Exhibit A
DECLARATION OF PEGGY J. TAFF

Peggy J. Taff declares the following:

1. I am over the age of eighteen and competent to make this declaration.

2. I am currently the Chief of the Bureau of Voter Registration Services ("BVRS") for the Florida Department of State Division of Elections.

3. BVRS acts as a voter registration official for purposes of entering new applications and updates to existing voter registration records into the Florida Voter Registration System ("FVRS"). Supervisors of Elections also enter the same categories of data from voter registration applications into the FVRS. Supervisors and BVRS receive applications by mail, from walk in applicants, and from other groups, including third-party voter registration groups and from other National Voter Registration Act of 1993 ("NVRA") agencies that collect applications.
4. With the exception of voter registration applications submitted through the Department of Highway Safety and Motor Vehicle ("DHSMV") as part of the driver's license application or license update process, all new voter registration applications are submitted to DHSMV for verification of the authenticity or the existence of the number as provided. If the personal identifying number provided is a driver's license number or state identification card number, the number is matched against DHSMV records for verification. If the personal identifying number provided is a Social Security number, the number is either verified against DHSMV records or forwarded onto the Social Security Administration ("SSA") for verification.

5. From January 1, 2006, to the end of September, 2007, 1,446 voter registration applications included neither the applicant's driver's license number nor the last four digits of the applicant's Social Security number.

6. After the data is transmitted to DHSMV, it is classified as matched, unmatched, or possibly matched. It is the responsibility of BVRS to review data returned from DHSMV as possible matches. If BVRS verifies through its independent review the information submitted by the voter registration applicant is valid, the record is overridden and the applicant becomes an active voter. The Supervisor of Elections is notified electronically through FVRS to process a voter information card. If BVRS is unable to verify the information, the applicant's record is submitted to the appropriate Supervisor of Elections for further review.

7. From January, 2006 to September 2007, my staff and I reviewed 36,802 applications that were received from DHSMV as possible matches. Of those, (i) BVRS resolved 30,985 applications; (ii) BVRS was unable to resolve 5,067 applications; and (iii) 750 applications were either found to be updates (not new applications) or were cancelled. During
that same time period, DHSMV returned 36,122 records as non-matches, which were not reviewed by BVRS and were returned directly to the Supervisors of Elections for further review.

8. During review of these applications, BVRS has access to DHSMV’s database, known as the Driver and Vehicle information Database (“DAVID”). In most cases, BVRS also has access to image files showing the applicant’s voter registration application.

9. Before determining that BVRS cannot resolve a possible match, BVRS personnel are instructed to make every possible attempt using DAVID and other resources to resolve the possible match. For each record for which BVRS is unable to resolve the possible match, BVRS staff are instructed to enter individualized comments into a comment field associated with the record to assist the Supervisor of Elections in any future efforts to resolve the possible match.

10. Records that are returned from SSA through DHSMV are associated with one of seven codes: (i) no match; (ii) a single match with a living person; (iii) a single match with a deceased person; (iv) multiple matches with living persons; (v) multiple matches with deceased persons; (vi) multiple matches with at least one living and one deceased person; or (vii) a data input error. Records accompanied by a code indicating a single match with a living person or multiple matches, whether with living persons or with at least one living and one deceased person, are treated as matches and not transmitted to BVRS. Records accompanied by a code indicating a single match with a deceased person, multiple matches with deceased persons, or a data input error are considered possible matches and investigated by BVRS staff as described above. Records accompanied by a code indicating no match proceed directly to the counties for further action.

11. My staff and I are very diligent in attempting to verify as many possible matches as we can. We have many tools at our disposal, including the DAVID system, application
images, and others. Our efforts are largely successful, as we resolve the substantial majority of all possible matches presented to us for review.

I declare under penalty of perjury the foregoing is true and correct to the best of my knowledge.

Executed this 21st day of November, 2007, at Tallahassee, Florida.

Peggy J. Taff