

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**ASSOCIATION OF COMMUNITY)
ORGANIZATIONS FOR REFORM)
NOW, et al.,)
)
 Plaintiffs,)
)
 v.)
)
CATHY COX, et al.,)
)
 Defendants.)**

**CIVIL ACTION NO.
1:06-CV-1891-JTC**

**SECRETARY OF STATE’S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
TO PROJECT VOTE**

COMES NOW the SECRETARY OF STATE OF THE STATE OF GEORGIA, Defendant herein in her official capacity, and pursuant to Fed. R. Civ. Proc. 34, makes these her first requests for production of documents to Project Vote/Voting for America, Inc. (“Project Vote” or “you”).

INSTRUCTIONS

The documents requested below should be delivered to the Defendants’ counsel within 30 days of the date of service of this request. These requests apply to drafts as well as final versions of documents; if you have drafts and final versions of a document, you should produce both. The word “document” is used

in these requests in its broadest sense to mean all kinds of documents, whether printed, copied, handwritten, or stored on any type of electronic media (including a computer, such as email). The documents produced should be separated into marked groups so that it is possible to discern which request they respond to. The documents may be “Bates” numbered at your discretion (or as agreed upon by counsel) as long as the material on the documents is not obliterated by the Bates numbers; Bates numbering will allow you to produce the documents with a list identifying the documents by numbered pages are responsive to each request.

REQUESTS

Please produce for inspection and copying the following (and if no documents are available in response to the request please so state):

1.

Copies of voter registration applications made or collected by Project Vote for persons registering to vote in Georgia after September 2006.

2.

Copies of voter registration applications made or collected by Project Vote for persons registering to vote in Georgia between September 30, 2004 and September 30, 2006.

3.

All sign-in sheets, logs, or registers made or used at “voter registration drives”(as that phrase is used in the Complaint) that were conducted by you in 2004, 2005 or 2006.

4.

All documents concerning or related to awards of financial assistance or grants to ACORN, the Georgia Coalition for the People’s Agenda, Inc. (“GCPA”), or the Georgia State Conference of NAACP Branches (“Georgia NAACP”) to conduct voter registration drives in Georgia at any time during the years 2004, 2005, and/or 2006.

5.

All letters and emails, and all enclosures to those documents, exchanged between employees, volunteers or officers of Project Vote and ACORN Project in 2004, 2005, and 2006 which concerned or related to voter registration activities or programs in Georgia.

6.

All documents discussing or showing steps taken by Project Vote to maintain the privacy and confidentiality of full nine digit social security numbers when they are included on voter registration applications.

7.

All documents showing or discussing steps taken by Project Vote to maintain the privacy of drivers license numbers when they are included on voter registration applications.

8.

All documents showing or discussing steps taken by Project Vote to maintain the privacy and confidentiality of voter identification numbers (other than full social security numbers or drivers license numbers) when they are included on voter registration applications.

9.

All documents showing or discussing Project Vote's policies or practices designed to prevent voter registration fraud.

10.

All documents showing or discussing Project Vote's policies or practices intended to prevent voting fraud by persons unlawfully voting for others.

11.

All documents used for or concerning the training of volunteers, employees, or officers of Project Vote to conduct "voter registration drives," or to process, transmit, copy, safeguard, or follow-up on voter registration applications.

12.

Copies of all complaints that have been made against or received by Project Vote relating to voter registration activities anywhere in the United States at any time between 2004 to 2006.

Respectfully submitted,

THURBERT BAKER 033887
Attorney General

DENNIS DUNN 269350
Deputy Attorney General

/s/Stefan Ritter
STEFAN RITTER 606950
Senior Assistant Attorney General

Office of the Attorney General
40 Capitol Square, S.W.
Atlanta, Georgia 30334-1300
(404) 656-3330

SIGNATURE CERTIFICATION

I certify that the originally executed document contains the signatures of all filers indicated herein and therefore represents consent for filing of this document.

/s/Stefan Ritter
STEFAN RITTER 606950
Senior Assistant Attorney General

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CERTIFICATE OF SERVICE

I do hereby certify that I have this day served the within and foregoing **SECRETARY OF STATE'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO PROJECT VOTE** with the Clerk of Court using the CM/ECF system, which will send notification of filing to the following CM/ECF participant:

Bradley Heard, Esq.
bheard@moldenholley.com

Brian W. Mellor, Esq.
electioncounsel1@projectvote.org

Elizabeth S. Westfall, Esq.
ewestfall@advancementproject.org

A printed copy of the foregoing document has been sent via United States mail, first class postage prepaid to Plaintiffs' counsel:

Bradley E. Heard
Molden Holley Fergusson Thompson & Heard
One Park Tower
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Atlanta, Georgia 30303-4501

This 12th day of January, 2007.

/s/Stefan Ritter
STEFAN RITTER
Georgia Bar No. 606950
Attorney for Defendants

