

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

V.

CATHY COX, ET AL.

EXHIBIT 6

**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, et. al.)	
Plaintiffs,)	CIVIL ACTION NO.
)	
v.)	
)	
CATHY COX, et. al)	
Defendants.)	
)	

Declaration of Michael Kieschnick


1. I, Michael Kieschnick, being of legal age and sound mind, do hereby depose and state as follows:
2. I am the President and Chief Operating Officer for Working Assets.
3. Working Assets is a for-profit corporation that provides wireless telephone, long distance, credit card and other services.
4. As part of its philanthropic mission, Working Assets provides both financial and in-kind support to organizations working to strengthen the democratic process.
5. In 2004 Working Assets provided funds to organizations to conduct voter registration drives in the United States, including over \$1,000,000 to Project Vote for non-partisan voter registration drives that were conducted by Project Vote jointly with a range of its community partners, including ACORN.
6. As President and Chief Operating Officer I am responsible for evaluating and determining whether and when to fund an organization that applies for a grant for voter registration drives.
7. Working Assets expects grant applicants to show that they have procedures in place which will maximize the number of eligible voters, particularly low and moderate income minorities, getting on the voter rolls and turning out to vote. Working Assets believes that an integral part of such a procedure is monitoring the completeness, legibility and accuracy of the voter registration applications the organization collects, verifying that the applicants actually get on the registration

rolls, following up to encourage those registrants to vote, and taking appropriate action when registration forms are improperly rejected.

8. An important part of Working Assets' analysis of an application for funds to sponsor a voter registration drive is whether the organization has such a procedure in place, as well as procedures that allow it to monitor and report the number of completed applications it has submitted to elections officials and the number of applicants that have successfully been added to the rolls.
9. Working Assets reviews voter registration data and voting records, and analyzes voter registration drive practices to determine if an applicant for funding has a history of successful drives and a procedure and plan in place that will likely lead to success in both adding eligible individuals to the rolls and increasing the number of eligible low and moderate income minority voters. In fact, for the purpose of evaluating grantees and the cost-effectiveness of its voter registration grant-making, Working Assets has expended substantial staff time and funds on evaluations to determine what portion of its grantees' and other organizations' voter registration applicants were added to the voter rolls and what portion of them voted.
10. I understand that Georgia's State Election Board has passed a regulation that requires voter registration applicants to seal their applications before giving them to a third party, including a worker participating in a voter registration drive. I also understand that this regulation prohibits third parties, including organizations conducting voter registration drives, from copying the application.
11. This would, in my judgment, make it impossible for voter registration grantees operating in Georgia to meet Working Assets' criteria to receive voter registration grants.

I hereby declare under penalty of perjury under the laws of the United States of America, that the foregoing information is true and correct to the best of my knowledge, information, and belief.

This 17th day of July, 2006



Michael Kieschnick