

**ATTACHMENT NINETEEN**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

INDIANA DEMOCRATIC PARTY, )  
et al., )

Plaintiffs, )

v. )

TODD ROKITA, et al., )

Defendants, )

No. 1:05-CV-00634 SEB-VSS

\_\_\_\_\_  
WILLIAM CRAWFORD, et al., )

Plaintiffs, )

v. )

MARION COUNTY ELECTION BOARD, )

Defendant, )

and )

STATE OF INDIANA, )

Intervenor. )

**INTERVENOR-DEFENDANT STATE'S ANSWERS TO PLAINTIFFS WILLIAM  
R. CRAWFORD, UNITED SENIOR ACTION OF INDIANA, INDIANAPOLIS  
RESOURCE CENTER FOR INDEPENDENT LIVING, CONCERNED CLERGY  
OF INDIANAPOLIS, INDIANAPOLIS BRANCH OF THE NAACP, INDIANA  
COALITION ON HOUSING AND HOMELESS ISSUES, AND JOSEPH  
SIMPSON'S FIRST SET OF INTERROGATORIES**

Intervenor-Defendant, State of Indiana, by Steve Carter, Attorney General of  
Indiana, and Solicitor General Thomas M. Fisher and Deputy Attorney General Doug  
Webber, answers Plaintiffs' First set of Interrogatories as follows:

**INTERROGATORY NO. 1:**

Please specify, project, estimate, or otherwise state:

- a. The number of homeless adults in Indiana who do not possess either a driver's license or state identification card issued by the Bureau of Motor Vehicles.
- b. The number of disabled adults in Indiana who do not possess either a driver's license state identification card issued by the Bureau of Motor Vehicles.
- c. The number of persons in Indiana, age 65 or older, who do not possess either a driver's license or state identification card issued by the Bureau of Motor Vehicles.
- d. The number of adults in Indiana, broken down by race, who do not possess either a driver's license or state identification card issued by the Bureau of Motor Vehicle.

**ANSWER:**

The Intervenor-Defendant, State of Indiana, does not maintain records in the categories designated 1a, 1b, 1c, and 1d.

**INTERROGATORY NO. 2:**

Please specify each incident of voter fraud, or attempted fraud, of which the State of Indiana is aware since January 1, 2002, occasioned by:

- a. Persons attempting to vote, or voting, at a voting place with fraudulent or otherwise false identification.

- b. Persons attempting to vote, or voting, fraudulently via absentee ballot.

**ANSWER:**

- a) **Persons attempting to vote, or voting, at a voting place with fraudulent or otherwise false identification.**

The Intervenor-Defendant, State of Indiana, is not aware of any incidents or persons attempting vote, or voting, at a voting place with fraudulent or otherwise false identification.

- b) **Persons attempting to vote, or voting, fraudulently via absentee ballot.**

**Alabama**

-In 2004 elections in Mayoral runoff in Greensboro, multiple absentee ballots were cast from vacant houses and addresses that were not voters' homes.<sup>1</sup>

**Connecticut**

-Absentee ballot fraud convictions for 2004 elections.<sup>2</sup>  
-Absentee ballot abuse has been a persistent problem in Hartford politics for years and has resulted in the arrest of at least eight city politicians, including two state representatives, in the past decade.

**Indiana**

-Absentee fraud occurred in the May 6, 2003 Democratic mayoral primary in the City of East Chicago. The Indiana Supreme Court noted in *Pabey v. Patrick, et al, Cause No. 45S04-0401-CV-0014; Lower Court No. 45D100305MI*, that 19.2 % of the 10,177 total votes cast in that election came from 1,950 absentee ballots of which 7.9 % were invalidated by the trial court Special Judge Steve King. King's judgment issued on August 13, 2003, gives a detailed account of the elaborate scheme devised by the incumbent Mayor Patrick and his supporters to illegally influence and manipulate absentee balloting.

**New Mexico**

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<sup>1</sup> Johnny Kampis, "Absentee Ballots Raise Questions in Greensboro," Tuscaloosa News, September 5, 2004.

<sup>2</sup> Ballot Fraud Tars All Involved, *Hartford Courant (Connecticut)*, editorial, page A14, July 29, 2005

-Fraudulent Absentee ballots in 2004 elections. One person attempted to vote 3 times. One by early voting, one by absentee and one on election day.<sup>3</sup>

**Virginia**

-Absentee vote fraud overturns 2-vote victory in May 2004 local southwest Virginia election.<sup>4</sup>

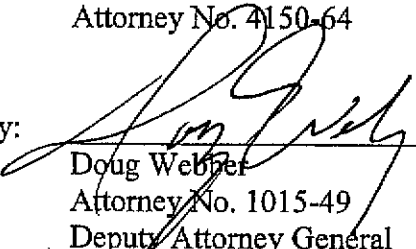
**Washington**

-Dead votes through absentee ballots, 2004.<sup>5</sup>

Respectfully Submitted,

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<sup>3</sup> <http://washingtontimes.com/upi-breaking/20041109-010659-3448r.htm>

<sup>4</sup> <http://www.roanoke.com/news/roanoke/28673.html>

<sup>5</sup> [http://seattlepi.nwsourc.com/local/206969\\_dead07.html](http://seattlepi.nwsourc.com/local/206969_dead07.html)

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a copy of the foregoing to be served upon all counsel of record listed below, by United States Mail, first-class postage prepaid on the 8<sup>th</sup> day of September, 2005

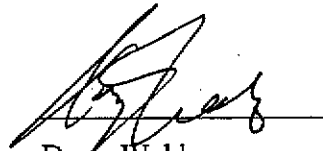
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