

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

THE LEAGUE OF WOMEN VOTERS OF)	
OHIO, <u>et al.</u> ,)	
)	
Plaintiffs,)	
)	
vs.)	Case No. 3:04 CV 7622
)	
J.KENNETH BLACKWELL,)	JUDGE CARR
Secretary of State,)	
)	
Defendant.)	

INTERVENORS' NOTICE OF SUPPLEMENTAL AUTHORITY

Now come Intervenors, by and through counsel, and respectfully submit as supplemental authority the attached decisions in *American Federation of Labor and Congress Industrial Organizations v. Hood*, Case No. SC04-1921 (Fla. Supreme Court, October 18, 2004) and *Colorado Common Cause v. Davidson*, Case No. 04-CV7709 (D.C. Colorado, City of Denver, October 18, 2004). These decisions provide supplemental authority in support of Intervenors' arguments that Ohio's precinct-based system of elections does not conflict with HAVA.

In addition, the Colorado decision lends support to Intervenors' position with respect to minimal identification requirements. In this regard, the Colorado court succinctly stated: "[I]f I were to try to design a system that maximizes the chances that fraudulent and ineligible registrants will be able to become fraudulent voters, I'm not sure I could do a better job than what Plaintiffs are asking me to do in this case – allow voters to vote wherever they want without showing any identification." (*See Order*, p. 26).

Respectfully Submitted,

/s/ Truman A. Greenwood
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CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2004, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Truman A. Greenwood