

**ASSOCIATION OF COMMUNITY ORGANIZATIONS
FOR REFORM NOW, ET AL.**

V.

CATHY COX, ET AL.

EXHIBIT 5

To Plaintiffs' Brief in Support of
Motion for Preliminary Injunction

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

ASSOCIATION OF COMMUNITY)
ORGANIZATIONS FOR REFORM NOW;)
PROJECT VOTE; and DANA WILLIAMS,)

Plaintiffs,)

v.)

CIVIL ACTION NO.)

CATHY COX; CLAUD L. MCIVER III; J.)
RANDOLPH EVANS; DAVID J. WORLEY;)
and JEFFREY K. ISRAEL,)

Defendants.)

AFFIDAVIT OF STEPHANIE L. MOORE

I, Stephanie L. Moore, do hereby state and affirm as follows:

1. I am a National Voter Registration Field Director for the Association of Community Organizations for Reform Now ("ACORN"), a position I have held since June 2006. Previously, I worked as a Stated Field Director for ACORN in Michigan.
2. As a National Voter Registration Field Director, I am responsible for making sure voter registration efforts are implemented in accordance with the standards set by ACORN and Project Vote.
3. During registration drives, registration workers typically seek out individuals who are eligible to vote, but have not registered to do so. When a registration worker encounters an eligible voter, he or she discusses the philosophy of ACORN and Project Vote that all individuals should register to vote and then should vote. The registration worker

encourages the individual to register and, if necessary, helps the individual fill out a registration form.

4. Project Vote and ACORN insist the voter registration drive includes a comprehensive set of procedures. These procedures cover areas such as:
 - a. Hiring workers from the communities where ACORN wants to increase voter registration;
 - b. Training the registration workers in how to determine voter eligibility, how to fill out voter registration cards, and how to comply with all federal and state rules for registering voters.
 - c. Collecting all mail voter registration applications collected by a worker at the end of a shift;
 - d. Tracking the mail voter registration applications submitted by worker and shift;
 - e. Visually inspecting every mail voter registration application for completeness and/or errors;
 - f. Photocopying every mail voter registration application to use in conducting quality control procedures and in monitoring the performance of state selection agencies;
 - g. Calling persons, when possible, who have provided phone numbers on their mail voter registration application to confirm the information on the application;
 - h. Following up with applicants who have errors on applications or have not completed the applications for the purpose of getting their permission to complete the application;
 - i. Recording the number of applications, the quality of applications and the results of the calls in order to track performance of individual registration workers and of the drive as an overall matter;
 - j. Delivering the applications directly to an election office on a regular basis (or mailing the applications to any out-of-state election board, if registrations have been acquired for other states);
 - k. Pointing out to election officials any applications that are incomplete or have errors;
 - l. Monitoring whether or not applications submitted through the voter registration drive are added to the official lists of eligible voters; and
 - m. Cooperating with election officials in any investigation that would lessen voter fraud.

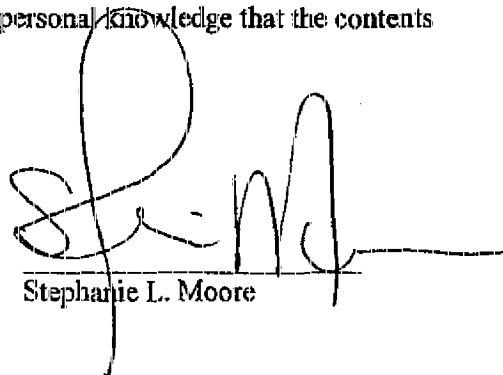
5. ACORN utilizes these procedures to maximize the number of mail voter registration applications collected by its workers that are completed by eligible applicants and added to the official lists of eligible voters.
6. It is extremely important to implement as thorough a quality check of each voter application as is feasible in order to meet ACORN's objective of transmitting complete applications for eligible voters. ACORN does not benefit by submitting incomplete or illegitimate applications because success means adding a voter to the official lists of eligible voters.
7. An effective quality control program allows ACORN to identify voter registration workers who are submitting incomplete or illegitimate voter registration applications and addresses the problem.
8. ACORN attempts to contact the individuals it has assisted to register and to encourage them to vote on Election Day. ACORN and Project Vote make follow-up calls to those persons in the days prior to Election Day, based on information from the photocopied voter registration forms.
9. ACORN attempts to contact the individuals it has assisted to register to vote to encourage them to become members of ACORN and to participate politically and actively in their community.
10. ACORN's quality control and monitoring procedures will be undermined by the regulatory requirements adopted by Georgia, which I understand require an eligible voter to seal his or her application before giving it to a voter registration worker, and barring the copying of such applications. As a result, ACORN is unable to mount an effective

voter registration drive, and cannot qualify for funding with many of the organizations that sometimes will finance those efforts.

11. Specifically, ACORN relies on various charitable sources for funding of voter registration drives, and support from those sources is often conditioned on ACORN implementing procedures for quality control and monitoring of filed applications, such as those I have described above.

12. Organizing and running formal voter registration drives is a time-consuming process. Because the general election is scheduled for November 7, 2006, the Georgia drive should begin as soon as possible.

I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the foregoing paper are true.



Stephanie L. Moore

July 24, 2006
Kalamazoo, Michigan