

**ATTACHMENT THREE**



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1 CAROL REDMAN, having been first duly sworn to  
 2 tell the truth, the whole truth and nothing but the  
 3 truth relating to said cause, deposes and says:  
 4  
 5 EXAMINATION  
 6 QUESTIONS BY MR. KENNETH J. FALK:  
 7 Q. State your name, please.  
 8 A. My name is Carol Redman.  
 9 Q. And, Ms. Redman, are you employed?  
 10 A. Yes.  
 11 Q. And where are you employed?  
 12 A. The Bureau of Motor Vehicles.  
 13 Q. And what is your business address?  
 14 A. My business address is IGCN, that stands for Indiana  
 15 Government Center North, Room 405 North, 100 North  
 16 Senate Avenue, Indianapolis, Indiana, 46204.  
 17 Q. And what is your position with the Motor of Bureau  
 18 Vehicles?  
 19 A. I'm Director of Driver Services.  
 20 Q. And what does that entail?  
 21 A. That's the issuance of driver's licenses, permits and  
 22 ID's.  
 23 Q. And you have been produced by the Bureau to speak at  
 24 this deposition; is that correct?  
 25 A. Yes.

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1 Q. And I'm showing you what's been marked as exhibit one?  
 2 A. Yes.  
 3 Q. Which is the Deposition Notice.  
 4 Have you reviewed that?  
 5 A. Yes.  
 6 Q. And you are prepared to speak for the department on  
 7 the issues in the Deposition Notice; is that correct?  
 8 A. Yes.  
 9 Q. Now I'm showing you what's been marked as exhibit two.  
 10 MR. FALK: Go off of the record for a second.  
 11 (A discussion was held off of the record.)  
 12 MR. FALK: Back on the record.  
 13 Q. You have exhibit two in front of you?  
 14 A. Yes.  
 15 Q. And am I correct in saying that this is the current  
 16 identification requirements in order to obtain a  
 17 license or State ID from the Bureau of Motor Vehicles?  
 18 A. Yes.  
 19 Q. And we had an off-the-record conversation concerning  
 20 the fact that these requirements are also listed on  
 21 the BMV's website?  
 22 A. Yes.  
 23 Q. Is exhibit two different than what's on the website?  
 24 A. I think we found something yesterday that was  
 25 different.

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1 Q. And what did we find that was different?  
 2 A. I'm trying to remember.  
 3 MR. FALK: We can go off the record. I'm sorry.  
 4 (A discussion was held off of the record.)  
 5 MR. FALK: Back on the record.  
 6 A. Yes. The change of address confirmation form CNL 107  
 7 from the U.S. Postal Service is not listed on the  
 8 website on the proof of residency.  
 9 Q. I see. As a way of confirming that you are, indeed,  
 10 at the residence you are claiming?  
 11 A. Yes.  
 12 Q. And this went into effect July of 2002, is that  
 13 correct, these identification requirements?  
 14 A. Yes.  
 15 Q. And are any changes planned to these identification  
 16 requirements?  
 17 A. Yes.  
 18 Q. And what are the changes that are planned?  
 19 A. Well, we have actually several. Do you mind if I go  
 20 through them?  
 21 Q. No. I would like you to go through them.  
 22 A. The primary documents for individuals coming in from  
 23 out of country immigrants --  
 24 MR. WEBBER: Slow down a little bit.  
 25 Go ahead.

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1 A. There are quite a few more immigration documents that  
 2 we became aware of that we can accept.  
 3 Q. Okay. What else? That is of interest, perhaps, to  
 4 others in other cases, but not in this case which  
 5 deals with the requirements to vote for U.S. citizens.  
 6 What other changes are planned?  
 7 A. We have added a letter, in the secondary document  
 8 group, we have added a letter from a probation officer  
 9 or case worker or social worker on official letterhead  
 10 certified with a stamp or seal.  
 11 Q. That's on here now.  
 12 A. Well, you have case worker, but not social worker.  
 13 Q. I see. Okay. And what else is planned?  
 14 A. The Medicare or Medicaid card has been added to the  
 15 secondary documents.  
 16 Q. Document? Okay.  
 17 A. And on proof of residency, we have added a valid  
 18 Indiana vehicle title or watercraft registration.  
 19 Q. Okay. And are those the changes that are planned?  
 20 A. Yes. There are, with Social Security, proof of Social  
 21 Security number --  
 22 Q. Yes.  
 23 A. It's -- We have removed the last statement of BMV  
 24 Social Security affidavit, and in lieu of we were  
 25 going to accept a letter from the Social Security

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1 office verifying the applicant's Social Security  
 2 number.  
 3 Q. And have these proposed changes been published or are  
 4 they being published?  
 5 A. They go to a rule process.  
 6 MR. WEBBER: They have been published.  
 7 A. Yes. They have been published, yes, but they go  
 8 through a process later.  
 9 MR. WEBBER: Off the record.  
 10 (A discussion was held off of the record.)  
 11 MR. FALK: Okay. Back on the record.  
 12 Q. So, exhibit two with the additional changes, assuming  
 13 they are approved, will list the identification  
 14 requirements for someone that is seeking to obtain a  
 15 driver's license or state ID card; is that correct?  
 16 A. Yes.  
 17 Q. And the exhibit explains that you need to have a  
 18 combination of a primary document and secondary  
 19 documents of proof of Indiana residency and a Social  
 20 Security proof, if you're seeking a license. You  
 21 don't need the Social Security proof if you're seeking  
 22 an identification card; is that correct?  
 23 A. That's correct.  
 24 Q. In order to obtain a license or ID, and by ID in this  
 25 deposition I'm going to be referring to the State

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1 identification card; do you understand that?  
 2 A. Yes.  
 3 Q. In order to obtain a license or ID the person must  
 4 appear personally at the Bureau of Motor Vehicles; is  
 5 that correct?  
 6 A. Yes.  
 7 Q. There is no procedure to go by mail or internet or  
 8 people come out to your house? You have to appear  
 9 personally; is that correct?  
 10 A. Yes.  
 11 Q. One of the primary documents that you must have, or a  
 12 primary document that you must have includes a birth  
 13 certificate; is that correct?  
 14 A. Yes.  
 15 Q. And the birth certificate must be an original, that is  
 16 it must have a seal or be stamped; is that correct?  
 17 A. Yes.  
 18 Q. Now, some people, because of being born at home at a  
 19 time when there were not records being kept, do not  
 20 have birth certificates; is that correct?  
 21 A. Yes.  
 22 Q. And I'm showing you what's been marked as exhibit  
 23 three, which I think you already have; is that  
 24 correct?  
 25 A. Yes.

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1 Q. Could you tell me what this is?  
 2 A. This is a memo from the previous administration for  
 3 citizens over 65.  
 4 Q. And what it seems to indicate is that if someone is  
 5 over 65 who says they do not have a birth certificate,  
 6 there are ways to accept other forms of identification  
 7 as the primary document, the primary documents being  
 8 what's referred to in exhibit two; is that correct?  
 9 A. Yes.  
 10 Q. Is this policy still being observed by the department?  
 11 A. Yes.  
 12 Q. How does anyone know about this policy? It's not  
 13 promulgated; is it?  
 14 A. No.  
 15 Q. It's not on your website; is it?  
 16 A. No.  
 17 Q. Have you notified senior citizen's organizations, like  
 18 United Seniors Action, that this is a policy available  
 19 to persons over 65?  
 20 A. I don't know.  
 21 Q. Do you know about whether that has happened?  
 22 A. Not that I'm aware of.  
 23 Q. So, if a person goes onto your website and looks at  
 24 the version of exhibit two that's on the website, that  
 25 is the version of your identification policy. There

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1 won't be any mention in there about this over 65  
 2 policy; is that correct?  
 3 A. That's correct.  
 4 Q. And your identification policy, which is represented  
 5 in this deposition as exhibit two, was published  
 6 elsewhere in written form, in manuals, or is it posted  
 7 at the branches?  
 8 A. Yes. It went out to the branches as a memo, yes.  
 9 Q. But, if I come into the branch and I say I need to  
 10 know what I need to bring back in in order to be able  
 11 to get a license, do you give them a version of  
 12 exhibit two?  
 13 MR. WEBBER: Two is?  
 14 Q. Two is the actual policy?  
 15 A. The actual policy, yes.  
 16 Q. And what you give them has no reference to an over 65  
 17 policy represented by exhibit three; is that correct?  
 18 A. That's correct.  
 19 Q. Now, exhibit three states that we have created a good  
 20 cause hardship policy to be used internally and on a  
 21 case-by-case basis. Do you see that in the first  
 22 paragraph? It's like the third sentence, I believe.  
 23 A. Yes.  
 24 Q. The good cause hardship policy is exhibit three; is  
 25 that correct? There is no other policy?

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1 A. That's correct.  
 2 Q. Are there any records kept of how often this good  
 3 cause hardship policy has been used?  
 4 A. No.  
 5 Q. So you have no idea whether people ever use it?  
 6 A. No.  
 7 Q. And it only applies if you're over 65; is that  
 8 correct?  
 9 A. That's correct.  
 10 Q. And it only applies if you're over 65 and you present  
 11 such other documents in the discretion of the branch  
 12 manager that satisfies him or her that you have  
 13 established something equivalent to a birth  
 14 certificate; is that correct?  
 15 A. Yes.  
 16 Q. At the bottom of exhibit three it lists what the  
 17 persons who are older than 65 may present. Is this an  
 18 exclusive list?  
 19 A. Yes.  
 20 Q. So, if a person doesn't have what's listed at the  
 21 bottom of exhibit three, then they are not going to be  
 22 able to obtain a driver's license; is that correct?  
 23 A. Yes.  
 24 Q. And if a person is under 65 and doesn't have a birth  
 25 certificate, they will not be able to utilize this

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1 policy that's in exhibit three; is that correct? You  
 2 have to be over 65; is that correct?  
 3 A. Yes.  
 4 Q. Okay. Now I want to ask you some questions now about  
 5 the fact that identification cards are not now issued  
 6 without cost, and I'm showing you what's been marked  
 7 as exhibits four, five and six and these are three  
 8 memos that were issued very close to each other, so  
 9 I'm giving them to you together.  
 10 MR. WEBBER: Take your time.  
 11 MR. FALK: We can go off the record.  
 12 (A discussion was held off of the record.)  
 13 MR. FALK: Back on the record.  
 14 Q. I've shown you what's been marked as four, five and  
 15 six. Do you have those in front of you?  
 16 A. Yes.  
 17 Q. As I understand it, these are memos that were issued  
 18 about the no charge identification cards due to the  
 19 law change on July 1 of 2005; is that correct?  
 20 A. Yes.  
 21 Q. And from talking to your counsel some time ago it's my  
 22 understanding that there was a perceived need to make  
 23 some tweaks in the first memo and then to make tweaks  
 24 in the second memo which is why you have three memos  
 25 that are very similar being issued around the same

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1 time, including two on the same day; is that correct?  
 2 A. Yes. Yes.  
 3 Q. And, as I said, I'm not going to drill you on the  
 4 changes or differences. I just have some general  
 5 questions.  
 6 In reading four, five and six it's my  
 7 understanding that in order to get a free ID from the  
 8 Bureau of Motor Vehicles the person applying can not  
 9 currently have a valid Indiana identification or  
 10 driver's license; is that correct?  
 11 A. That's correct.  
 12 Q. So, if I'm coming in and I have an ID, how long are  
 13 ID's valid for now?  
 14 A. Four years.  
 15 Q. So, if I'm coming in, for whatever reason I don't  
 16 drive and my ID is expiring next month, I will have to  
 17 pay for a new ID; is that correct?  
 18 A. Yes.  
 19 Q. How much does that cost?  
 20 A. An ID is \$10.  
 21 Q. And a license is 12?  
 22 A. 14.  
 23 Q. 14.  
 24 So, the only way I will get a free ID is if I  
 25 don't currently have a valid ID?

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1 A. That's correct.  
 2 Q. Or license.  
 3 And in order to get a new ID, what will I have to  
 4 present in terms of identification, referring back to  
 5 exhibit two?  
 6 A. I'm confused. I'm not sure I understand. You mean a  
 7 new issue?  
 8 Q. Right. I'm coming in --  
 9 A. First time?  
 10 Q. No. I'm coming in now. It's not the first time.  
 11 First time we go to exhibit two and it tells us what  
 12 we need; is that correct?  
 13 A. Yes.  
 14 Q. But now I'm just renewing.  
 15 A. Yes.  
 16 Q. And I want to renew my ID or my driver's license and I  
 17 see in exhibit two a separate category for renewals;  
 18 is that correct?  
 19 A. Yes.  
 20 Q. So at that point I must inform you, referring to  
 21 exhibit two, or verify my Social Security number; is  
 22 that correct?  
 23 A. Yes.  
 24 Q. And is that done verbally, then?  
 25 A. Yes.

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1 Q. And if I have the same address that I've had when I  
 2 got my original license or ID, do I need to show  
 3 anything else?  
 4 A. No.  
 5 Q. If I changed my address, though, I need to show proof  
 6 of residency; is that correct?  
 7 A. Yes.  
 8 Q. And if it's been more than ten years I have to go  
 9 through the whole thing again as if it's brand new; is  
 10 that correct?  
 11 A. Yes.  
 12 Q. And is that the same even if my original ID or  
 13 driver's license was issued before the identification  
 14 policy, exhibit two, went into effect in July of 2002?  
 15 A. Yes.  
 16 Q. Now, if I have a valid identification or driver's  
 17 license from another state but I've moved to Indiana,  
 18 as I understand exhibits four, five and/or six, I will  
 19 not get a free ID; is that correct?  
 20 A. I'm not sure I understand the question.  
 21 Q. If I have moved to Indiana from another state?  
 22 A. Uh-huh.  
 23 Q. But I still have a valid license in that it has not  
 24 yet expired from my former state, as I understand  
 25 specifically exhibit four on the first page, paragraph

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1 three, it says that if someone from another state  
 2 presents you with a valid ID or driver's license from  
 3 another state they are presenting you with a valid  
 4 document so they would not get a free ID; is that  
 5 correct?  
 6 A. Yes.  
 7 Q. And that would cost \$10?  
 8 A. Yes.  
 9 Q. So, if I'm renewing, a currently valid ID is \$10. If  
 10 I want a new ID because I've moved from another state,  
 11 it's \$10?  
 12 A. Yes.  
 13 Q. As far as I still have a valid license or ID from that  
 14 former state?  
 15 A. Yes.  
 16 Q. Now, if I'm a student from another state and I request  
 17 a free ID, exhibit four indicates I don't get a free  
 18 ID, is that correct, looking at paragraph four on  
 19 exhibit four?  
 20 A. That's correct.  
 21 Q. And is that because you're presuming that that student  
 22 could vote absentee from their former state?  
 23 A. Yes.  
 24 Q. So, even if I wanted to set up residency for purposes  
 25 of voting in Indiana, I would have to pay my \$10?

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1 A. Yes.  
 2 Q. Now, the exhibits speak of two systems which I assume  
 3 are computer systems, but they have cool names, so I  
 4 thought I would ask you about them.  
 5 One is BOSS, B-O-S-S?  
 6 A. Yes.  
 7 Q. What does that stand for?  
 8 A. I couldn't tell you what it stood for, but that's our  
 9 current computer system that is in our license  
 10 branches.  
 11 Q. And is the former system known as STARS?  
 12 A. The new system that is being implemented is STARS.  
 13 Q. STARS?  
 14 A. BOSS is the old.  
 15 Q. Going from BOSS to STARS. I don't know what it means,  
 16 but it's cute. Okay.  
 17 Now, exhibit two requires that if someone is  
 18 applying for an ID or license they present secondary  
 19 documents and proof of residency; is that correct?  
 20 A. I'm sorry? Could you say that again?  
 21 Q. Sure.  
 22 Exhibit two states that in order to get a license  
 23 or ID for the first time, or if it's been more than  
 24 ten years, you have to present, in addition to the  
 25 primary document, also secondary documents and proof

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1 of Indiana residency; is that correct?  
 2 A. Yes.  
 3 Q. And that's designed, I assume, so you can be assured  
 4 that the person is who they really are; is that  
 5 correct?  
 6 A. Yes.  
 7 Q. And the proof of Indiana residency must show current  
 8 address; is that correct?  
 9 A. Yes.  
 10 Q. Not a post office box?  
 11 A. That's correct.  
 12 Q. Are you aware of people being, who have applied for an  
 13 ID or for a license who have been turned away because  
 14 they do not have with them secondary documentation or  
 15 proof of Indiana residency?  
 16 A. Yes.  
 17 Q. And also you're aware of people that have been turned  
 18 away because they don't have an original of their  
 19 birth certificate; is that correct?  
 20 A. Yes.  
 21 Q. Now, if I'm living in a nursing home or if I'm living  
 22 in some sort of group home and I have a Power of  
 23 Attorney that receives all of my information at his or  
 24 her address, how can I present proof of residency?  
 25 A. Could you explain that one more time? I'm sorry.

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1 Q. Well, for instance, I'm Power of Attorney over my  
 2 mother-in-law and let's assume I receive all of her  
 3 information, all of her bills, everything comes to me,  
 4 not only in my name, but at my address.  
 5 How would she be able, assuming she lives in a  
 6 nursing home, how would she be able to satisfy you  
 7 with proof of residency as required by exhibit two?  
 8 A. We have a residency affidavit that someone in the, an  
 9 official in the nursing home could sign for her.  
 10 Q. Okay. Is that anywhere listed on exhibit two?  
 11 A. Yes. Under proof of residency, Indiana Residency  
 12 Affidavit.  
 13 Q. Okay. And that is just an Affidavit that someone else  
 14 would fill out saying this person is living here?  
 15 A. Yes.  
 16 Q. And could that be filled out by the person themselves  
 17 or have to be filled out by a third party?  
 18 A. It has to be signed by the third party.  
 19 Q. Are you aware that in order to receive a copy of your  
 20 birth certificate in Marion County you have to show  
 21 valid ID like a driver's license or state  
 22 identification card?  
 23 A. No. I wasn't aware of that.  
 24 Q. But you have had people come to the license branches  
 25 who do not have originals of their birth certificates;

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1 is that correct?  
 2 A. That is correct.  
 3 Q. And you obviously have had people come to the license  
 4 branch to say they cannot get their birth certificate?  
 5 You obviously have had people come to the license  
 6 branch who have said they cannot obtain their birth  
 7 certificate; is that correct?  
 8 A. Yes.  
 9 Q. Because birth certificates are not available, perhaps,  
 10 if you're old enough and you were born in a place that  
 11 you were not born in a hospital; is that correct?  
 12 A. Yes.  
 13 Q. And also I assume people say they can't do it because  
 14 they can't afford the cost or for other reasons, as  
 15 well; is that correct?  
 16 MR. WEBBER: Objection. We are getting into  
 17 both hearsay and speculation as to the reasons that  
 18 are given at the license branch.  
 19 But, you can go ahead and answer if you've heard  
 20 these things.  
 21 A. I have heard various reasons.  
 22 Q. And what reasons have you heard?  
 23 A. Being out of state.  
 24 Q. You mean being born out of state?  
 25 A. Being born out of state. I'm sorry.

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1 Well, the main thing that I hear is being born  
 2 out of state.  
 3 Q. And people also have said they can't afford to  
 4 purchase a birth certificate, as well; is that  
 5 correct?  
 6 A. Not to me, but I'm sure they have.  
 7 Q. Okay. We are now going to venture into the always  
 8 scary area of numbers, scary for me, not necessarily  
 9 for you.  
 10 MR. FALK: Go off the record for a second.  
 11 (A brief recess was taken at this time.)  
 12 Q. Okay. I've shown you off the record, we've talked a  
 13 little bit about exhibit seven through 11 and before I  
 14 begin a tortured decent into mathematics, tortured  
 15 because of me, let me just ask you right up front at  
 16 the current time does the Bureau of Motor Vehicles  
 17 have an estimate of the number of adults in Indiana  
 18 who are 18 or older who are American citizens who do  
 19 not have licenses or ID's?  
 20 A. No.  
 21 Q. No estimate whatsoever?  
 22 A. (Nods.)  
 23 Q. No?  
 24 A. No. I'm sorry.  
 25 Q. But yet the Bureau is certainly aware that there are

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1 persons out there who do not currently have valid  
 2 licenses or identification cards who are older than 18  
 3 and are or will be eligible to vote come next  
 4 election; is that correct?  
 5 A. Yes.  
 6 Q. But, you don't know how many?  
 7 A. No.  
 8 Q. I figured that, and I tried to get around it by these  
 9 exhibits. So, let's go through them; okay?  
 10 I've shown you what's been marked as exhibit  
 11 seven and as you can see from exhibit seven it's a  
 12 copy of information from the United States Census.  
 13 And if you go to the Indiana line on the census, it  
 14 appears if you subtract out the population categories  
 15 of persons under the age of 18 that the census thinks  
 16 that there are 4.6 million people in Indiana 18 and  
 17 older; and you'll see that if you just go back and  
 18 subtract and go back to the column 18 years and over,  
 19 4637274 persons in Indiana currently over the age of  
 20 18.  
 21 Do you see that?  
 22 A. Yes.  
 23 MR. WEBBER: Wait a second.  
 24 Okay. Thank you.  
 25 Q. Okay. Now --

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1 MR. WEBBER: See that?  
 2 Oh. Your's is highlighted.  
 3 Q. I forgot I highlighted that. I did that for me, not  
 4 for you.  
 5 Now, I asked in exhibit one, which is the  
 6 Deposition Notice, that I indicated I was going to ask  
 7 you certain questions and one of the questions I was  
 8 going to ask you was to tell me the number of people  
 9 over 18 in the State of Indiana; is that correct?  
 10 A. Yes.  
 11 Q. And your attorney or you just listed some of the  
 12 numbers in response to the deposition topics I noted  
 13 in exhibit one and we've made that exhibit nine; is  
 14 that correct?  
 15 A. Yes.  
 16 Q. Now, in exhibit nine you, and I realize it's not you  
 17 personally, but you the Bureau of Motor Vehicles, have  
 18 estimated that there are 5.8 million people in Indiana  
 19 over the age of 18?  
 20 A. Yes.  
 21 Q. So you and the census are 1.2 million people off,  
 22 which is probably more than statistically significant.  
 23 MR. WEBBER: Objection. Actually, it's an  
 24 objection for clarification.  
 25 Could you ask her where she got that number,

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1 because I thought they were using the census, also, to  
 2 be honest with you.  
 3 MR. FALK: Sure.  
 4 Q. Hey. Why don't I ask you where you got that number  
 5 from?  
 6 A. The number was got from www.stats.Indiana.  
 7 Q. Okay. And do you have that, the raw data there in  
 8 front of you.  
 9 A. Yes.  
 10 MR. FALK: Off the record.  
 11 (A discussion was held off of the record.)  
 12 MR. FALK: Back on the record.  
 13 Q. We've had discussions off the record concerning some  
 14 of the numbers, and referring back to exhibit nine,  
 15 the first number listed there is the estimated number  
 16 of persons over 18 in Indiana, and we have gone back  
 17 to the original census data and I think we all agree  
 18 that number should be 4637274, which matches exhibit  
 19 seven; is that correct?  
 20 A. Yes.  
 21 Q. Okay.  
 22 MR. WEBBER: Counsel, if you don't mind, for the  
 23 record I would like her to go ahead and make that  
 24 modification to the exhibit.  
 25 Q. Please do.

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1 MR. WEBBER: If you would just draw a line  
 2 through the original number and put your initials  
 3 there?  
 4 A. (Witness complies.)  
 5 Q. In looking at the other numbers that you have provided  
 6 on exhibit nine, it's immediately apparent, even to  
 7 someone not swift in math, that there are more  
 8 licenses or permits and identification cards listed,  
 9 many more than there are persons over 18 in the State  
 10 of Indiana; is that correct?  
 11 A. Yes.  
 12 Q. And, actually, we should be fair. If you go back to  
 13 exhibit seven you'll see the number of persons in  
 14 Indiana who are over the age of 16, which is 4.8  
 15 million?  
 16 A. Yes.  
 17 Q. And those are, anyone over the age of 16 could have a  
 18 license or permit; is that correct?  
 19 A. Yes.  
 20 Q. And, in fact, when we talk about identification cards,  
 21 anyone in Indiana, I believe, can get identification  
 22 cards; is that correct?  
 23 A. Yes.  
 24 Q. So, on exhibit nine where it listed 1.5 million  
 25 identification cards, it could include persons who are

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1 12, for instance, whose parents have gotten them an  
 2 ID; is that correct?  
 3 A. Yes.  
 4 Q. And we had some discussions off the record as to why  
 5 the numbers are as they are, and you hypothesize it  
 6 was because the data base that you use to total these  
 7 numbers up have not purged duplicate or expired or  
 8 other sort of entries which might increase the number  
 9 listed; is that correct?  
 10 A. That's correct.  
 11 Q. So, at this point, I asked you this already, but this  
 12 is why at this point you cannot tell me how many  
 13 persons in the State of Indiana do not have licenses  
 14 or ID's who are eligible for them; is that correct?  
 15 A. That's correct.  
 16 Q. And I asked you separately in exhibit one, the  
 17 Deposition Notice, I asked you about the number of  
 18 people in the State of Indiana over 65 and their  
 19 license and identification card history, and we see  
 20 the same results on your exhibit nine, that is that  
 21 there are more licenses and identification cards  
 22 listed than human beings; is that correct?  
 23 A. Yes.  
 24 Q. And, again, that is probably due to duplicates or  
 25 perhaps even triplicates; is that correct?

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1 A. Yes.  
 2 Q. Now, I'm showing you what's been marked as exhibit  
 3 ten, and exhibit ten is something from the Criminal  
 4 Justice Institute which gave an estimate in 2001 that  
 5 there were a little more than four million licensed  
 6 drivers in the State of Indiana; is that correct?  
 7 A. Yes.  
 8 Q. Do you know what data base they used to come to that  
 9 conclusion?  
 10 A. No.  
 11 Q. Do you know what percentage of your category in  
 12 exhibit nine of license or permits includes permits as  
 13 opposed to licenses?  
 14 A. No, sir.  
 15 Q. I assume it's a rather small percentage just because a  
 16 permit is only, a valid permit is for a limited period  
 17 of time and usually results in a license?  
 18 A. Yes.  
 19 Q. How long are you allowed to have a permit for?  
 20 A. A year.  
 21 Q. Okay. Now, turning to exhibit 11, this is something I  
 22 also downloaded from the internet, which is the  
 23 fiscal, the last fiscal impact statement for the law  
 24 which became the voter ID law which is challenged in  
 25 this case.

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1 Have you seen this exhibit before?  
 2 A. No, sir.  
 3 Q. If you turn to page two of the exhibit, there's an  
 4 estimate made by the Bureau of Motor Vehicles as to  
 5 how much or what loss of revenue will occur from  
 6 giving free ID's. And could you review that paragraph  
 7 in the middle of the page for me, please, the  
 8 explanation of State revenues, because I have a couple  
 9 questions.  
 10 Okay. Here we go.  
 11 First of all it says the fee for most ID cards is  
 12 \$9. Is that incorrect?  
 13 A. Yes, it is. It is incorrect.  
 14 Q. It is \$12; is that correct?  
 15 A. 10.  
 16 Q. \$10? And there is something called a special ID card.  
 17 What is that?  
 18 A. A special ID card is for someone over 65.  
 19 Q. Okay. Do they pay less?  
 20 A. Yes.  
 21 Q. Okay. There's this phrase or this notion that the  
 22 number of annual issuances for this population is  
 23 estimated to be about \$77,100. Do you see that, the  
 24 middle of the second paragraph there?  
 25 A. Yes.

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1 Q. I'm confused as to what the population is. Does this  
 2 mean persons who are 18 or does it mean persons that  
 3 are over 18?  
 4 MR. FALK: Off the record.  
 5 Q. Back to exhibit 11, which is the fiscal impact  
 6 statement, we've been having a fascinating  
 7 mathematical decent.  
 8 Concerning the paragraph that begins on page two,  
 9 it's estimated and there are some numbers there. Were  
 10 you involved in those numbers, preparing those  
 11 numbers?  
 12 A. No.  
 13 Q. Do you have any idea what those numbers mean or to  
 14 what they refer?  
 15 A. No, sir.  
 16 Q. The third paragraph says in that same page, same  
 17 subcategory, it says, "In addition there may be  
 18 additional ID cards that have been issued because  
 19 there is no cost provision. The amount is unknown,  
 20 but then there's a physical impact as to if there was  
 21 a five percent increase; is that correct?  
 22 A. That's what it says.  
 23 Q. That physical impact is wrong because they are using  
 24 the wrong cost for the ID. That's neither here nor  
 25 there.

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1 You don't know, you being the BMV, you do not  
 2 know if any additional ID requests will be because as  
 3 a result of the free identification laws; is that  
 4 correct?  
 5 A. That's correct.  
 6 Q. Have there been any measures, comparisons of  
 7 activities to get ID's post July 1 of 2005 versus the  
 8 same period in 2004?  
 9 A. No.  
 10 Q. So, from the Bureau of Motor Vehicles perspective at  
 11 this point, the Bureau of Motor Vehicles does believe  
 12 that there are persons over the age of 18 that do not  
 13 currently have a valid license or identification card,  
 14 but at this point you simply don't know the numbers;  
 15 is that correct?  
 16 A. That's correct.  
 17 MR. FALK: Okay. Could we go off the record? I  
 18 want to talk, and we'll be right back.  
 19 (A recess was taken at this time.)  
 20 Q. I had an omitted question.  
 21 We talked about the numbers that are in your  
 22 exhibit nine and how they represent persons who may  
 23 not have been purged or duplicate numbers; is that  
 24 correct?  
 25 A. Yes.

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1 Q. When we talk about persons who may not have been  
 2 purged, your numbers in exhibit nine concerning the  
 3 number of people who have licenses or permits or ID  
 4 cards may include people who are deceased; is that  
 5 correct?  
 6 A. Yes.  
 7 Q. Or no longer residents of Indiana?  
 8 A. Yes.  
 9 Q. In addition to people who may have duplicate countings  
 10 for licenses or identification cards; is that correct?  
 11 A. Yes.  
 12 MR. FALK: I have no further questions.  
 13 MR. GROTH: I have a few questions.  
 14  
 15 EXAMINATION.  
 16 QUESTIONS BY MR. WILLIAM R. GROTH:  
 17 Q. Ms. Redman, my name is William Groth and I'm counsel  
 18 to the Indiana State Democratic Party and the Marion  
 19 County Democratic Central Committee and we are  
 20 plaintiffs in a companion case which has been  
 21 consolidated with the case that Mr. Falk represents  
 22 the plaintiffs in which is also pending in Federal  
 23 Court.  
 24 Some of this information may be available on your  
 25 website, and I understand that. And some of it may be

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1 beyond your knowledge, and if it is, just so indicate.  
 2 But, I'm curious as to where these license branches  
 3 are located. And, for example, how many are in a  
 4 particular county?  
 5 If I were to go to your website could I obtain  
 6 that information? For example, if I were curious as  
 7 to how many license branch offices there are in Allen  
 8 County, would that be obtainable by going to the BMV  
 9 website?  
 10 A. I don't know. I'm not sure I really understand what  
 11 you mean. You mean per county?  
 12 Q. Well, just for example let's use Allen County. If I  
 13 were to go to your website would it tell me how many  
 14 license branch offices are situated in Allen County?  
 15 A. I'm not sure. I would think so. I'm not sure.  
 16 Q. If that information would not be available on your  
 17 website, where would one get that information?  
 18 A. You could call us. I mean, you could call our  
 19 downtown, our offices.  
 20 Q. But if I live in Allen County that would be a long  
 21 distance phone call. Do you have an 800 number that's  
 22 listed in the phone directories throughout the State  
 23 of Indiana?  
 24 A. I don't know.  
 25 Q. So, if I'm a resident of Allen County and I need to

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1 make a transaction at the BMV for purposes of, for  
 2 example, obtaining the required form of identification  
 3 that will be necessary for voting and I want to know  
 4 where the branch is, where the nearest branch is for  
 5 me to obtain that identification, what would you  
 6 suggest I do?  
 7 A. You're in Allen County. What I've always done is told  
 8 people to look it up in their local phone book under  
 9 government offices.  
 10 Q. And then that would presumably give me the location of  
 11 BMV offices in Allen County?  
 12 A. Yes.  
 13 Q. Now, I take it that there are some counties that have  
 14 more than a single BMV location; is that correct?  
 15 A. Yes.  
 16 Q. And are there some counties that have only one BMV  
 17 location?  
 18 A. I believe so, yes.  
 19 Q. Do you know how many counties just have a single BMV  
 20 office?  
 21 A. No, sir. I don't know.  
 22 Q. Are there any counties that do not have a BMV office?  
 23 A. No. Every county has at least one branch.  
 24 Q. I was reading the newspaper this morning about some  
 25 controversy over the closing of a branch, I believe,

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1 in Gary, Indiana. Is that branch, is the branch in  
 2 Gary -- Is there one branch in Gary currently?  
 3 A. I believe there are three in that area. I'm not sure.  
 4 Q. Well, how many branches are there in the City of Gary  
 5 currently?  
 6 MR. WEBBER: Objection to the question. It's  
 7 been asked and answered.  
 8 Go ahead, if you know.  
 9 Q. If you don't know, say you don't know.  
 10 A. I don't know.  
 11 Q. Do you know how many branches there are in Lake  
 12 County?  
 13 A. No, sir. I don't know.  
 14 Q. So you wouldn't be -- Well, how would I get that  
 15 information? How would I find out? Is there a list  
 16 somewhere of all of the BMV branch offices located  
 17 anywhere in the State of Indiana?  
 18 A. Yes.  
 19 Q. And where would that list be?  
 20 A. It is on our website. I'm just not sure if it's per  
 21 county, grouped per county. That's what I'm trying to  
 22 say.  
 23 Q. Okay. All right. If I go to your website I can find  
 24 out, I can find a list of all BMV offices, but you're  
 25 not sure if it would break them down by county?

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1 A. That's correct.

2 Q. Do you know what the number of total BMV branches is

3 in the State of Indiana or could you give me an

4 estimate or approximate number?

5 A. I believe it is about 155 at this point.

6 Q. And what about the staffing at those branches? How

7 would I go about finding out how many employees are

8 employed at each one of those branches?

9 A. I don't know.

10 Q. Well, they are on the BMV payroll, are they not?

11 A. Yes.

12 Q. You have that information available; do you not?

13 MR. WEBBER: Objection. The question has been

14 asked and answered. And it's getting a little, you

15 know, on the 30(b)6 they didn't identify those areas.

16 So, counsel, I mean --

17 MR. GROTH: Well, this is cross examination.

18 MR. WEBBER: I understand. But, it is a 30(b)6

19 and in a 30(b)6 the BMV brings a representative to

20 correspond to those, and I'm just saying to be

21 cognizant of it, that she is not able to answer every

22 BMV question.

23 MR. GROTH: And I understand that, Doug.

24 Q. So, getting back to my question, do you know how, if I

25 were interested as a citizen in finding out how many

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1 employees of BMV are employed at each branch, do you

2 know how I would go about getting that information?

3 A. No, sir. I don't.

4 Q. But, you could get that information for me if I asked

5 you to?

6 A. Well, honestly, I'm not sure I could. It's not my

7 area. It's not my department.

8 Q. Whose department would that be?

9 A. It would be under branch operations.

10 Q. And who is the director of branch operations?

11 A. There are three directors. Jeffrey Brown, Tracy

12 McNutt and Leslie Mucha.

13 Q. Could you spell that last name?

14 A. I believe it's M-u-c-h-a.

15 Q. Now, if the BMV, I understand, has employees who are

16 on BMV payroll. Are they typically stationed at one

17 particular branch or are they sometimes moved from

18 branch to branch?

19 A. I honestly don't know.

20 Q. Does the BMV keep records of how many customers visit

21 each branch each day?

22 A. There are transaction reports, you know, that doesn't

23 represent people who may leave before their

24 transaction is processed.

25 Q. And are those transaction reports kept on a, kept

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1 branch by branch?

2 A. I believe so.

3 Q. Are those public records?

4 A. I don't know.

5 Q. You don't know?

6 And do you keep any records as to the number of

7 customers who are serviced by each employee at each

8 branch?

9 A. I don't know.

10 Q. Do you know whether the BMV has done any productivity

11 study to determine how much time it takes typically to

12 process a particular type of transaction?

13 MR. WEBBER: Objection as to the relevancy to the

14 voter registration case.

15 But, you can go ahead and answer, if you know.

16 A. I don't know.

17 Q. Is the BMV currently keeping information about the

18 names or numbers of individuals who are issued free

19 photo ID's since July 1 of this year?

20 A. Yes.

21 Q. And how is that information being compiled?

22 A. It's handwritten on reports and sent to me.

23 Q. How frequently is it sent to you?

24 A. It's supposed to be sent every day with the invoice.

25 Q. And did that, the act of compiling that information,

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1 did that begin on or about the date that the photo ID

2 law took effect; July 1?

3 A. Yes, sir.

4 Q. And have you compiled any numbers to-date as to how

5 many free photo ID's have been issued?

6 A. I know of an estimate of about a little over 15,000.

7 Q. And that would be through today's date?

8 A. That was for July and August.

9 Q. And that only includes people who have been issued

10 free ID's; correct?

11 A. Yes.

12 Q. Not those who have been charged?

13 A. Yes, sir.

14 MR. GROTH: That's all I have.

15 MR. OSBORN: I have nothing. Feel free.

16 MR. WEBBER: No. I'm fine. I have no questions.

17 We want signature.

18 AND FURTHER DEPONENT SAITH NOT.

19

20 \_\_\_\_\_

21 CAROL REDMAN

22

23

24

25



# INDIANA BUREAU OF MOTOR VEHICLES IDENTIFICATION DOCUMENTATION LIST AND INSTRUCTIONS

For many individuals, a Driver License or Identification Card issued by the Indiana Bureau of Motor Vehicles (BMV) is the most important means of proving their identity. The Bureau of Motor Vehicles endeavors to safeguard the integrity of driver documents and to protect the public from false and/or fraudulent applications. In accordance with Indiana Code 9-24-18-2, making a false or fraudulent application is a criminal offense punishable by imprisonment, fine and license suspension.

Documents presented to the Bureau of Motor Vehicles for identification purposes will be kept confidential.

**Only original documents or those certified by the issuing agency will be accepted. The BMV reserves the right to refuse any identification presented by the applicant that BMV personnel may find questionable. Altered documents will not be accepted. All documents must contain the applicant's name and each document must be in the English language or contain an English translation. For purposes herein, the term "valid" means "not expired."**

### NEW ISSUANCES

**A new issuance of a Driver License, Permit, or ID Card requires the applicant to present:**

NOTE: An applicant for an Indiana Identification Card is not required to present social security documentation.

- One (1) Primary Document
- One (1) Proof of Social Security Number (SSN)\*
- One (1) Secondary Document
- One (1) Proof of Indiana Residency Document
- A Primary or Secondary Document may also meet the Indiana residency requirement as long as the applicant's name and correct address are shown on the document.

**OR**

- Two (2) Primary Documents
- One (1) Proof of Social Security Number\*
- One (1) Proof of Indiana Residency Document

### RENEWALS/ AMENDMENTS

Indiana applicants who are renewing or amending an Indiana Driver License, Permit, or ID Card must surrender the License, Permit, or ID Card and verbally verify the Social Security Number on the BMV record. If the License, Permit or ID Card has the correct address, no other Proof of Indiana Residency is required. If the applicant's address has changed, one (1) Proof of Indiana Residency document must be presented. Applicants presenting a License, Permit or ID Card that has expired more than ten (10) years ago must provide documentation as if applying for a new License or Permit.

### DUPLICATES

Individuals whose License, Permit or ID Card have been lost or stolen and who are applying for a duplicate must present:

- Indiana Driver License or ID Card

**OR**

- One (1) Primary Document
- One (1) Secondary Document
- Verbal verification of Social Security Number on the BMV record
- **Proof of residency is not required unless the applicant's address has changed.**

\* If the applicant does not have a Social Security Number, the applicant must complete the BMV Social Security Affidavit.



**INDIANA BUREAU OF MOTOR VEHICLES  
DOCUMENT LIST**

<u>PRIMARY DOCUMENTS</u>	<u>SECONDARY DOCUMENTATION</u>	<u>PROOF OF INDIANA RESIDENCY</u>
<p align="center">Must present <b>one (1)</b> document</p>	<p align="center">Must present <b>one (1)</b> document</p>	<p align="center">Must present <b>one (1)</b> document</p>
<p>United States Birth Certificate with stamp or seal from:</p>	<p>In addition, any document from the list of Primary documentation may be used as a Secondary document.</p>	<p><u>For all NEW issuances and Changes of Address</u></p>
<ul style="list-style-type: none"> <li>• County Department or County Board of Health Vital Records/ Statistics Division from the applicant's State of birth</li> <li>• State Department or State Board of Health Vital Records/ Statistics Division from the applicant's State of birth</li> <li>• U.S. State Department</li> <li>• United States Territories - American Samoa, Guam, Puerto Rico, and Virgin Islands (translation may be require</li> </ul>	<ul style="list-style-type: none"> <li>• Bank Statement</li> <li>• Certified Academic Transcript</li> <li>• Confirmation of Registration Letter from an Educational Institution</li> <li>• Court documentation with stamp or seal</li> <li>• Foreign Consulate-Issued ID Card</li> <li>• Government-Issued License or ID Card</li> <li>• Hoosier RX Plan Card w/ imprinted name</li> <li>• Hoosier Works Card w/ imprinted name</li> <li>• Indiana County Pre-sentence Investigation Report with clerk stamp or seal</li> <li>• Indiana Gun Permit (Valid)</li> <li>• Indiana Probation Photo ID Card</li> <li>• Indiana Professional/Occupational license (Valid)</li> <li>• Indiana BMV Title Application w/BMV Valid Stamp</li> <li>• Indiana BMV Title or Registration (Valid)</li> <li>• Insurance Card</li> <li>• Letter from Probation Officer or Government. Caseworker on letterhead stationery, certified with court or Government stamp or seal with the applicant's name, and signature of the probation officer or caseworker</li> <li>• Major Credit or Bank Card (MC, VISA AE, and Discover ONLY) (Valid)</li> <li>• Original Out-of-State Driving Record</li> <li>• Out-of-State Driver License, Identification Card or Permit with photograph</li> <li>• Pay Check Stub – Computer generated</li> <li>• Prison Release Documentation/Photo ID</li> <li>• School Report Card (dated within 12 mos.)</li> <li>• School Photo ID Card</li> <li>• Selective Service Acknowledgement Card-SSS Form 3A</li> <li>• U.S. Divorce Decree certified by court of law with stamp or seal</li> <li>• U.S. Application of Marriage / Record of Marriage (Certified copy.) Must contain the stamped seal and be signed by the Clerk.</li> <li>• U.S. District Court Pre-Sentence Investigation Report with clerk stamp or seal</li> <li>• U.S. Military Discharge or DD214 Separation papers</li> <li>• U.S. Veterans Universal Access ID card with photo</li> <li>• W-2 Form (Federal or State) or 1099 Federal tax form</li> </ul>	<p>Any document from the list of Primary Documents or Secondary Documentation may be used as proof of Indiana residency as long as the document contains the applicant's name and residential address.</p>
<p>Certification of Report of Birth DS-1350 U.S. Consular Report of Birth FS-240 U.S. Certificate of Naturalization/ Citizenship <b>Valid U.S.Military/Merchant Marine Photo ID</b> <b>Valid U.S.Passport</b></p>	<p>For the purposes of this policy, a Post Office Box is not an acceptable residential address.</p>	<p>For the purposes of this policy, a Post Office Box is not an acceptable residential address.</p>
<p><b>Acceptable INS Documentation:</b></p>	<p>Examples of Proof of Residency include, but are <u>not limited</u>, to the following:</p>	<p>Examples of Proof of Residency include, but are <u>not limited</u>, to the following:</p>
<ul style="list-style-type: none"> <li>• Valid foreign passport with a Visa that includes a valid I-94 in the passport indicating the duration of stay in the U.S. (Canadian passports are not required to have a Visa when entering the U.S. and are exempt from this requirement.)</li> </ul>	<ul style="list-style-type: none"> <li>• Child Support Check from FSSA with name and address of the applicant attached</li> <li>• Change of Address Confirmation form (CNL107) from U.S. Postal Service listing old and new address</li> <li>• CURRENT Bill or Benefit Statement (within 60 days of issuance)</li> <li>• Indiana Driver License, Identification Card or Permit with photograph</li> <li>• Indiana Property Deed or Tax Assessment</li> <li>• Indiana Surveyor Report</li> <li>• Indiana Residency Affidavit</li> <li>• Voter Registration Card</li> </ul>	<ul style="list-style-type: none"> <li>• Child Support Check from FSSA with name and address of the applicant attached</li> <li>• Change of Address Confirmation form (CNL107) from U.S. Postal Service listing old and new address</li> <li>• CURRENT Bill or Benefit Statement (within 60 days of issuance)</li> <li>• Indiana Driver License, Identification Card or Permit with photograph</li> <li>• Indiana Property Deed or Tax Assessment</li> <li>• Indiana Surveyor Report</li> <li>• Indiana Residency Affidavit</li> <li>• Voter Registration Card</li> </ul>
<ul style="list-style-type: none"> <li>• Employment Authorization Card I-688B</li> <li>• Employment Authorization Card I-766</li> <li>• I-94 Stamped with "Section 207" Refugee Status</li> <li>• I-94 Stamped with "Section 208" Asylum Status</li> <li>• Permanent Resident Card I-551</li> <li>• Temporary I-551 stamp</li> <li>• Temporary Resident card I-688</li> <li>• Re-Entry Permit I-327</li> <li>• Refugee Travel Document I-571</li> <li>• Other INS documentation subject to BMV Driver Services approval</li> </ul>	<p align="center"><b><u>SOCIAL SECURITY NUMBER</u></b></p>	<p align="center"><b><u>SOCIAL SECURITY NUMBER</u></b></p>
<p><b>NOTE: Out-of-Country Licenses are no longer accepted as identification or proof of driving experience.</b></p>	<p align="center">Must present <b>one (1)</b> document</p>	<p align="center">Must present <b>one (1)</b> document</p>
<p><b>An applicant submitting VALID INS documentation who does not already have a valid License from another U.S. State or U.S. Territory must start with an Indiana Learner Permit. The applicant must hold the permit for a period of at least sixty (60) days before being eligible to apply for an Indiana Driver License.</b></p>	<p><b><u>Required by Indiana State and Federal law for all License and Permit transactions</u></b></p>	<p><b><u>Required by Indiana State and Federal law for all License and Permit transactions</u></b></p>
<p><b>NOTE: Minors making application for an Indiana ID card may present acceptable social security documentation as his or her "secondary" document.</b></p>	<p>For issuance of a new Driver License or Permit, the applicant <b>MUST</b> provide proof of his/her Social Security Number. If the applicant is already listed on the BMV driver file, only verbal verification is required.</p>	<p>For issuance of a new Driver License or Permit, the applicant <b>MUST</b> provide proof of his/her Social Security Number. If the applicant is already listed on the BMV driver file, only verbal verification is required.</p>
<p>State Form 50445 (03/00 02)</p>	<p>Metal or plastic "replicas" of a Social SecurityCard are not accepted.</p>	<p>Metal or plastic "replicas" of a Social SecurityCard are not accepted.</p>
<p>Please read instructions and important information on the reverse side</p>	<p>Social Security Number verification:</p>	<p>Social Security Number verification:</p>
	<ul style="list-style-type: none"> <li>• Social Security Card</li> <li>• NUMI Report – stamped and issued from the Social Security Administration (SSA) office in Baltimore, Maryland.</li> <li>• Verification of Social Security Number Letter signed and stamped from an INDIANA SSA District Office.</li> <li>• Valid U.S. Military ID card</li> <li>• BMV Social Security Affidavit (only to be used by an applicant who is attesting that they have never been issued a Social Security Number).</li> </ul>	<ul style="list-style-type: none"> <li>• Social Security Card</li> <li>• NUMI Report – stamped and issued from the Social Security Administration (SSA) office in Baltimore, Maryland.</li> <li>• Verification of Social Security Number Letter signed and stamped from an INDIANA SSA District Office.</li> <li>• Valid U.S. Military ID card</li> <li>• BMV Social Security Affidavit (only to be used by an applicant who is attesting that they have never been issued a Social Security Number).</li> </ul>



# STATE OF INDIANA

JOSEPH E. KIERNAN, GOVERNOR

Mary L. DePrez, Commissioner  
BUREAU OF MOTOR VEHICLES  
100 North Senate Avenue  
Indianapolis, Indiana 46204  
Telephone: (317) 233-6000

FILE: DRIVER SERVICES  
MEMO #031-04

**To:** ALL LICENSE BRANCH PERSONNEL; ALL REGIONAL MANAGERS;  
ALL DEPARTMENT HEADS

**FROM:** GENEVA WALKER, ASSISTANT COMMISSIONER,  
DRIVER AND VEHICLE SERVICES

**DATE:** JULY 20, 2004

**RE:** CITIZENS OVER 65 POLICY

We have had many applicants, born in the early 1900's and in certain rural areas, who have never been issued a Birth Certificate because their birth was never recorded with any State Office of Vital Statistics. We have found it very time-consuming to research decades of information in order to establish their age. Therefore, we have created a "Good Cause/Hardship" policy, to be used internally and on a case-by-case basis. When this situation is presented to the branches, the branch manager will determine if the applicant has enough documents to be eligible under this policy.

Individuals who are 65 years or older, and attest that they have never been issued a Birth Certificate because their birth was never recorded with any State Office of Vital Statistics, may present other forms of identification as a primary document, along with the secondary document, for an Indiana driver license or identification card.

Individuals who are 65 years or older may present, as a primary document:

- Medicaid/Medicare Card
- Social Security Benefits Statement
- Property Deed
- Property Tax Statement
- Bank Statements
- U.S. Veteran's Access Photo ID Card
- Marriage License/Divorce Decree
- Pension Statement

