Exhibit 11

Robert Vitale, "Foreclosed-on Voters Using Old Addresses Could Snag Election," *Columbus Dispatch* (July 6, 2008)
Foreclosed-on voters using old addresses could snag election
Sunday, July 6, 2008 3:36 AM
By Robert Vitale
THE COLUMBUS DISPATCH


If there's Election Day disorder brewing for 2008, it might well be rooted in the nation's mortgage-foreclosure crisis. In Columbus, across Ohio and in other key presidential battlegrounds, more people losing their homes means more registered to vote from addresses where they no longer live.

Although federal law ensures that most still will be able to cast a ballot on Nov. 4, Ohio voters with outdated addresses risk pre-election challenges and trips from polling place to polling place. They're also more likely to cast provisional ballots that might not be counted.

"It's a real issue," said Daniel Tokaji, an Ohio State University law professor who wonders whether foreclosures might explain the increasing percentages of provisional votes cast between 2004 and Ohio's latest election, the presidential primary in March.

Nearly 3,700 people are registered to vote at Columbus addresses the city lists as vacant, according to records maintained by the city's code-enforcement office and the Franklin County Board of Elections.

The number of voters on the move, though, is higher than that. The board of elections sent out a plea in January to about 27,000 Franklin County residents who had filled out change-of-address forms with the U.S. Postal Service but hadn't updated their voter registrations.

Only about 10,000 had responded through the end of May, but Deputy Director Matthew Damschroder said that still helped fuel a 25 percent increase compared with 2004 in registration activity -- new registrations and address changes.

Keeping registrations current -- a responsibility of voters, not the county -- is a constant battle. Boards of health send regular updates so they can remove dead people from the rolls. Courts submit names of people convicted of felonies who lose their right to vote.

In Franklin County, people who are alive and registered but don't vote are removed after
sitting out eight years of elections.

Ohio's 2-year-old requirement that voters show identification at the polls makes it more important that they keep their registration information current, said Jeff Ortega, a spokesman for Secretary of State Jennifer Brunner.

Statewide, a grant from the Pew Charitable Trusts is paying to include voter-registration forms in post-office change-of-address kits. Damschroder said Franklin County voters who have filled out postal-address changes will get another reminder in the mail this summer to update their registration as well.

In 2004, the Ohio Republican Party challenged more than 31,000 newly registered voters statewide -- including more than 4,200 in Franklin County -- after letters it mailed out came back as undeliverable. The challenges fizzled, but Brunner fears a new state law requiring counties to mail their own notices to all registered voters could fuel another round of pre-election challenges.

William A. Anthony Jr., chairman of the Franklin County Democratic Party and vice-chair of the county elections board, said he also has noticed more challenges filed by new homeowners against previous occupants.

"I can see this being a residual problem because of the foreclosures," he said.

If it turns into a problem, it could extend well beyond Franklin County.

Columbus ranked 32nd among U.S. cities in the number of foreclosure filings during the first quarter of 2008, according to RealtyTrac, a Web site that lists homes on the market in most cities. Cleveland, Dayton, Akron, Toledo and Cincinnati also were among the top 50, and Ohio was ninth among states during May, with one filing for every 410 homes.

Other battleground states rank high in foreclosure filings as well: Nevada led the nation in May with one filing for every 118 homes, while Florida was fourth, Michigan fifth, Georgia sixth, Colorado seventh and New Jersey 10th.

Nathaniel Persily, a law professor at Columbia University, said Ohio is stricter than most states in using outdated registrations as grounds for disqualifying voters. But increasing numbers of outdated registrations increase the possibility of voter challenges in 2008, he said.

Few in central Ohio predict a repeat of 2004. Although pre-election challenges still are possible, state law now bars party challengers at polling places.

Franklin County GOP Chairman Doug Preisse didn't rule out challenges before Nov. 4. He said his party wants "clean, accurate voter lists" and remains suspicious of outside groups such as ACORN, the Association of Community Organizations for Reform Now, whose paid registration workers were accused in 2004 and 2006 of submitting names for people who don't exist.

As it did in 2004, the Ohio Democratic Party is putting together a "voter-protection" plan to fight eligibility challenges.