

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

4	ASSOCIATION OF COMMUNITY ORGANIZATIONS FOR REFORM NOW, et al.,)	
5)	
6	Plaintiffs,)	CIVIL ACTION
7	vs.)	FILE NO.
8	CATHY COX, et al.,)	1:06-CV-1891-JTC
9	Defendants.)	

10
11 30(b)(6) DEPOSITION OF
12 HELEN BUTLER

13
14 August 31, 2006
15 1:06 p.m.

16
17 34 Peachtree Street
18 1700 One Park Tower
19 Atlanta, Georgia

20 Susan M. Pitts, CCR-B-1806, RPR

21
22
23 BROWN
Reporting INC.

24
25 1740 Peachtree St, N.W.
Atlanta, GA 30309
404-876-8979

APPEARANCES OF COUNSEL

On behalf of the Plaintiffs:

BRADLEY E. HEARD, Esq.
Molden, Holley, Fergusson, Thompson & Heard
One Park Tower
34 Peachtree Street, N.W., Suite 1700
Atlanta, Georgia 30303-4501

On behalf of the Defendants:

STEFAN E. RITTER, Esq.
Office of the Attorney General
40 Capitol Square, S.W.
Atlanta, Georgia 30334

- - -

1 (Reporter disclosure made pursuant to
2 Article 8.B. of the Rules and Regulations of the
3 Board of Court Reporting of the Judicial Council
4 of Georgia.)

5 MR. RITTER: This will be the deposition
6 of the Georgia Coalition for the People's
7 Agenda, Inc., which is it better to call it
8 People's Agenda or GCPA?

9 MS. BUTLER: People's Agenda.

10 MR. RITTER: Okay.

11 MS. BUTLER: We are more known for
12 People's Agenda.

13 MR. RITTER: That's okay. That's what
14 I've been calling it in my pleadings, so that's
15 fine.

16 It's pursuant to notice but we stipulated
17 as to the time and place.

18 Again, I'm going to attach the notice to
19 the deposition transcript as Exhibit 2. And I'm
20 naming it 2 because I gave the first one 1 and
21 I'm just trying to stay consecutive.

22 MR. HEARD: Just continuing all through
23 the depositions. Okay.

24 (Defendant's Exhibit 2 was marked for
25 identification.)

1 MR. RITTER: Okay. And, of course, it's
2 taken pursuant to Federal Rules of Civil
3 Procedure 36. The witness that's been
4 designated is Helen Butler.

5 And why don't we go ahead and swear the
6 witness.

7 HELEN BUTLER,
8 having been first duly sworn, was examined and
9 testified as follows:

10 MR. RITTER: And let me -- first of all, I
11 assume you are going to read and sign?

12 MR. HEARD: She is going to read and sign,
13 right.

14 MR. RITTER: Again, we will use the
15 deposition, I believe, at the preliminary
16 injunction hearing, but the corrections are
17 corrections.

18 MR. HEARD: Subject to corrections, right.

19 MR. RITTER: Also, let me mention that I
20 don't hope that we take any other depositions,
21 but I would like to reserve the right should we
22 need to come back later. We're taking the basic
23 preliminary injunction stuff now.

24 MR. HEARD: I'm not saying that I'm
25 agreeing to that, I'm just saying we can talk

1 about it.

2 MR. RITTER: We can cross that bridge
3 later.

4 MR. HEARD: Yes.

5 MR. RITTER: I'm just making clear that we
6 are not waiving our right to take future
7 depositions, should it be necessary, and
8 hopefully it won't be.

9 MR. HEARD: And we won't waive our right
10 to object.

11 MR. RITTER: That's fair enough.

12 CROSS-EXAMINATION

13 BY MR. RITTER:

14 Q. Ms. Butler, of course, you know me. I
15 work at the Attorney General's office. We have met
16 before.

17 During this deposition, let me just ask
18 you to interrupt me if my questions are unclear so we
19 can make sure that my questions and your answers are
20 clear.

21 A. All right.

22 Q. Have you had your deposition taken before?

23 A. Yes.

24 Q. Tell me the circumstances of when your
25 deposition was taken before.

1 A. In a Workers' Comp case.

2 Q. Was that your Workers' Comp case?

3 A. No. I was an employer representative.

4 Q. Any other times that you've had your
5 deposition taken?

6 A. No. That's it.

7 Q. Okay. Just like at that deposition, I
8 would ask that you answer out loud and, of course,
9 with "yes" or "no" or "okay" if it's okay but no
10 "uh-huhs" or "huh-uhs", no nodding of the head,
11 please.

12 A. All right.

13 Q. Thank you. And let's really begin at the
14 beginning. Tell me your position with People's
15 Agenda?

16 A. I'm employed as the executive director for
17 the People's Agenda.

18 Q. How long have you been the executive
19 director of People's Agenda?

20 A. I've been employed since March of 2003.

21 Q. And before that, what did you do?

22 A. Before that I was with the NAACP Voter
23 Empowerment Program.

24 Q. Do you have knowledge of that program even
25 today?

1 A. No, I don't.

2 Q. Do you still work with the NAACP?

3 A. They are a part of our coalition, yes.

4 Q. And the Georgia NAACP, which is also a
5 plaintiff in this case, they are affiliated with
6 People's Agenda?

7 A. Yes, they are.

8 Q. What specifically did you do with the
9 NAACP Voter Empowerment Program?

10 A. I started out as a Voter Empowerment
11 coordinator for a specific district, and I ended up
12 being the state director for their Voter Empowerment
13 initiative.

14 Q. Okay. How long were you with the NAACP?

15 A. Since 2000 to 2003.

16 Q. And before that, where did you work?

17 A. Before that I was with a wholesale food
18 distributor.

19 Q. Okay. What was that wholesale food
20 distributor?

21 A. Alliant Food Services.

22 Q. Did you do any voter registration work at
23 that time?

24 A. No, I didn't.

25 Q. Did your voter registration work begin

1 with the NAACP Voter Empowerment Program?

2 A. Yes, it did.

3 Q. Were you a paid employee at the NAACP?

4 A. Yes, I was.

5 Q. And are you paid in your position as the
6 executive director of People's Agenda?

7 A. Yes, I am.

8 Q. How many employees does People's Agenda
9 have?

10 A. Two.

11 Q. You and who else?

12 A. Office manager.

13 Q. Does the People's Agenda conduct its own
14 voter registration drives or does it do it in
15 connection with other groups?

16 A. We do both. We conduct our own and then
17 we also coalesce with other groups.

18 Q. And what are those other groups?

19 A. They are advocacy groups. They are civil
20 rights, human rights, peace, justice, environmental
21 groups.

22 Q. Besides voter registration and helping
23 people vote and get to the polls and so forth, does
24 People's Agenda do any other type of work?

25 A. We do issue organizing around certain

1 issues that the people tell us that are important to
2 them.

3 Q. What are some of those issues?

4 A. We have criminal justice. We have
5 education. We have youth. We have women. We have
6 human rights, civil rights. And that's primarily the
7 main focus groups or issues.

8 Q. Well, let me see if I can put a little
9 meat on those bones, as they say. What does criminal
10 justice really entail? What do you do with criminal
11 justice?

12 A. We do advocacy work for criminal justice
13 issues, whether it's like opposition to the death
14 penalty or whether it's alternative sentencing,
15 whether it's juvenile justice issues, like mandatory
16 minimums, those kinds of issues, criminal justice
17 kind of issues.

18 Q. Mandatory minimums, do you oppose
19 mandatory minimums or in favor of mandatory minimums?
20 When I say "you", I mean People's Agenda?

21 A. We tend to oppose mandatory minimums.

22 Q. And as far as your youth programs, what
23 are those and tell me some of those.

24 A. Well, the youth basically is whether it's
25 an economic empowerment or whether it's getting them

1 involved in the political process.

2 The primary mission of the People's Agenda
3 is truly getting people to participate in the
4 political process, and we do that through our
5 advocacy Voter Empowerment initiatives. We register,
6 educate, mobilize, and hold our elected officials
7 accountable. And then issues become a part of just
8 galvanizing them to participate in the political
9 process.

10 Q. Okay. And the women's issues that the
11 People's Agenda works on?

12 A. Women's issues deal with equity. We are
13 working with a project that tries to get contracts
14 for women at the airport, those kinds of things.

15 Q. All right. Not just voting, lots of other
16 types of things as well?

17 A. Yes. But the primary focus for us is
18 voting. We use those issues to get the people of the
19 group that we are targeting to become involved.

20 Q. How about civil rights, what kind of
21 programs deal with civil rights?

22 A. Civil rights, again, has to do with racial
23 profiling, has to do with equal employment
24 opportunities. But, again, the focus is using those
25 issues to galvanize people to participate in the

1 political process.

2 Q. Now, I assumed earlier, but let me make
3 clear. In addition to helping -- well, tell me. In
4 addition to engaging in voter registration drives,
5 which we will define in a moment, what other types of
6 voting activities does the People's Agenda engage in?

7 A. We do educational activities, which may
8 entail candidate forums, town hall meetings, or we
9 distribute literature, just to give the public
10 information. We do a candidate's questionnaire where
11 they respond, and we publish their results for people
12 to become informed about the people that they are
13 going to elect.

14 Q. Okay. Do you assist voters in reminding
15 them to vote or getting them to the polls and so
16 forth?

17 A. Yes, we do. Again, our primary focus is
18 getting them to participate.

19 Q. All of those things?

20 A. All of those things we do to get them to
21 participate.

22 Q. Has anybody ever filed a complaint against
23 People's Agenda with the State Election Board?

24 A. No, not to my knowledge. Not to the
25 People's Agenda.

1 Q. And that would include all of the
2 individual members and people who have worked with
3 the People's Agenda that you know of?

4 A. Well, to my --

5 MR. HEARD: Let me -- are you asking her
6 whether anybody affiliated with the People's
7 Agenda has ever filed a complaint?

8 MR. RITTER: Had a complaint filed against
9 them for their election activities.

10 THE WITNESS: Against us?

11 MR. RITTER: Yes.

12 MR. HEARD: Against the People's Agenda?

13 MR. RITTER: Against the People's Agenda
14 or your employees or volunteers and so forth?

15 THE WITNESS: Our employees no, no.

16 Q. (By Mr. Ritter) No?

17 A. There have only been two of us that are
18 employed.

19 Q. I understand. What about volunteers? I'm
20 trying to be --

21 A. For our volunteers, no.

22 Q. Good. I didn't think so, I just wanted to
23 make sure.

24 A. Okay.

25 Q. Have you ever been to the State Election

1 Board meetings where cases against people in front of
2 the State Election Board are discussed and are
3 sometimes even adjudicated?

4 A. Yes, I have.

5 Q. So you are aware that process goes on?

6 A. Yes, I am.

7 Q. How many other people work with the
8 People's Agenda, I mean directly under the People's
9 Agenda rather than affiliated, such as volunteers or
10 other people besides the two paid employees?

11 A. That work directly under us?

12 Q. Yes.

13 A. It's just me and the office manager and
14 the volunteers.

15 Q. Okay. And how many volunteers?

16 A. Well, it varies by year, and it depends on
17 what our activities are.

18 Q. Let's start with now.

19 A. Start with now, that's probably four or
20 five.

21 Q. Okay. And is that a low or a high number
22 and how does it vary over time?

23 A. Excuse me. Let me correct that. We have
24 ten regional coordinators so there is ten there. But
25 additional to the ten people, we have on a regular

1 basis four to five.

2 Q. Okay. And are the regional coordinators
3 volunteers?

4 A. Yes, they are.

5 Q. And this is all just in Georgia?

6 A. Yes.

7 Q. What kind of training do these
8 individuals -- and we can take them by group, if you
9 would like. What kind of training do they receive
10 for the voter registration project?

11 A. If we are setting up and organizing the
12 voter registration drive under the People's Agenda,
13 we bring them in, we go over all the laws and
14 regulations. We actually give them a copy of the
15 voter registration forms. There are two types of
16 forms we give them that they look at and then we do
17 role play.

18 Q. What are the two forms?

19 A. You have a state voter registration form
20 and a federal registration form.

21 Q. Do you use those forms interchangeably or
22 what causes you to use one or the other?

23 A. Prior to this year we predominantly used
24 the Georgia form. And the reason we did that was
25 because it had prepaid postage on it.

1 The federal forms we are able to use now
2 and we are gravitating to using the federal forms
3 because that will allow us to be able, as our
4 understanding, to copy those and to get the
5 information so that we can do our follow up
6 Get-Out-The-Vote activities with our people that we
7 register to vote.

8 Q. Uh-huh. Tell me about the role play that
9 your folks do; how does that go?

10 A. Well, we give them different scenarios of
11 how they should, A, approach the voter, what they can
12 or can't say. We give them -- you know, for
13 instance, they may come to a mother, they may come to
14 someone who doesn't want to have time to talk to
15 them. We try to teach them skills to be able to talk
16 to that person or engage them so that they will
17 listen to our message about the importance of voting.

18 Q. Uh-huh.

19 A. And we teach them through that role play
20 also of what not to do.

21 Q. What do you tell them not to do?

22 A. We tell them what not to do based on what
23 the rules and regulations are with regards to the
24 voter registration process.

25 We tell them what rules there are for

1 felons, if they have been convicted of a crime, of a
2 felony, and have not completed their sentence or
3 their probation or not paid all of their fines, they
4 can't register to vote. They must be 17 -- I mean,
5 18 years of age or 17-1/2 and will be 18 on election
6 day. They must not be mental -- adjudicated mentally
7 incompetent. They must be a citizen. Those are the
8 kinds of things that we teach them.

9 Q. Great. Have you had any training, you
10 personally, with anybody from the Secretary of
11 State's office?

12 A. Have I had any training? I've had some
13 training in terms of the use of the voting machine.

14 Q. Okay.

15 A. And in terms of clarification of what
16 rules are, I've conversed with people from the
17 Secretary of State's office.

18 Q. And we will go back to that in a second.
19 But in terms of voter registration, you have not had
20 any training from the Secretary of State's office?

21 A. I've had training by the Fulton County
22 Voter Registration Office. I was a deputy registrar
23 2003 or '04. 2003, I believe it was.

24 Q. So to the best of your recollection, you
25 were a deputy registrar --

1 A. The best recollection I have is that it's
2 2003.

3 Q. But you were not a deputy registrar in
4 2004?

5 A. No.

6 Q. Or 2005 or 2006?

7 A. No.

8 Q. Who trained you at Fulton County?

9 A. Ms. Lorraine Birden.

10 Q. Tell me about your conversations with
11 people at the Secretary of State's office. How many
12 conversations, first of all, have you had?

13 A. Ooh.

14 Q. Dozens?

15 A. I don't know the exact number of
16 conversations I've had.

17 Q. Quite a lot of conversations, I take it?

18 A. Yes.

19 Q. And who do you typically talk to there?

20 A. It depends on what my issue is.

21 Q. Okay. As far as voter registration goes?

22 A. If I want to get forms, I talk to the
23 receptionist.

24 Q. Okay.

25 A. If I have a question about voting

1 statistics, I may talk to Francis or the other guy
2 there that gives me voting statistics.

3 Q. Is that Cliff Tatum?

4 A. No.

5 Q. Okay.

6 A. If I have a legal issue or a legal
7 interpretation in terms of how I'm interpreting the
8 rules versus them, I might go to Cliff or to Kathy
9 Rogers or to Linda. What's her name?

10 Q. Linda Beasley?

11 A. Linda Beasley. I go directly to any local
12 Board of Elections person if I have a question about
13 their processes, how they handle things, how they
14 close out the election process, those kinds of
15 things. Any question I have about the election
16 process, I first try to get it from the local person;
17 but if that doesn't satisfy me, I'll go to the State.

18 Q. Got you.

19 A. And I've also talked to the assistant
20 Secretary of State.

21 Q. That would be Laura Meadows?

22 A. I've talked to Laura. I've talked to
23 Carol Slaton.

24 Q. Okay, yes. Have you been to any of the
25 committee meetings on rules and regulations?

1 MR. HEARD: Voter registration meetings?

2 THE WITNESS: What kind of committee
3 meetings? I don't understand.

4 Q. (By Mr. Ritter) Voter registration rules,
5 for instance, have you been to the voter
6 registration --

7 A. I've been to some State Board of Elections
8 meetings. Is that what you're talking about?

9 Q. No. Sometimes there are committee
10 meetings where the public will come in or local
11 election officials and they will discuss potential
12 rules and regulations that the Election Board might
13 want to consider. Have you been to any of those?

14 A. No. I don't recall going to any of those
15 specific. I'm trying to think of what you are
16 calling that, because I'm getting it confused with
17 the Election Board meetings.

18 Q. Certainly. And you have been to the
19 Election Board meetings?

20 A. Right. And I was on the state advisory
21 HAVA committee. That's the only committee meeting
22 that I'm aware of.

23 I went to the 21st Century committee
24 meetings, all of those meetings. I believe I
25 attended all of them. I'm not certain I attended all

1 of them, but I was at a great -- a majority of them.

2 Q. And just so we clear up this, do you know
3 how many State Election Board meetings you have been
4 to?

5 A. No.

6 Q. Do you go every time they meet?

7 A. No.

8 Q. Once or twice a year?

9 A. Yeah, maybe.

10 Q. Were you at the State Election Board
11 meeting where they discussed the regulation that's
12 being challenged in this case?

13 A. No.

14 Q. Have you talked to Cliff or Kathy Rogers
15 about this regulation that you are challenging in
16 this case?

17 A. Not recently. I mean, I talked to them
18 initially when we were talking about what the process
19 for registration is.

20 Q. Well, I'm not sure I follow you. When did
21 you talk to them about what the process for
22 registration is?

23 A. Well, when I first went into doing voter
24 registration I asked them about the copying process.

25 Q. Yes. And copying was permitted at that

1 time?

2 A. No, copying was not permitted at the time.

3 Q. Okay. Did you make copies anyway?

4 A. No.

5 Q. Okay. What else did you talk to them
6 about?

7 A. What else did I talk to them about? We
8 talked about -- oh, God, there was so many things I
9 talked to them about in terms of registration, in
10 terms of the whole election process. Do you want me
11 to try to remember everything I talked to them about?

12 Q. No, that's all right. We could go through
13 that, and maybe at a later time we will. But right
14 now I really want to focus on --

15 A. Just the registration process?

16 Q. I want to focus on registration and I
17 specifically want to focus on copying and sealing.
18 Have you talked to them about the copying or sealing
19 regulation?

20 A. Yes. I did talk to them about the
21 copying, again, when I first talked about what you
22 have to do.

23 Q. That would be back in 2003?

24 A. Correct.

25 MR. HEARD: What Stefan is asking you,

1 have you talked to them since they passed the
2 rules about copying and sealing that we are
3 challenging in the lawsuit?

4 THE WITNESS: I don't recall talking to
5 them about copying and sealing since the time
6 frame that we are talking about.

7 Q. (By Mr. Ritter) Yeah. That would be from
8 the beginning of 2006?

9 A. I don't know.

10 Q. You don't recall having a conversation?

11 A. I don't recall. I don't recall. I've had
12 some conversations, but I don't recall what or when.
13 I mean, I'm sorry, I don't.

14 Q. That's fair enough. If you don't recall,
15 you don't recall.

16 Tell me about the other conversations, to
17 the best of your recollection, that you have had with
18 them about the registration process and how it would
19 be done?

20 A. Well, we talked about a -- when I first
21 came aboard, I was clarifying with them about the
22 copying because it's very cumbersome to have an
23 additional sign-in sheet, is what we did. You had
24 probability of errors. It's not accurate. You
25 couldn't have good information to do follow-up with

1 to make sure they got on the rolls timely. All of
2 that was prohibited, so I asked about the copying and
3 what was the process.

4 So after I got the clarification from
5 them, that's what I talked to them about.

6 Q. And when you say --

7 A. Now, I've also talked to them about other
8 things like I propose, you know, for election reform
9 kind of items. I've talked to them about election
10 day registration. I've talked to them about the
11 process after the lawsuit was -- about bundling, that
12 that was a good thing. I've talked to them about --
13 you know, it's just been general kind of things.

14 Q. Absolutely.

15 A. About absentee process, just like I asked
16 you in Savannah, when we were talking about how
17 people can assist people with absentee voting.

18 I try to get clarification because or
19 express my opinion to make it easier, because our
20 goal is to make voting a seamless process for the
21 voter, because that's what's deterring people from
22 participating.

23 Q. Sure. I understand that. Let me jump
24 first to the bundling thing. You talked to them
25 about bundling and you said that was a good thing.

1 Tell me what you meant by that.

2 A. Well, by bundling -- because of the Wesley
3 Foundation's lawsuit, you can now bundle, and that
4 means that people can take the registrations -- let's
5 say if I have a registration event and I get 20
6 registration applications completed, I can now bundle
7 those, put them in one envelope and send them or
8 either take them to the Secretary of State's office.

9 Q. Right. In your view that was a good
10 result in the Wesley Foundation's lawsuit?

11 A. Correct.

12 Q. Do you know the problems that the, I think
13 it's called Unity '04 campaign had with bundling?

14 MR. HEARD: Object to the
15 characterization.

16 Q. (By Mr. Ritter) Do you? You can answer.
17 He has objected.

18 A. Do I what, now?

19 Q. Did you understand that there were
20 problems with the Unity '04 campaign and problems
21 with bundling specifically?

22 A. I'm not sure about -- I know I've read
23 some things, but I'm not sure what the specifics are
24 with regards to that.

25 Q. Tell me about the Unity '04 campaign and

1 what that was?

2 A. Unity '04 is a national campaign to
3 register voters, minority voters, low income,
4 disadvantaged, youth voters; and it was a nationwide
5 project headed by the National Coalition on Black
6 Civic Participation.

7 It had a goal in registering 1.5 million
8 voters, as I said, that were either economically
9 disadvantaged, youth, minority community -- minority
10 voters.

11 We are an affiliate of Unity '04 along
12 with other coalition members. For instance, SCLC,
13 the NAACP, and others are Unity '04 affiliates as
14 well. We all come together to work together for a
15 common good, and that's to get people to participate
16 in the election process, just as the NAACP has its
17 autonomous processes for doing voter registration,
18 the People's Agenda has it, SCLC has it, and any
19 other group that has it. But all of our numbers may
20 be reported together.

21 I believe for Georgia in '04 our numbers
22 are counted for 3 -- 32,104 registrations, so we did
23 some registrations. So I don't know if all of our
24 numbers were included in that, but as an affiliate
25 the total numbers for Georgia included all of the

1 affiliates that worked for the Unity '04 campaign.

2 Q. Okay.

3 MR. HEARD: Let's breathe and let's let
4 Stefan ask some questions.

5 MR. RITTER: That's fine.

6 Q. (By Mr. Ritter) Were you aware that maybe
7 several thousand bundled voter registration
8 applications, which appeared to have been fraudulent,
9 were sent to the Secretary of State's office through
10 the Unity '04 campaign?

11 A. I don't know that they were fraudulent. I
12 read in the newspaper that -- what's that paper, the
13 Daily paper -- something about that.

14 Q. The Atlanta Journal Constitution?

15 A. No. It's called a Daily something, Daily
16 Report newspaper.

17 Q. Fulton County Daily Report?

18 A. Yes.

19 Q. Okay. You read about it in that?

20 A. Correct.

21 Q. Did you hear about it through your work
22 with People's Agenda?

23 A. Well, I know initially they had said it
24 was the People's Agenda. And I did call the
25 Secretary of State's office to clarify and Fulton

1 County to clarify that it was not the People's
2 Agenda.

3 Q. Do you know what group it was?

4 MR. HEARD: Does she know what group it
5 was what?

6 MR. RITTER: She says it was not the
7 People's Agenda.

8 Q. (By Mr. Ritter) And do you know what
9 group it was?

10 A. I believe it was the Lowery Institute.

11 Q. Does the People's Agenda pay its
12 volunteers or others to help collect voter
13 registration applications?

14 A. No. Since I've been with the People's
15 Agenda, we have not paid volunteers to do voter
16 registration.

17 Q. Are you aware of whether other groups do
18 that?

19 A. Yes.

20 Q. And what groups, to the best of your
21 knowledge, do pay their volunteers or others to help
22 register voters?

23 A. It's only what I read in the paper, and it
24 had to be the Unity '04, that situation.

25 Q. Right, with the Lowery Institute or some

1 other group?

2 A. Correct.

3 Q. Okay.

4 A. That I know for --

5 Q. For a fact?

6 A. -- a fact.

7 Q. Have you heard of others but you are not
8 sure of?

9 A. Well, again, are you talking about like
10 their employees or just pay their volunteers to do
11 voter registration.

12 Q. Pay their volunteers to do voter
13 registration?

14 A. I'm not aware.

15 Q. But other groups have employees that they
16 pay to do voter registration?

17 A. Correct.

18 Q. When you said that not being able to make
19 copies was cumbersome, tell me what you mean.

20 A. Well, the process, as I understood it to
21 be, is that the voter completes the application, it
22 has to be sealed by the voter, and there is no
23 ability for you to really check it for thoroughness,
24 to make certain that it is accurate.

25 Q. Could you check it, in your understanding,

1 while it's being filled out to help the voter?

2 A. You can do a perusal, but if you are at a
3 major event, the thoroughness is not there because
4 you have a large number that you are trying to help.
5 You may look at it, but you don't really look at it
6 thorough enough to make certain that everything is
7 there, that everything is accurate. And I can't say
8 for certain that every employee that -- not employee,
9 but volunteer that we had would actually be able to
10 do that. I know I've done voter registration, and I
11 haven't been able to do that.

12 Q. At a big event?

13 A. At a big event.

14 Q. So --

15 A. Or even at small events. It depends on
16 the number of people at your table and the number of
17 people that you have working.

18 Q. But you feel like if you do get a lot of
19 voter registration applications you can go back later
20 and check to see whether they are complete and
21 accurate?

22 A. Correct. And that you can also then do
23 follow up to make sure they got on the voter
24 registration file, so when they go vote on election
25 day they don't get there and get turned around as so

1 many have. If you look at the problems, that's what
2 it's been.

3 Q. I see. But you do keep a sign-in sheet
4 when people come to register to vote?

5 A. Yes. We try to get a sign-in sheet from
6 every person that comes by, but that isn't always the
7 case. And, again, it's because if I'm helping one
8 person over here, passing out a form over here, this
9 one has completed theirs, they leave, they forget
10 to -- even though I ask them to sign in on our
11 sign-in sheet, they may forget to do it.

12 Q. Do you have deputy registrars at all of
13 your voter registration events?

14 A. No.

15 Q. Why not?

16 A. Why not?

17 Q. Yes, why not?

18 A. Well, at all of the events all the
19 counties don't allow people to be deputy registrars.
20 In my home county, in Morgan County, they will not
21 deputize anyone because they say you can do voter
22 registration under the National Voter Registration
23 Act.

24 Q. In other words, you don't think that a
25 deputy registrar has to be there, so that's why not?

1 A. I'm going by what the election officials
2 have told me.

3 Q. Right.

4 A. Because they don't want to make people
5 deputy registrars.

6 Q. In that one situation?

7 A. No. It's in more than that one county.
8 There have been several counties that will not
9 deputize people as deputy registrars.

10 Q. Have you talked to the Secretary of
11 State's office about that?

12 A. Yes. And they said it's left up to the
13 local jurisdictions, to the local Boards of Election
14 that's controlled by your county commissioners and
15 that kind of thing. I even spoke at a county
16 commission meeting to get that changed.

17 Q. I guess the important thing is that nobody
18 suggested you were doing something wrong by not
19 having a deputy registrar at the event?

20 A. No.

21 Q. Now, can you tell me, to the best of your
22 recollection, the information that's on, let's start
23 with the Georgia voter registration application?

24 A. Okay. It has the name, the address, the
25 county, the sir name, which -- I'm trying to

1 remember. It has a mailing address, and it has a
2 street address. It has your date of birth. It has a
3 place on there for your Social Security number. It
4 has your ethnic origin. It has a place for a person
5 that's assisting a voter to certify that they helped
6 them complete the application. It has a date and
7 signature. It has a change of address information
8 where you put your old address. It has a change of
9 name if you have a name change. It has for you to
10 put on there if you want to be a poll worker. It has
11 a place on there for you to put your e-mail address.

12 Q. Excellent.

13 MR. HEARD: That's pretty good.

14 MR. RITTER: That's an A plus.

15 Q. (By Mr. Ritter) How about the federal
16 form?

17 A. The federal form has similar information.
18 The different caveat is, for the federal form you
19 have to look at each state's regulations to be able
20 to determine what goes on. They also have a place
21 for party affiliation, which we do not. Georgia
22 doesn't require you to be registered with a party.
23 The federal form does not require your Social
24 Security number. You can put the last four digits or
25 your driver's license or some other identifying

1 number that they assign. And it practically has the
2 rest of the same information.

3 Q. I understand. And once a voter
4 registration application is completed, then what
5 happens to it, at least as far as Project Vote is
6 concerned?

7 MR. HEARD: As far as People's Agenda?

8 MR. RITTER: Excuse me. I apologize.

9 Good answer.

10 THE WITNESS: I don't know about Project
11 Vote.

12 MR. RITTER: I don't know if anybody does.

13 Q. (By Mr. Ritter) People's Agenda, what do
14 you do with your completed voter registration
15 applications?

16 A. Once they are completed, they are put in a
17 mail bin by the voter and delivered to the post
18 office.

19 Q. You have your own voters mail those?

20 A. Yes. The voters -- we set up at where
21 bins are or we have the little mail things where
22 we've even had the mail people come out and pick them
23 up at certain times or that the mail bins are taken
24 to the post office.

25 Q. And then your understanding is they are

1 mailed generally to the Secretary of State's office?

2 A. That's where the address is on the outside
3 of the form.

4 Q. Exactly so. Sometimes do you deliver them
5 to local voter registration offices rather than the
6 Secretary of State's office?

7 A. No. I don't.

8 Q. When I say "you", I mean People's Agenda?

9 A. Not to my knowledge. All of our -- well,
10 in our training process, we give instructions that
11 the voter is to place the voter application in the
12 mail bin.

13 Q. On the Georgia form the postage is
14 provided; is that correct?

15 A. Correct.

16 Q. It's not provided on the federal form?

17 A. That's correct.

18 Q. Now --

19 A. And the other difference is the outside of
20 the federal form requires you to put the address as
21 to where which office it goes to.

22 Q. So you have to do that extra step of
23 filling that out?

24 A. Correct.

25 Q. And that could even be wrong what's

1 written there and could end up lost someplace?

2 MR. HEARD: Leading, objection.

3 MR. RITTER: Well, I have her on cross.

4 MR. HEARD: Understood.

5 THE WITNESS: I follow the instructions
6 that's outlined in the form as to where it
7 should be sent.

8 Q. (By Mr. Ritter) Sure. Sometimes people
9 get that wrong?

10 A. I don't know.

11 Q. Well, it may be. In any regard, does
12 People's Agenda ever send the forms themselves? I
13 know you take the white bin, but do you ever collect
14 them in bundles and send the bundles in, forms?

15 A. No. I did when I did that deputy
16 registrar event, and I only did one of those.

17 Q. All of your other events are not deputy
18 registrar events?

19 A. Correct. I wouldn't say all. Let me
20 qualify, because we do have coordinators who may be
21 deputy registrars, who would do deputy registrar
22 events.

23 Q. Some of those ten coordinators may be
24 deputy registrars?

25 A. Correct.

1 Q. And you don't know who is or not?

2 A. Not all of them, no.

3 Q. Okay. Has People's Agenda done any voter
4 registration drives this year, 2006?

5 A. Yes, we have.

6 Q. And let's be clear. When we talk about a
7 voter registration drive, I'm talking about going to
8 a specific location and handing out applications and
9 getting them filled out and having them ready so you
10 can deliver them back to the Secretary of State's
11 office?

12 A. Yes.

13 Q. How many have you done?

14 A. Let me see. I knew you were going to ask
15 me that. For this year we have had 31 events like
16 that.

17 Q. And how many more such events do you plan
18 the rest of this year?

19 A. Well, we have a schedule, a standing
20 schedule of events that we do, whether it's town hall
21 meetings or whatever, and we try to have voter
22 registration at those events. We have not done as
23 many as we normally would have because we have been
24 involved with the uncertainty of these rules and
25 regulations so we have sort of just been waiting to

1 get more clarification so that we can do, especially
2 in this critical election cycle.

3 Q. Right. But you've never been copying the
4 applications, to my understanding?

5 A. No. I've used the sign-in process.

6 Q. But at the moment have you stopped or just
7 slowed down your voter registration activities
8 because of what you feel is the uncertainty about the
9 regulation?

10 A. Well, let me go back to what you just
11 said, copying. Going forward we were going to start
12 using the federal form because it's my understanding
13 you can copy those, so it would give us a process to
14 monitor.

15 I'm working with the Advancement Project,
16 which has set some pretty good standards for groups
17 to use for voter registration. And as a part of
18 that, we use the federal form so that we can verify
19 -- we are trying to prevent problems on election day.
20 So we can verify that they got on the roll timely,
21 that their information is correct, that it gets sent
22 in and gets -- they get on the roll and they won't
23 have a problem on election day.

24 Q. All right. Now, you are still using
25 sign-in sheets, to the extent you can?

1 A. I only use it when I use for Georgia, the
2 Georgia form.

3 Q. You don't use it when you work with the
4 federal form?

5 A. No.

6 Q. And when you have the sign-in sheet, then
7 you would use that sheet to contact people back?

8 A. Yes.

9 Q. And what do you -- what kind of
10 information do you get on the sign-in sheet?

11 A. I get their name, their address, their
12 telephone number, and their e-mail address. And
13 recently we have started asking for the date of
14 birth, I guess, but that was on the federal form.

15 Q. Do you call people who you think have
16 insufficiently completed their voter registration
17 applications to get more information from them?

18 A. I can only do that with the federal forms
19 that I have. I can't do that with the Georgia form
20 because I don't know. We do a perusal before, but I
21 can't really say that. I only ask for the
22 information that they give me on my sign-in sheet.
23 That's the only thing I have to use.

24 Q. Let's step through a typical voter
25 registration event. Tell me how it proceeds

1 beginning with how is it set up.

2 A. Again, we have events that we do
3 throughout the year. Always -- well, I don't always.
4 I mean, I try to have and pass out forms to voters
5 when they come to those meetings in case they are not
6 registered or if they need to change their address or
7 if they are -- name change.

8 We try to give voters information about
9 how important it is to participate in the process.
10 So we will have a table set up at the entranceway or
11 at some focal point where the people are going to go
12 through, at least, if they are going into an event.
13 Where we have the forms, we will have literature
14 about voting, we have literature from the Secretary
15 of State's office. I even have -- sometimes I have
16 the voting machines there so that they can -- depends
17 on how close it is to the election -- where they can
18 actually touch the voting machine, they can go
19 through that process and feel it so they will
20 become -- you know, when they go in there on election
21 day, they don't have to try to remember, it will be
22 fresh in their mind.

23 Q. It will feel comfortable to them?

24 A. Right. We just set up a table. And as
25 they come in, our volunteers will engage them to talk

1 about the political process and ask them are you
2 registered, do you need to change your address.

3 We have things with ex-felons so that they
4 know, if they are afraid to even broach the subject,
5 the material is there so that they can read it. And
6 if they have questions, they can ask us when we have
7 people there to answer them.

8 Q. Now, what we are talking about at the
9 moment so that we are clear is one of your community
10 outreach type things, a forum for candidates or
11 whatever?

12 A. Correct.

13 Q. And at those do you seek anybody's
14 permission to hand out voter registration
15 applications?

16 A. No.

17 Q. What about other times, do you have other
18 types of voter registration events or drives or
19 whatever you would like to call it?

20 A. I don't understand that question.

21 Q. Well, do you go out to supermarkets, for
22 instance, and set up a table and ask the people
23 coming in to shop if they would like to register to
24 vote?

25 A. Yes, I do. I get permission from the

1 owner or the person, manager, can I set it up at your
2 location.

3 Q. There is no official permission that goes
4 with that?

5 A. No.

6 Q. Now, you set up a table, whether it's at a
7 supermarket or shopping mall or even at one of your
8 events.

9 A. Correct.

10 Q. And someone comes up and wants to register
11 to vote, take me through the process, how does it go?

12 A. I ask them to complete the application
13 here. We tell them that your current information
14 goes at the top. If you have a name change or an
15 address change, that old address goes at the bottom.
16 Complete that. And when you complete that, we want
17 you to complete our sign-in sheet because we want to
18 follow back up with you.

19 They complete it. They fill it out. We
20 show them how to pull the strip off of the thing. We
21 will do a quick perusal. Show them how to pull the
22 strip off. They pull the strip off. They fold it
23 over and put it in the mail bin.

24 Q. And that mail bin is then, when you are
25 done for the day, you take it to the post office and

1 it's sent off?

2 A. Correct.

3 Q. Do you have any requests from people to
4 make copies of the forms?

5 A. From who?

6 Q. From the registrant. If the registrant
7 says I would like a copy of my form, does that ever
8 happen?

9 A. There has been on occasion people ask do
10 they get something back.

11 Q. And what do you tell them?

12 A. We tell them no. We tell them that they
13 will get a voter registration card in two to three
14 weeks.

15 Q. Right. And People's Agenda itself does
16 not keep copies of the applications that it has
17 completed at its voter registration events?

18 A. We are now, with the federal forms.

19 Q. With the federal forms, but not with the
20 state forms?

21 A. No.

22 Q. What do you do with the federal forms, the
23 copies of the federal forms once they are -- you have
24 got the originals dropped in the mailbox bin, and
25 what do you do with the --

1 A. We review them for accuracy to make sure
2 all the information is correct. Once we have
3 asserted that the information is correct, we will
4 then enter it into our database, and then we either
5 will file it away for a certain period of time, and
6 then after that period of time is up, we will destroy
7 them.

8 Q. But you keep a database on all the people
9 you have registered?

10 A. Correct.

11 Q. And you follow up with those people to
12 make sure that they get to the polls and so forth?

13 A. Yes.

14 Q. Who does the following up on behalf of
15 People's Agenda?

16 A. Volunteers.

17 Q. Non-paid volunteers?

18 A. For Get-Out-The-Vote, it's different. You
19 said for registration. For Get-Out-The-Vote, we may
20 give them a stipend.

21 Q. And do you have drivers that help you --

22 A. They do driving. They do phone banking.
23 Those are our Get-Out-The-Vote kind of activities.
24 Occasionally we may do canvassing. But predominantly
25 our activities have been just rides to the polls and

1 phone banking.

2 Q. When you are using the Georgia form, do
3 you assist the voter in completing the form if they
4 have questions?

5 A. If they ask me a question, yes, I will
6 tell them the answer.

7 Q. If you see they have left something blank,
8 do you ask them to fill it in?

9 A. In the perusal little period before then,
10 if I catch it, I'll tell them, yes; and they will
11 correct it. But if I don't catch it, I don't have no
12 way of knowing.

13 Q. That's fair enough. But the ones that you
14 do catch you have them correct?

15 A. Correct. That's me, personally.

16 Q. Do people with People's Agenda do it
17 different ways, depending who is at the table?

18 A. No. They have all been trained -- they
19 have been trained to do the same process that I do,
20 but I can't say for certain that they all do that.

21 Q. Do you know how many voter registration
22 events, activities, and so forth you will be doing
23 between now, which is the end of August, and I guess
24 it's mid-October when registration ends in Georgia?

25 A. Well, if we get this where we are able to

1 get clarifications on the rules, we will do an
2 intensified effort, and we will probably be doing
3 something every day before the deadline for voter
4 registration. And we will even do it after then,
5 because our goal is to keep people involved and
6 engaged in the process.

7 Q. You just keep going on?

8 A. Correct.

9 Q. And you are going to be doing it, although
10 you say not as much, but you are going to be doing it
11 anyway even if the regulation is upheld?

12 A. Well, we are going to be cut back, because
13 if you have those penalties and the things that are
14 proposed in terms of the sealing process, it's really
15 going to make it difficult for us to do a thorough
16 job to really get to our people. Again, our end goal
17 is to get people to participate, and the more
18 accurate information we have, to have that ongoing
19 communication so that we can keep them engaged.

20 The problem is people don't, after
21 election day, they don't think about the other things
22 that are impacted by the voting process, and so
23 that's what we are trying to do, is to keep them
24 engaged through those other things so that they vote
25 every time there is an election, not just in

1 presidential elections.

2 Q. I see. And why don't you just use the
3 federal forms the way you described you were going to
4 do?

5 A. Well, it's my understanding, again, the
6 federal form is cumbersome. It too has where you
7 have to rewrite all of that other information with
8 the place, you have to have a stamp, it's costly to
9 do that, so...

10 Q. But it would be easier for you to keep
11 track of voters if you could make copies of the
12 Georgia form?

13 A. Yes, be more efficient.

14 Q. Now, voters can use either the Georgia or
15 the federal form at registrations?

16 A. Correct.

17 Q. And does it help the voter complete the
18 voter registration form if you are making a copy?

19 A. Pardon me?

20 Q. It doesn't help the voter complete the
21 voter registration form where you later make a copy?

22 A. It helps the voter because it helps them
23 get on the rolls and that they are not detained and
24 they don't have problems when they get there if we
25 can make certain that they are accurate.

1 Q. So making those copies you think helps you
2 check to see who's on the rolls?

3 A. Of course, because even as the voter fills
4 in our sign-in sheet sometimes they leave off
5 information. They invert things because they are in
6 a hurry. I've already completed one piece of paper,
7 now I've got to complete another piece of paper,
8 which is just -- to them, you know, they are at an
9 event, they want to participate, but they also want
10 to go home.

11 Q. I understand. Now, do people ever make
12 mistakes on their voter registration applications?

13 A. I'm sure they do. I don't know. But I'm
14 pretty sure they do. I'm pretty sure. I think the
15 Secretary of State's office can answer that better
16 than I can.

17 Q. I think we all know they do.
18 Give me just a moment and let me run
19 through this and see if there is anything else I want
20 to ask you about.

21 MR. RITTER: Brad, will you stipulate on
22 behalf of People's Agenda, like you did with
23 ACORN, that they have not filed their own
24 individual notice pursuant to --

25 MR. HEARD: The NVRA?

1 MR. RITTER: The NVRA.

2 MR. HEARD: We will stipulate to that.

3 Q. (By Mr. Ritter) Have you worked with the
4 Georgia branch of the NAACP in their voter
5 registration activities this year, in 2006?

6 A. Georgia, do you mean the state conference
7 or the local branch?

8 Q. I think it's the state conference.
9 Georgia state conference of the NAACP branches?

10 A. Let's see what I've done with them this
11 year. We have done some election protection
12 activities. I did some training for them at their
13 convention. I don't think I've done a drive with
14 them this year. I would have to look at my schedule
15 to really tell this year. I've done some training
16 for them.

17 MR. RITTER: I think that's all the
18 questions I have.

19 MR. HEARD: No questions from me. Thank
20 you.

21 (Deposition concluded at 2:02 p.m.)

22 (Pursuant to Rule 30(e) of the Federal
23 Rules of Civil Procedure and/or O.C.G.A.
24 9-11-30(e), the deponent and/or a party having
25 requested the right to review the deposition,

1 making corrections and/or changes and signing,
2 for that purpose the errata pages have been
3 annexed hereto.)
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX TO EXAMINATIONS

Examination

Page

Cross-Examination by Mr. Ritter

5

- - -

INDEX TO EXHIBITS

Defendant's
Exhibit

Description

Page

2 30(b)(6) Notice of Deposition to
Georgia Coalition for the
People's Agenda, Inc.

3

(Original Exhibit 2 has been attached to the
original transcript.)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 50 represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

This, the 1st day of September, 2006.

Susan M. Pitts, CCR-1806

1 COURT REPORTER DISCLOSURE

2
3 Pursuant to Article 8.B. of the Rules and
4 Regulations of the Board of Court Reporting of the
5 Judicial Council of Georgia which states: "Each court
6 reporter shall tender a disclosure form at the time
7 of the taking of the deposition stating the
8 arrangements made for the reporting services of the
9 certified court reporter, by the certified court
10 reporter, the court reporter's employer, or the
11 referral source for the deposition, with any party to
12 the litigation, counsel to the parties or other
13 entity. Such form shall be attached to the
14 deposition transcript," I make the following
15 disclosure:

16
17 I am a Georgia Certified Court Reporter. I am
18 here as a representative of Brown Reporting, Inc.
19 Brown Reporting was contacted to provide court
20 reporting services for the deposition. Brown
21 Reporting will not be taking this deposition under
22 any contract that is prohibited by O.C.G.A.
23 15-14-37(a) and (b).

24
25 Brown Reporting has no contract/agreement to
provide reporting services with any party to the
case, any counsel in the case, or any reporter or
reporting agency from whom a referral might have been
made to cover this deposition. Brown Reporting will
charge its usual and customary rates to all parties
in the case, and a financial discount will not be
given to any party to this litigation.

Susan M. Pitts

Susan M. Pitts, CCR-B-1806

DEPOSITION OF HELEN BUTLER /SMP

I do hereby certify that I have read all questions propounded to me and all answers given by me on the 31st day of August, 2006, taken before Susan M. Pitts, and that:

- 1) There are no changes noted.
2) The following changes are noted:

Pursuant to Rule 30(e) of the Federal Rules of Civil Procedure and/or the Official Code of Georgia Annotated 9-11-30(e), both of which read in part: Any changes in form or substance which you desire to make shall be entered upon the deposition...with a statement of the reasons given...for making them. Accordingly, to assist you in effecting corrections, please use the form below:

Page No. Line No. should read:

Page No. Line No. should read:

Page No. Line No. should read:

Page No. Line No. should read:

Page No. Line No. should read:

Page No. Line No. should read:

Page No. Line No. should read:

Page No. Line No. should read:

Page No. Line No. should read:

Page No. Line No. should read:

DEPOSITION OF HELEN BUTLER /SMP

Page No. _____ Line No. _____ should read: _____

Page No. _____ Line No. _____ should read: _____

Page No. _____ Line No. _____ should read: _____

Page No. _____ Line No. _____ should read: _____

Page No. _____ Line No. _____ should read: _____

Page No. _____ Line No. _____ should read: _____

Page No. _____ Line No. _____ should read: _____

Page No. _____ Line No. _____ should read: _____

If supplemental or additional pages are necessary, please furnish same in typewriting annexed to this deposition.

HELEN BUTLER

BROWN
Reporting INC.

1740 Peachtree St, N.W.
Atlanta, GA 30309

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

**ASSOCIATION OF COMMUNITY)
ORGANIZATIONS FOR REFORM)
NOW, et al.,)**

Plaintiffs,)

v.)

CATHY COX, et al.,)

Defendants.)

**CIVIL ACTION NO.
1:06-CV-1891-JTC**

**30(b)(6) NOTICE OF DEPOSITION TO
GEORGIA COALITION FOR THE PEOPLE'S AGENDA, INC.**

**TO: Georgia Coalition for the People's Agenda, Inc.
c/o Bradley E. Heard, Esquire
Molden Holley Fergusson Thompson & Heard
One Park Tower
34 Peachtree Street, NW, Suite 1700
Atlanta, Georgia 30303-4501**

**PLEASE TAKE NOTICE that on Wednesday August 30, 2006, unless
another date is agreed upon in writing or email by counsel for the parties, counsel
for the Defendants in the above styled action will take the deposition of the
Georgia Coalition for the People's Agenda, Inc. ("PEOPLE'S AGENDA")
pursuant to Fed. R. Civ. Proc. 30(b)(6). Pursuant to Rule 30(b)(6), PEOPLE'S**

**DEFENDANT'S
EXHIBIT
2**

AGENDA shall produce one or more witnesses knowledgeable to testify on its behalf as to the following subjects:

- 1) PEOPLE'S AGENDA's voter registration drives in Georgia, including, but not limited to:
 - a. the process and methodology by which those drives are planned;
 - b. the process and methodology by which those drives are conducted;
 - c. PEOPLE'S AGENDA's handling of voter registration applications during a voter registration drive and after a voter registration drive;
 - d. the training PEOPLE'S AGENDA provides for its volunteers and representatives regarding voter registration drives and the handling of voter registration applications;
 - e. the safety and security measures PEOPLE'S AGENDA takes regarding voter registration applications;
 - f. the steps and process PEOPLE'S AGENDA takes to return voter registration applications to governmental authorities;
 - g. the permissions or certifications PEOPLE'S AGENDA gets, if any, to conduct a voter registration drive;

- h. the dates, times, and places of each organized voter registration drive conducted by PEOPLE'S AGENDA in Georgia during the past two years;
 - i. the dates, times, and places for upcoming voter registration drives by PEOPLE'S AGENDA in Georgia through the remainder of the 2006 calendar year;
 - j. the persons responsible for conducting PEOPLE'S AGENDA's voter registration drives in Georgia;
 - k. the ability of PEOPLE'S AGENDA to obtain the names and addresses and other information of voter registration applicants in Georgia;
 - l. the use and payment of paid employees or paid volunteers to complete voter registration applications;
 - m. the contact of voters or transportation of voters to the polls on election days in Georgia;
 - n. the assistance of voters with the completion of voter registration applications.
- 2) The allegations in the Complaint in the above styled case, both in general and specifically as to each paragraph;

- 3) The statements of Helen Butler in her affidavit attached as Exhibit 1 to Plaintiffs' Brief in Support of Preliminary Injunction (to the extent that the witness cannot testify on personal knowledge as to the truth of those statements, then Ms. Butler should testify as the appropriate witness);

In addition, the deposition(s) taken pursuant to this notice shall address the responsibilities, background and qualifications of each witness produced by PEOPLE'S AGENDA to testify on its behalf. The deposition(s) taken pursuant to this notice shall commence at 2:30 p.m. in Room 332 at the offices of the Attorney General of Georgia, at the address indicated below, shall be taken and transcribed by a notary public or some other officer duly authorized to administer oaths, and shall be taken for all purposes allowed by law, including discovery, cross examination and preservation of testimony for use in subsequent proceedings.

Dated this 25th day of August, 2006.

THURBERT BAKER 033887
Attorney General

DENNIS DUNN 269350
Deputy Attorney General

/s/Stefan Ritter
STEFAN RITTER 606950
Senior Assistant Attorney General

Office of the Attorney General
40 Capitol Square, S.W.
Atlanta, Georgia 30334-1300
(404) 656-3330

SIGNATURE CERTIFICATION

I certify that the originally executed document contains the signatures of all filers indicated herein and therefore represents consent for filing of this document.

/s/Stefan Ritter
STEFAN RITTER 606950
Senior Assistant Attorney General

40 Capitol Square, S.W.
Atlanta, Georgia 30334-1300
Telephone: (404) 656-4666
Fax: (404) 657-9932
E-mail: stefan.ritter@law.state.ga.us

CERTIFICATE OF SERVICE

I do hereby certify that I have this day served the within and foregoing
**30(b)(6) NOTICE OF DEPOSITION TO GEORGIA COALITION FOR THE
PEOPLE'S AGENDA, INC.** by hand delivery and filed a corresponding notice
with the Clerk of Court using the CM/ECF system, which will send notification of
filing to the following CM/ECF participant:

Bradley E. Heard
Molden Holley Fergusson Thompson & Heard
One Park Tower
34 Peachtree Street, NW, Suite 1700
Atlanta, Georgia 30303-4501

This 25th day of August, 2006.

/s/Stefan Ritter
STEFAN RITTER
Georgia Bar No. 606950
Attorney for Defendants