

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
CASE NO. 08-21243-CIV-ALTONAGA/Brown

League of Women Voters of Florida, et al.,
Plaintiffs,

vs.

Kurt S. Browning, in his official capacity,
and Donald L. Palmer, in his official
capacity,

Defendants.
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30(b)(6) DEPOSITION OF  
SARAH JANE BRADSHAW and DIVISION of ELECTIONS  
BY SARAH JANE BRADSHAW

June 12, 2008  
10:11 a.m.

301 South Bronough Street  
Suite 600  
Tallahassee, Florida

Karen F. Howard, Registered Professional Reporter  
and Notary Public in and for the State of Florida at Large

Elisa Dreier Reporting Corp. (212) 557-5558  
780 Third Avenue, New York, NY 10017

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SARAH JANE BRADSHAW,  
having been sworn as a witness, testified as follows:

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Q Now, that, in fact, does say that -- you testified that you received right before the book closing date in 2004 bundled -- quote, bundled up in boxes sent to us by third-party groups. Is that correct?

A That's correct.

Q Now, you just testified, however, that you had no knowledge of which applications came from third-party groups.

A Okay. And I apologize. I thought that you were talking about since we had the law regarding third-party organizations. There was no law back in 2004 and we didn't enter them, so yes.

Q All right. Thank you for the clarification. Let me just ask you about this statement that you made about 2004.

A Okay.

Q Is it an accurate statement?

A Yes, it is. Generally by mail, I think, is -- some of them came in hand-delivered; some came in by mail.

1 Q And how did you -- how did you learn about the  
2 receipt of these -- yeah, how did you learn about the  
3 receipt of these forms from the third-party registration  
4 organizations?

5 A Back then we sorted those and sent them to the  
6 counties for input. We were getting them in such large  
7 quantities that we actually had to borrow employees from  
8 other divisions in the department to help us sort and  
9 mail them because there were so many of them.

10 Q When did you first become aware of this  
11 problem?

12 A Probably August -- August of 2004, sometime  
13 around in that vicinity would be my guess.

14 Q Okay. Maybe I need to clarify my question. I  
15 believe the testimony only refers to the week prior to  
16 the book closing deadline. Is that correct?

17 A Well, we -- the testimony is for the week  
18 before, but we also received them between the book  
19 closing for the primary and the general election. We  
20 were getting them on a continual basis through then.

21 Q Okay. How did you personally become aware of  
22 this problem?

23 A When we were required to borrow staff from  
24 other divisions to help process them and get them to the  
25 counties.

1 Q That only tells me that you were receiving  
2 large quantities, not necessarily that they were from  
3 third-party voter registration groups. How did you  
4 become aware that these applications were being  
5 submitted in bulk, if they were, from third-party voter  
6 registration organizations?

7 A Because at some point I saw the boxes that  
8 they came in.

9 Q Okay. And how did the boxes indicate that  
10 they were from these groups?

11 A I presume that they had a -- some kind of  
12 identifying information on who they came from, but they  
13 were boxed up and mailed in, a number of applications  
14 from various folks in one box.

15 Q Okay. And because they were in one box you  
16 presumed that they were -- you presumed that they were  
17 the same -- they were from the same organization?

18 A Or they were from somebody who gathered them  
19 up.

20 Q Now, you said that you saw the boxes and you  
21 presumed they had some identifying marks on them, but  
22 you do not actually recall them having identifying marks  
23 as to their source?

24 A No.

25 Q Do you know who delivered these applications,

1 these boxes?

2 A No, I don't.

3 Q Do you know, in fact, that these boxes were  
4 the result of voter registration drives?

5 A No, I personally don't know that.

6 Q What do you mean by you don't personally know  
7 it?

8 A Well, I remember talking to staff that  
9 processed some of these who said that they appeared to  
10 all be coming from an organization that sent them to us,  
11 so I have no personal knowledge of how they were  
12 collected.

13 Q Do you know which organization?

14 A No. I don't believe it was only one. I think  
15 there were multiple --

16 Q Did you --

17 A It was my sense that there were multiple  
18 organizations involved.

19 Q But because you don't know which organization,  
20 there's no way that you could verify that?

21 A That's correct.

22 Q Did you ever hear any names of particular  
23 groups that might have?

24 A I probably did back then, but I don't recall  
25 who it would have been.

1 Q These boxes of applications, do you have any  
2 knowledge as to how long the period was between the  
3 times that the applications in the box were signed and  
4 the time that they were actually delivered to your  
5 office?

6 A I know that I had conversations with both  
7 staff in our office and, I believe, some supervisors who  
8 were distressed because there were applications received  
9 after the book closing date for the primary that were  
10 signed in May and June and received after book closing.

11 So I remember having discussions with both our  
12 staff and some supervisors who called who were saying  
13 that these persons -- because we didn't receive the  
14 applications before book closing for the primary were  
15 therefore not entitled to vote in the election.

16 Q But it sounds to me -- and correct me if I'm  
17 wrong -- that these are actually two different events,  
18 because the applications that were received by  
19 supervisors of elections office would not have ever  
20 gotten to your office at that time, right?

21 A No, when I was talking about the supervisors,  
22 it was ones that we had sent down to them.

23 Q Oh, I see. I see.

24 All right. And when you send it to them, was  
25 it after the book closing deadline?

1 A Yes.

2 Q Are you sure about that?

3 A Well, some of them were. Some of them were.  
4 Not all of them were, but there were -- the ones that  
5 they were complaining about were received, for example,  
6 after the book closing for the primary that had been  
7 done months earlier. We also received some after the  
8 book closing for the general.

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Q Do you recall receiving -- for the general election of 2004, do you recall receiving applications after the book closing deadline from third-party -- strike that.

Do you recall receiving applications after the book closing deadline from a single source in which the applications had been signed prior to the book closing deadline but you did not receive it until after the book closing deadline?

A Yes.

Q You do recall that?

A Yes.

Q Do you recall any specifics about that? Was it one box?

A I don't recall how many boxes, but I do recall that we received at least one if not multiple boxes of applications the day after -- at least the day after and maybe a couple of days after book closing.

Q And the applications inside were prior to the book closing deadline?

A Yes.