

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

INDIANA DEMOCRATIC PARTY,)
et al.,)
)
 Plaintiffs,)

vs.)

CAUSE NO: 1:05-CV-0634-SEB-VSS

TODD ROKITA, *et al.*,)
)
 Defendants.)

WILLIAM CRAWFORD, *et al.*,)
)
 Plaintiffs,)

vs.)

MARION COUNTY ELECTION BOARD,)
)
 Defendant,)

and)

STATE OF INDIANA,)
)
 Intervenor.)

AFFIDAVIT OF MARY M. ANDERSON

Mary M. Anderson, being duly sworn upon her oath, deposes and states as follows:

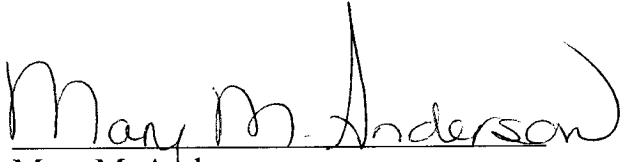
1. I am over the age of 18, of sound mind, and the representations contained herein are based upon my personal knowledge.

EXHIBIT:
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2. I am the interim Executive Director of the Lafayette Urban Ministry. The Lafayette Urban Ministry is a non-profit ecumenical organization that provides assistance and relief to needy children and families living within the area of Lafayette, Indiana.
3. The Lafayette Urban Ministry opposed the General Assembly's passage of SEA 483 because our organization believed it would be harmful to the voting rights of low income individuals. This belief was based in part upon the difficulty that our low income clients have had in obtaining picture identification from the State of Indiana.
4. In 2004, Lafayette Urban Ministry had almost 150 requests for assistance from our clients in obtaining picture IDs, mostly for employment or benefit procurement. Of those requests, fewer than 75 individuals ever received their picture ID.
5. The difficulty our clients have usually centers on the fact that most states, including Indiana, require that a request for a birth certificate be accompanied by a copy of a valid picture ID. Since a birth certificate is usually required in order to obtain a picture ID from the Indiana Bureau of Motor Vehicles, our clients are caught in a bureaucratic Catch-22 where they can obtain neither document.

FURTHER AFFIANT SAYETH NOT.

I swear, under the penalties for perjury, that the foregoing representations are true to the best of my knowledge and belief.


Mary M. Anderson

STATE OF INDIANA)
) SS:
COUNTY OF TIPPECANOE)

Subscribed and sworn to before me, a Notary Public, in and for the State of Indiana, County of Tippecanoe, on this 11th day of October, 2005.



Notary Public

County of Residence: *Tippecanoe*
My Commission Expires: *1-26-2012*