009 2003 2009 2011 2015 2021 2023 2031 2032 2033 2036

2038 3004 3006 3007

Block 031315:

1000 1001 1002 1003 1004 1005 1006 1007 1009 1010 3000 3002

3008

Block 031324:

1001 1002 1010 1011

Block 031325:

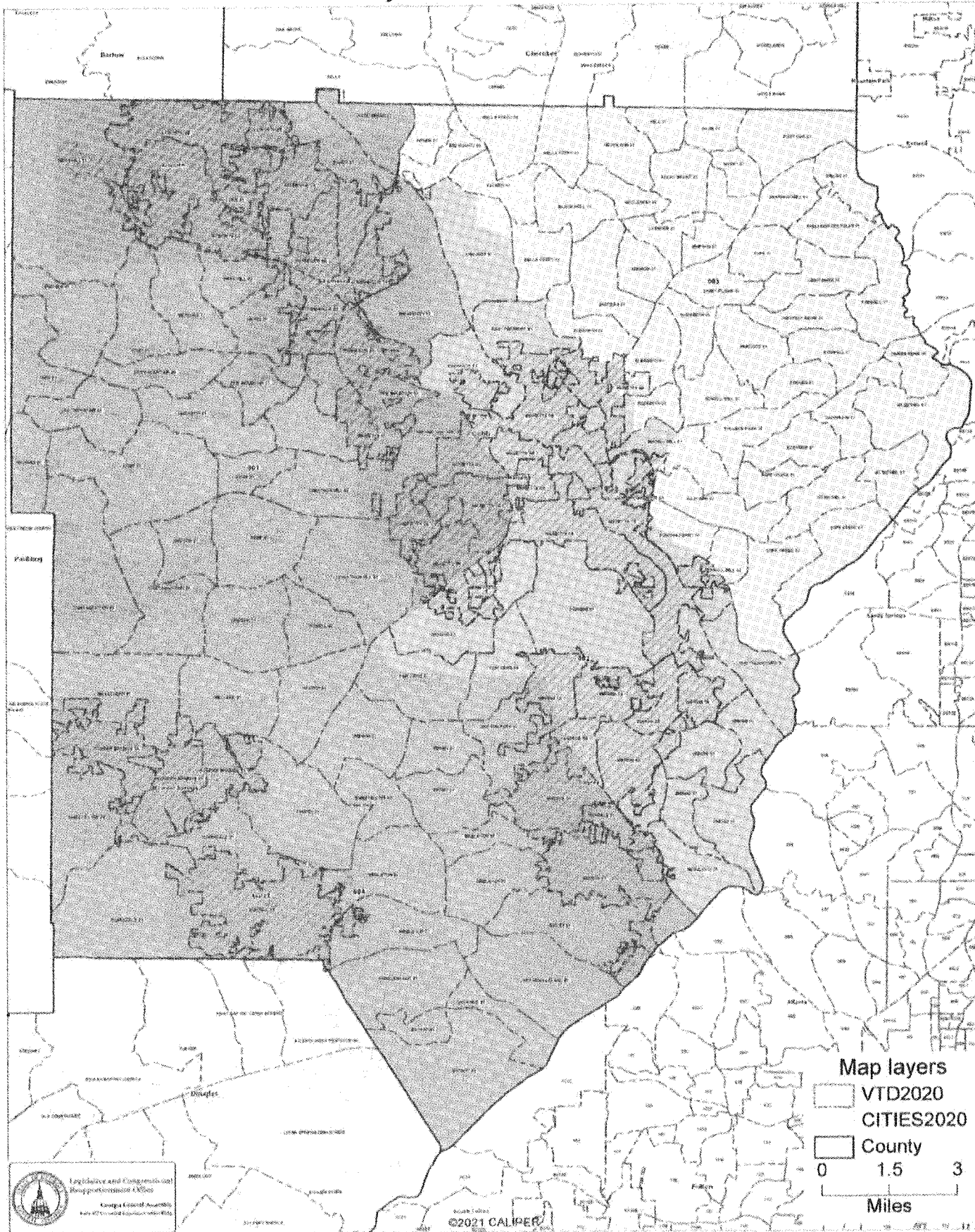
2000 2010 2012 2013 2014 2015 2017 2018

VTD Sweetwater 01

VTD Sweetwater 02

# Cobb County Commission Districts - 2022

Case# HD046  
Plan: CobbCC-HD046-2022  
Type: Local



# **EXHIBIT 4**



## The Office of Secretary of State

*Brad Raffensperger*  
SECRETARY OF STATE

*C. Ryan Germany*  
GENERAL COUNSEL

December 22, 2022

### VIA ELECTRONIC MAIL

H. William Rowling Jr.  
County Attorney, Cobb County  
100 Cherokee Street, Suite 350  
Marietta, GA 30090  
h.william.rowling@cobbcounty.org

RE: Local Act Amendment for Cobb County, Georgia

Dear Mr. Rowling:

This letter acknowledges receipt of your notification letter and required documentation regarding a Local Act Amendment that was approved by the Cobb County Board of Commissioners during its two consecutive meetings held on October 11, 2022, and October 25, 2022 (the "Amendment"). The required documentation received included a copy of the Amendment, a copy of the required notice of publication, and an affidavit of a duly authorized representative of the newspaper in which the notice was published.

A copy of your letter and the required documentation are enclosed for your reference. These documents bear a filing date of October 26, 2022, which is the date on which such documents were filed in this office. The documents have been sent to the Office of Legislative Counsel for publishing. However, you should not consider the ministerial function of filing the Amendment with our office or the publishing of the Amendment to be a comment on whether the Amendment is allowable under state law or a proper exercise of authority by the Cobb County Commission, nor should you rely on it to attempt to establish the validity of the Amendment.

In fact, it appears that the Amendment is very likely an unauthorized exercise of authority by the Cobb County Commission that does not comply with Georgia law or the Georgia Constitution. *See enclosed* October 3, 2022 letter from Office of Legislative Counsel. Proceeding with invalid district lines could subject the Cobb County Board of Elections to sanctions for putting voters in improper districts.

Sincerely,

*C. Ryan Germany*  
C. Ryan Germany

**Enclosures**

**Cc: Office of Legislative Counsel (via email)  
Cobb County Board of Elections (via email to Daniel White)**