

Exh. 25

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

L. LIN WOOD, JR.,)

Plaintiff,)

v.)

BRAD RAFFENSPERGER, in his official)
capacity as Secretary of State of the State)
of Georgia, REBECCA N. SULLIVAN,)
in her official capacity as Vice Chair of)
the Georgia State Election Board,)
DAVID J. WORLEY, in his official)
capacity as a Member of the Georgia)
State Election Board, MATTHEW)
MASHBURN, in his official capacity as)
a Member of the Georgia State Election)
Board, and ANH LE, in her official)
capacity as a Member of the Georgia)
State Election Board,)

Defendants.)

CIVIL ACTION FILE NO.
1:20-cv-04651-SDG

**AFFIDAVIT OF JUAN CARLOS COBUCCI IN SUPPORT OF PLAINTIFF'S MOTION
FOR TEMPORARY RESTRAINING ORDER**

I, JUAN CARLOS COBUCCI, declare under the penalty of perjury that the following is true and correct:

1. My name is Juan Carlos Cobucci. I am over the age of 18 and competent to testify. I have personal knowledge of the matters stated herein.

2. I was born in Carracas Venezuela in 1967 and migrated to the United States in 2015 on a business visa.
3. In 1979 my family started a company called Panavideo Instalaciones y Servicios C.A. The company sold safety systems for banks. The systems included CCTV cameras, electronic access points, and other machinery to assist with verifying authenticity of checks and cash. The company focused on providing security for not only employees, customers, but also currency.
4. In 1974, my cousin, Antonio Jose Mugica, was born. He is the son of my uncle Antonio Mugica. Antonio Jose was always a strong student, he graduated with honors from Emil Friedman High School and continued his education in Germany and Spain. Antonio Jose also studied at Simon Bolivar School in Venezuela where he focused on electronic engineering, graduating first in his class.
5. In 1994, my father retired from Panavideo Instalaciones y Servicios C.A. citing irreconcilable differences with other family members.
6. In 1997, Antonio Jose graduated from Simon Bolivar University and began to work with his father, Antonio Mugica at Panavideo Instalaciones y Servicios C.A.
7. In 2000, after the State of Florida elections, Antonio Jose incorporated Smartmatic in Delaware. Antonio told me that he maintained a majority control over the company but allowed his father, Antonio Mugica, along with other cousins to have an ownership interest. In addition to the family members, Antonio Jose allowed several Venezuelan citizens to obtain an ownership interest.

8. In approximately 2000, Antonio Jose was introduced to Jorge Rodriguez through Alejandro Caribas. Alejandro Caribas was the president of FOGADE, Fondo de Proteccion Social de los Depositos Bancarios. Antonio Jose explained to me that this fund was created to steal and centralize all Venezuelan financial interests.

9. Shortly after the introduction, Antonio Jose and Jorge Rodriguez traveled to Italy in order to test and observe additional voting software.

10. In approximately 2002, Smartmatic contracted with the Venezuelan government to provide the software necessary to conduct the elections that took place in August of 2004, the "Venezuelan Recall Referendum." Prior to the elections, I saw Antonio Jose in person and on television numerous times promoting the veracity, transparency, and security of the Smartmatic voting software. Antonio Jose became known as el "Nino Barbudo." He told me that he grew his beard to appear older and fit the profile in order to gain credibility with the Venezuelan government and other future clients of Smartmatic.

11. In January of 2004, I went to Clinica el Avila in Caracas, Venezuela for the birth of my niece. While at the hospital I saw my uncle, Antonio Mugica, and we engaged into a lengthy conversation about my cousin, Antonio Jose's, recent success with Smartmatic. During the conversation, my uncle's demeanor changed. He was clearly saddened and distraught when discussing Antonio Jose and Smartmatic. When I pressed him on the issue, my uncle confided in me that Antonio Jose had converted to communism as a result of his connections with the Venezuelan government. In addition, my uncle told me with a heavy heart that Antonio Jose manipulated the Smartmatic system utilized during the election to ensure that President Chavez was successful during the 2004 elections.

12. He further explained that Antonio Jose was able to manipulate the approximately 31,000 voting machines utilized throughout Venezuela by limiting the number of votes against President Chavez to either 232 or 236. All of the remain votes were counted in favor of retain President Chavez. During what should have been a time of joy, my uncle, Antonio Mugica, was exhibiting signs of remorse, sadness, and shame over the actions taken by his son, Antonio Jose.

13. Following this encounter with my uncle, Antonio Mugica, I confronted Antonio Jose on the issues regarding the 2004 elections and he confirmed that he had converted to communism and as a result worked with the Venezuelan government to manipulate the Smartmatic systems in order to prevail during the 2004 elections in Venezuela and make sure that the communist party never lost another election in Venezuela. Antonio Jose told me that his ability to manipulate the Smartmatic systems would allow him to dominate the world.

14. Antonio Jose admitted to me that he was paid tens of millions of dollars by the Venezuelan government from 2003 through 2015 for the use of his Smartmatic systems. He also explained that his goal was to have Smartmatic implemented in every country, including the United States.

15. Over the next ten years, Antonio Jose traveled the world over selling his Smartmatic systems to various countries. He told me that the Venezuelan government provided him with numerous contacts and he ultimately sold Smartmatic systems to the Philippines, Nigeria, and other African countries.

- 16. In approximately 2006, Antonio Jose came to the United States and established a headquarters for Smartmatic in Boca Raton, Florida. In addition, he told me that he purchased Sequoia Systems in the United States and his goal was to one his voting systems to determine the outcome of the United States elections.
- 17. In 2013, my cousin Antonio Jose recruited and employed our cousin, Javier Fernandez. Javier assisted Antonio Jose with preparing the elections, allocating voting machines, and overall logistics.
- 18. Shortly after learning that Antonio Jose had hired Javier, I confronted Javier with the information Antonio Jose had provided about his ability to manipulate the Smartmatic systems and Javier confirmed that Antonio Jose was able to control the outcome of the voting.
- 19. A copy of my passport is attached hereto as Exhibit A.

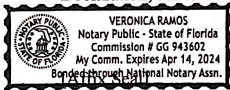
I declare under penalty of perjury that the foregoing statements are true and correct


 JUAN CARLOS COBUCCI

STATE OF FLORIDA
COUNTY OF MIAMI-DADE

JUAN CARLOS COBUCCI, appeared before me, a Notary Public in and for the above jurisdiction, this 29 day of November 2020, and after being duly sworn, made this Declaration, under oath.

FL DL C20-423-67-191-i





 Notary Public

My Commission Expires 4/14/2024