Jose Morales v. Karen Handel
USDC/NDGA/Atlanta
1:08-CV-3172 JTC

PART 3 OF 3
OF
EXHIBIT 4

VOTING RIGHTS SUBMISSION 2008-15
(PLUS ALL VRA EXHIBITS)
VRAG TRAINING

Voter Registration Enhancements

March 2008
Ralph Jones
Helpdesk Specialist
VRAG TRAINING

- DDS Application Process
- Verification Process
- VIC Field Process
- Absentee Application Field Process
- Attempted Registration Process
- Felon Maintenance Process
DDS Application Processing

SSVR0001-02  VOTER REGISTRATION  08/01/07 10:37 AM
CICSL1  VOTER MAINTENANCE  FULTON

ACTION: C (ACI)  REG NBR: 7000132  DL NBR: 000276774 STATUS: A ACTIVE
NAME: VIC:
L: CHUMLEY  F: HATTIE  M: LOGAN  S:
ADDR: 3756 KATHRYN DR  SUF: SW APT: BLDG:
CITY: ATLANTA  ZIP: 30331 - 5300  COUNTY: 60 FULTON
SS# : 2  BIRTH DATE: 01 11 1944 GENDER: F RACE: U LAND DIST: 14
REG DATE: 05 05 2007 STATUS DATE/REASON: 08/01/2007 LAND LOT: 207
SITE: 00001 PW: SSA: DDD APPL :
MAIL ADDR:

ADDITIONAL ADDR :  
CO PREC: 10E 10E  
MUNI PREC: 10E 10E  
DISTRICT COMBO: 56

**** PREVIOUS INFORMATION ****
NAME: CHUMLEY, HATTIE LOGAN
ADDR: 2771 COLLIER DR  NW  REG#: 7000132
CITY: ATLANTA  ST: GA ZIP: 303187265 COUNTY:
CHANGED BY: $0SSRMJ ON: 08/01/2007 ADDED BY: $0SSRMJ ON: 08/01/2007
NEXT SCREEN: (PF2=REF PF3=RET PF8=FWD PF10 AND PF11=CLIST ENTER=ACTION)
0000 - TO ACCEPT DDS ELECTRONIC APPL - Y / TO ENTER MANUALLY - N

Connected to Go-Screen.doas.state.ga.us port 23
If you type a Y for the AUTO DL field, the information will stay on the screen, but you will not be able to update the name, date of birth, DL#, and Social Security Number. You will be able to change any other important information concerning the voter.
DDS Application Processing

If you type an N for the AUTO DL field, the voter information will revert back to the original record. You will be able to update any field.
Why DDS Application Processing?

- Why DDS Application Processing?
- To capture the Driver’s License for every voter.
  - Unique identifier to every voter
  - Used for the verification process
- To clean up your DDS Application Report
  - SSVRC528
VERIFICATION PROCESS

• We will be confirming the voter’s information by verifying through DDS (Department of Driver’s Service). DDS verifies their information through SSA (Social Security Administration). The verification process confirms the following fields match.

• Last Name
• First Name
• Date Of Birth
• Last 4 digit of Social
• Driver’s License Number
• Citizenship
VERIFICATION PROCESS

When a new voter is added into the voter registration system, their record is sent to DDS for verification. If the voter information is verified or match, a ‘Y’ will appear in the SSA field on screen 2 the following day. If the voter did not verify, then the voter’s information is sent to the Document Direct report SSVRZ791 to show which fields prevented the SSA Field from displaying a ‘Y’.

---

For the voter registration record:

SSVR0001-02  VOTER REGISTRATION  07/25/07 09:16 PM
CICSL3  VOTER MAINTENANCE  FULTON

ACTION: 1 (ACI)  REG NBR: 495446  DL NBR: 049528705  STATUS: A ACTIVE
NAME: VIC:
L: KITCHENS-LAVERY  F: VALERIE  M: ELIZABETH  S:
ADDR: 1640 OAKFIELD LN  SUF: APT: BLDG:
CITY: ROSSBELL  ZIP: 30075 - 3018  COUNTY: 60 FULTON
SS# :  BIRTH DATE: 12 12 1969  GENDER: F RACE: W LAND DIST:
REG DATE: 02 16 2007  STATUS DATE/REASON:
CONTACT DATE/TYPE: 02 16 2007  XFR IDP: CORRECTION?  PRT PRECINCT CARD?
SITE: 00002  PW:  S Salem
MAIL ADDR:  APT:  PO/RR:
CITY:  ST:  ZIP:
ADDITIONAL ADDR :
CO PREC: RM08  RW08  MUNI PREC: RM08  RW08
DISTRICT COMBO: 125

**** PREVIOUS INFORMATION ****

NAME: ADDR: 2021 VICKSBURG TRL  REG#: 124411K
CITY: WOODSTOCK  ST: GA ZIP: 301893445  COUNTY: CHEROKEE
CHANGED BY: SSVRZ841 ON: 04/16/2007  ADDED BY: CONVERSIN ON: 03/20/1995
NEXT SCREEN:  (PF2=REF PF3=RET PF8=FWD PF10 AND PF11=CLIST ENTER=ACTION)
0054-YOUR INQUIRY WAS SUCCESSFUL.
# VERIFICATION PROCESS

<table>
<thead>
<tr>
<th>REC</th>
<th>LAST</th>
<th>NAME</th>
<th>DATE</th>
<th>LAST</th>
<th>FIRST</th>
<th>NAME</th>
<th>DOB</th>
<th>LAST4</th>
<th>DL</th>
<th>RL</th>
</tr>
</thead>
<tbody>
<tr>
<td>00469641</td>
<td>TAYLOR</td>
<td>MONIQUA</td>
<td>19340104</td>
<td>3432</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>00471449</td>
<td>TAYLOR</td>
<td>BILLY SHEIK</td>
<td>19540505</td>
<td>9653</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>00526628</td>
<td>CANADY</td>
<td>WILLIAM LUTHER</td>
<td>19420213</td>
<td>9912</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>00654519</td>
<td>SHURMAK</td>
<td>ROBERT</td>
<td>19661212</td>
<td>7555</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>00318996</td>
<td>WHITE</td>
<td>LISA LYNNE</td>
<td>19710710</td>
<td>4319</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>00692976</td>
<td>DHIMIS</td>
<td>SHERRIKA</td>
<td>19830923</td>
<td>5041</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>00674968</td>
<td>BRYANT</td>
<td>MARY KATHRYN</td>
<td>19860507</td>
<td>9192</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>007082076</td>
<td>MANNING</td>
<td>LEAH</td>
<td>19900204</td>
<td>9206</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>007084380</td>
<td>CHANDLER</td>
<td>STEVE</td>
<td>19701216</td>
<td>1216</td>
<td>N</td>
<td>N</td>
<td>N</td>
<td>N</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>007127078</td>
<td>EDGAR</td>
<td>LEAH</td>
<td>19890109</td>
<td>0641</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>007127374</td>
<td>PRIDGEN</td>
<td>GEORGE</td>
<td>19590726</td>
<td>6456</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>007127380</td>
<td>PRIDGEN</td>
<td>GEORGE</td>
<td>19290801</td>
<td>6924</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>007128449</td>
<td>FULTON</td>
<td>RAINA</td>
<td>19890204</td>
<td>8257</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>007137969</td>
<td>VICKERS</td>
<td>BROCK</td>
<td>19990310</td>
<td>3003</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>007135014</td>
<td>DOPPE</td>
<td>JAMES</td>
<td>19890626</td>
<td>0000</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
</tr>
<tr>
<td>007135077</td>
<td>TARRANT</td>
<td>ALOZO</td>
<td>19381129</td>
<td>7996</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
</tbody>
</table>
VERIFICATION PROCESS

During the verification process, it is determined if the voter is an U.S. citizen. When you inquire on a voter, a red blinking message “NON CITIZEN” appears if the voter is not a U.S. citizen.
VIC FIELD

• The purpose for the VIC (Voter ID Card) field is to capture the number of applications that were Rejected and Issued.

• It will also allow us to capture who are applying for the VIC and how many times each voter was issued a VIC.
**VIC FIELD**

Example of Reject VIC Entry

```
ACTION: C (ACI)  REG NBR: 6000000  DL NBR: 000000000 STATUS: A ACTIVE
NAME: __ VIC: 02 02 2007 *CONFORMATION NOTICE: NCOA - 04/04/2005
L: WADDELL F: JO M: ANN S: __
ADDR: 3306 NCCYER HONDS CIR SUF: MM APT: ___ BLDG: ___
CITY: ACWORTH ZIP: 30101 - 6691 COUNTY: 33 COBB
SS#: __ BIRTH DATE: 03 12 1967 GENDER: M RACE: __ LAND DIST: 20
REG DATE: 05 27 2004 STATUS DATE/REASON: 02/28/2006 ___ LAND LOT: 66
CONTACT DATE/TYPE: ___ ___ IDP: ___ CORRECTION? Y PRT PRECINCT CARD? N
SITE: ___ PH: ___
MAIL ADDR: ___ ___ ___ APT: ___ PO/RR: ___
CITY: ___ ___ ___ ST: ___ ZIP: ___
ADDITIONAL ADDR: ___ ___ ___
CO PREC: KE5B KENNESAW SB MUNI PREC: KE5B KENNESAW SB
DISTRICT COMBO: 249

**** PREVIOUS INFORMATION ****

NAME: ___
ADDR: ___
CITY: ___

CHANGED BY: #SSRMJ  ON: 07/20/2007  ADDED BY: #SSYMB  ON: 06/17/2004
NEXT SCREEN: ___ (PF2=REF PF3=RET PF8=FWD PF10 AND PF11=CLIST ENTER=ACTION)
0052-PRESS PF5 TO VERIFY.
```
VIC FIELD

Example of Issue VIC Entry
Absentee Application Field
Notice, we have a new field on the Absentee Ballot Maintenance Screen. This is used for tracking the absentee application. You can enter an “A” for accept or an “R” for reject.
Absentee Application Field

Go-Screen.doas.state.ga.us

SSVR0030-16 VOTER REGISTRATION 08/06/07 7:36 PM
CICSL1 ABSENTEE BALLOT MAINTENANCE CLAYTON
ACTION: A (ACID) REG NBR: 7091441 ELECTION NBR: 4 STATUS: A ACTIVE
NAME: L: PARKS F: HUELLON M: DANIEL S:
ADDR: 8886 CHANNING DR SUF: APT: BLDG:
CITY: JONESBORO ZIP: 30238 - 4722 COUNTY: 31 CLAYTON
SSN: 217179557 BIRTH DATE: 02 24 1976 GENDER: M RACE: W
REG DATE: 03 01 2007 COMBO: 338 COUNTY PREC: JB10 MUNI PREC:
---- ABSENTEE BALLOT -------
ELECTION DATE: 09 26 2007 ELECTION TYPE: 001 - GENERAL PRIMARY ELECTION
ABSENTEE ADDRESS: 8886 CHANNING DR JONESBORO GA 30238-4722
APPL (A/R): F
APPL RECEIVED DATE: 08 06 2007 REASON ISS: STYLE: ___
BALLOT ISS DATE: BALLOT NBR: PARTY: __
VOTED IN OFFICE: ERR/CAN/REJ/SPOIL: REASON:
RECEIVED DATE/TIME: ALL BALLOTS: SWAB: FWAB: ASST:
VOIDED BALLOT(S): & REASON(S)
CHG BY: ADD BY: REG: 0
NEXT SCREEN: (PF2=REF PF3=RET PF4=PTR PF6=ABS INQ PF9=R F10=LABEL PF11=S&C)
022-VOTER MASTER FOUND - ADD ABSENTEE DATA.
Absensee Application Field

You can press PF8 at any time to reveal the absentee application reject reason screen.

<table>
<thead>
<tr>
<th>SSVR0030-16</th>
<th>VOTER REGISTRATION</th>
<th>08/06/07 7:38 PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>CICS</td>
<td>ABSENTEE BALLOT MAINTENANCE</td>
<td>CLAYTON</td>
</tr>
<tr>
<td>ACTION: A (ACID)</td>
<td>REG NBR: 7091441</td>
<td>ELECTION NBR: 4</td>
</tr>
<tr>
<td>NAME:</td>
<td>LOCATION NBR: 0</td>
<td>MIDR:</td>
</tr>
<tr>
<td>L: PARK</td>
<td>SSVR1007</td>
<td>ABSENTEE APPLICATION REJECT REASON</td>
</tr>
<tr>
<td>ADDR: 8</td>
<td>1. NOT REGISTERED</td>
<td></td>
</tr>
<tr>
<td>CITY: J</td>
<td>2. LATE</td>
<td></td>
</tr>
<tr>
<td>SSN : 2</td>
<td>3. NO SIGNATURE</td>
<td></td>
</tr>
<tr>
<td>REG DAT</td>
<td>4. TOO EARLY</td>
<td></td>
</tr>
<tr>
<td>ELECTIO</td>
<td>5. SIGNATURE DOES NOT MATCH</td>
<td></td>
</tr>
<tr>
<td>ABSENTE</td>
<td>6. WRONG INFO / NAME, ADDRESS, DOB</td>
<td></td>
</tr>
<tr>
<td>APPL (A</td>
<td>7. DID NOT COMPLETE OWN APPLICATION</td>
<td></td>
</tr>
<tr>
<td>APPL RE</td>
<td>8. NOT COMPLETED</td>
<td></td>
</tr>
<tr>
<td>BALLOT</td>
<td>9. PARTY NOT INDICATED</td>
<td></td>
</tr>
<tr>
<td>VOTED I</td>
<td>10. UNCLEAR ELECTION REQUEST</td>
<td></td>
</tr>
<tr>
<td>RECVD D</td>
<td>11. INVALID REASON GIVEN</td>
<td></td>
</tr>
<tr>
<td>VOIDED</td>
<td>12. REGISTERED IN DIFFERENT COUNTY</td>
<td></td>
</tr>
<tr>
<td>&amp; REAS</td>
<td>13. REASON NOT MARKED</td>
<td></td>
</tr>
<tr>
<td>CHG BY:</td>
<td>MAKE SELECTIONS AND PRESS FF3 - EXIT</td>
<td></td>
</tr>
<tr>
<td>NEXT SC</td>
<td>0</td>
<td></td>
</tr>
</tbody>
</table>
Attempted Registration Field

• Purpose

• To identify and track an existing voter who attempted to register in another county.
Attempted Registration Field Process

• A voter is registering in your county from another county.
• The voter’s application was missing critical information.
• The application should be treated as a pending application.
• A letter should be sent to the voter to obtain this information.
Attempted Registration Field

- If the voter does not respond within 30 days, notify the voter in writing that the application has been rejected.
- Update the Attempt Registration Field
Attempted Registration

First you change the voter.

Then hit shift F3 to get the prompt displayed.
Attempted Registration
Felon List Maintenance

• We have recently gained access to the electronic felon records from the Department of Corrections.

• Our first run of matches included the whole database from the Department of Corrections.
Felon List Maintenance

- Felon List Reports
- SSVRZ933R1-8
- SSVRZ933S1-8
Felon List Maintenance

- We ask that you look at these reports and determine if they are a “match” and update the voter to deleted status with the reason of “Felon”.
- Since we do not have legislative approval, we are not able to systematically move any voters to delete status.
Felon List Maintenance

• If the voter commits another felon, their name will appear on the reports again. Please update the voter by retyping "Felon" in the status field.

• The report names are ssvrz933r1-r8 and ssvrz933s1-s9.
Felon List Maintenance

• We will need to get approval through legislation to discontinue receiving the hardcopy felon list from the clerk of the superior courts. We will continue to send the supporting documents for your files, but you can use the felon reports to update your voter records.
<table>
<thead>
<tr>
<th>DL NBR</th>
<th>POS HRK</th>
<th>LAST NAME</th>
<th>FIRST NAME</th>
<th>DATE OF BIRTH</th>
<th>LAST 4 SSN</th>
<th>LAST NAME MATCH</th>
<th>FIRST NAME MATCH</th>
<th>ZIP</th>
<th>MATCH</th>
<th>DLE</th>
<th>LAST 4 DLE</th>
<th>DLE MATCH</th>
<th>DLE ZIP</th>
<th>DLE RESPONSE</th>
<th>DESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>03230202 22</td>
<td>67</td>
<td>BIAN</td>
<td>BIAN</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03261266 36</td>
<td>57</td>
<td>CHRISTOPHER</td>
<td>CHRISTOPHER</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>05089497 44</td>
<td>56</td>
<td>SYLVESTER</td>
<td>SYLVESTER</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03269692 28</td>
<td>59</td>
<td>GANEM</td>
<td>GANEM</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03293841 92</td>
<td>60</td>
<td>CARMAKRA</td>
<td>CARMAKRA</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03294416 125</td>
<td>61</td>
<td>RICHARD</td>
<td>RICHARD</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03266472 25</td>
<td>62</td>
<td>SALVATORE</td>
<td>SALVATORE</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03267343 43</td>
<td>63</td>
<td>KRIEG</td>
<td>KRIEG</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03276718 35</td>
<td>64</td>
<td>SAILANAN</td>
<td>SAILANAN</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03276438 56</td>
<td>65</td>
<td>GODONGU</td>
<td>GODONGU</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03276562 62</td>
<td>66</td>
<td>CEM</td>
<td>CEM</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03276587 17</td>
<td>67</td>
<td>THURBERK</td>
<td>THURBERK</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03276591 93</td>
<td>68</td>
<td>CHEUMARAT</td>
<td>CHEUMARAT</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03276796 45</td>
<td>69</td>
<td>KHC</td>
<td>KHC</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03276829 39</td>
<td>70</td>
<td>VERTY</td>
<td>VERTY</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03276927 66</td>
<td>71</td>
<td>CHRISTINA</td>
<td>CHRISTINA</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03276653 63</td>
<td>72</td>
<td>CLAUDIA</td>
<td>CLAUDIA</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03281054 25</td>
<td>73</td>
<td>MARLENE</td>
<td>MARLENE</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03293312 32</td>
<td>74</td>
<td>RACHEL</td>
<td>RACHEL</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03293472 32</td>
<td>75</td>
<td>BISHOP</td>
<td>BISHOP</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03293549 49</td>
<td>76</td>
<td>CLERIA</td>
<td>CLERIA</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03293615 14</td>
<td>77</td>
<td>FLORENCE</td>
<td>FLORENCE</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03293667 67</td>
<td>78</td>
<td>CLAUDIA</td>
<td>CLAUDIA</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03293734 36</td>
<td>79</td>
<td>BRENDAUGL</td>
<td>BRENDAUGL</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03293833 93</td>
<td>80</td>
<td>STUDE</td>
<td>STUDE</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03294085 45</td>
<td>81</td>
<td>VINAL</td>
<td>VINAL</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>03294084 46</td>
<td>82</td>
<td>DIO</td>
<td>DIO</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>DL</td>
<td>ARC</td>
<td>LAST NAME</td>
<td>FIRST NAME</td>
<td>DATE OF BIRTH</td>
<td>LAST 4 SSN</td>
<td>SSA MATCH</td>
<td>FIRST NAME</td>
<td>LAST 4 SSN</td>
<td>DOB</td>
<td>LAST 4 DL</td>
<td>CITIZEN</td>
<td>RESPONSE CODE</td>
<td>DESCRIPTION</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-----</td>
<td>-----</td>
<td>-----------</td>
<td>-------------</td>
<td>---------------</td>
<td>------------</td>
<td>------------</td>
<td>------------</td>
<td>------------</td>
<td>-----</td>
<td>-----------</td>
<td>----------</td>
<td>----------------</td>
<td>--------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07144299</td>
<td>ZEMICH</td>
<td>GERMANA</td>
<td>ZAKHARIEV</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07150506</td>
<td>SAJIE</td>
<td>MAGNUR</td>
<td>ELGINA</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07165359</td>
<td>BROCHE</td>
<td>ELMA</td>
<td>ELLEN</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07165368</td>
<td>RUGOSKE</td>
<td>RYAN</td>
<td>RICHARD</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07173339</td>
<td>HORST</td>
<td>SANDRA</td>
<td>SHERRY</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07173874</td>
<td>WICKER</td>
<td>MARY</td>
<td>CAROL</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07194378</td>
<td>RUSH</td>
<td>COURTNEY</td>
<td>ANGELA</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07194379</td>
<td>RUSH</td>
<td>COURTNEY</td>
<td>ANGELA</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07194499</td>
<td>RUSH</td>
<td>COURTNEY</td>
<td>ANGELA</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07195566</td>
<td>ZHANG</td>
<td>LHI</td>
<td>LINDA</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07195611</td>
<td>COUSINS</td>
<td>MARIA</td>
<td>MARILYN</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07197822</td>
<td>FLORES</td>
<td>MARIANO</td>
<td>MAURICE</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07203544</td>
<td>PEACOCK</td>
<td>ANDERSON</td>
<td>ARTHUR</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07204273</td>
<td>ADAMS</td>
<td>RICHARD</td>
<td>RICHARD</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07205548</td>
<td>HARRISON</td>
<td>WILLIAM</td>
<td>WILLIAM</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07205797</td>
<td>KHAN</td>
<td>LISA</td>
<td>LISA</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07205802</td>
<td>LAVRIN</td>
<td>PAUL</td>
<td>PAUL</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07205803</td>
<td>RICK</td>
<td>ISIDRO</td>
<td>ISIDRO</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07205804</td>
<td>DIAS</td>
<td>ARMANDO</td>
<td>ARMANDO</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07205805</td>
<td>DOUGAN</td>
<td>ANGE</td>
<td>ANGE</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07205806</td>
<td>GALAKA</td>
<td>ARTURO</td>
<td>ARTURO</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07205807</td>
<td>ZICKE</td>
<td>ENRIQUE</td>
<td>ENRIQUE</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07205808</td>
<td>GREEN</td>
<td>BOBBY</td>
<td>BOBBY</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07205809</td>
<td>HERRENS</td>
<td>ENRIQUE</td>
<td>ENRIQUE</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07205810</td>
<td>SULLIVAN</td>
<td>MICHAEL</td>
<td>MICHAEL</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07205811</td>
<td>PARK</td>
<td>JIM</td>
<td>JIM</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07205812</td>
<td>ONDERIN</td>
<td>SANTIAGO</td>
<td>SANTIAGO</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07206013</td>
<td>DELIA</td>
<td>JOAN</td>
<td>JOAN</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07206014</td>
<td>HUGHES</td>
<td>IRIS</td>
<td>IRIS</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07206015</td>
<td>HAYES</td>
<td>EVAN</td>
<td>EVAN</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07206016</td>
<td>HARDIN</td>
<td>LAToya</td>
<td>LAToya</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07206017</td>
<td>HOYER</td>
<td>DANNY</td>
<td>DANNY</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07206018</td>
<td>MENNE</td>
<td>STEVEN</td>
<td>STEVEN</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07206019</td>
<td>ZERGER</td>
<td>WILLIAM</td>
<td>WILLIAM</td>
<td>Y Y Y Y Y Y Y Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>DL NBR</td>
<td>RNG NBR</td>
<td>LAST NAME</td>
<td>FIRST NAME</td>
<td>DATE OF BIRTH</td>
<td>LAST NAME SSN MATCH</td>
<td>FIRST NAME MATCH</td>
<td>DOB MATCH</td>
<td>DL MATCH</td>
<td>CIB-9 RESPONSE DESCRIPTION</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>--------</td>
<td>---------</td>
<td>-----------</td>
<td>------------</td>
<td>---------------</td>
<td>---------------------</td>
<td>------------------</td>
<td>----------</td>
<td>----------</td>
<td>----------------------------</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07446066</td>
<td>ANDREWS</td>
<td>JOEL</td>
<td>CLAYTON</td>
<td>Y Y Y Y Y N Y</td>
<td>Y Y Y Y Y N Y</td>
<td>Y Y Y Y Y N Y</td>
<td>Y Y Y Y Y N Y</td>
<td>Y Y Y Y Y N Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>DL#</td>
<td>SSN</td>
<td>FIRST NAME</td>
<td>LAST NAME</td>
<td>DATE OF BIRTH</td>
<td>SSA</td>
<td>Match</td>
<td>Match</td>
<td>Match</td>
<td>Match</td>
<td>Match</td>
<td>Match</td>
<td>RESPONSE CODE</td>
<td>DESCRIPTION</td>
<td></td>
<td></td>
</tr>
<tr>
<td>------</td>
<td>-------------</td>
<td>------------</td>
<td>-----------</td>
<td>---------------</td>
<td>-----</td>
<td>-------</td>
<td>-------</td>
<td>-------</td>
<td>-------</td>
<td>-------</td>
<td>-------</td>
<td>----------------</td>
<td>-------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07547024</td>
<td>HERNANDEZ</td>
<td>JOSE</td>
<td>HERNANDEZ</td>
<td>Y Y Y Y N Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07544438</td>
<td>GRIMM</td>
<td>MARK</td>
<td>GRIMM</td>
<td>Y Y Y Y N Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07550493</td>
<td>TAYLOR</td>
<td>SHIRL</td>
<td>TAYLOR</td>
<td>Y Y Y Y N Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07550356</td>
<td>BURKH</td>
<td>NICHOLAS</td>
<td>BURKH</td>
<td>Y Y Y Y N Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07541259</td>
<td>LONDON</td>
<td>LINDA</td>
<td>LONDON</td>
<td>Y Y Y Y N Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07541729</td>
<td>BOSCH</td>
<td>ANNA</td>
<td>BOSCH</td>
<td>Y Y Y Y N Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07541737</td>
<td>SUN</td>
<td>MICHAEL</td>
<td>SUN</td>
<td>Y Y Y Y N Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07541739</td>
<td>MULLER</td>
<td>DAVID</td>
<td>MULLER</td>
<td>Y Y Y Y N Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07541744</td>
<td>MEERKINS</td>
<td>MARILYN</td>
<td>MEERKINS</td>
<td>Y Y Y Y N Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07549324</td>
<td>KELLEY</td>
<td>CATHERINE</td>
<td>KELLEY</td>
<td>Y Y Y Y N Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07549226</td>
<td>KELLEY</td>
<td>CATHERINE</td>
<td>KELLEY</td>
<td>Y Y Y Y N Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07549223</td>
<td>KELLEY</td>
<td>CATHERINE</td>
<td>KELLEY</td>
<td>Y Y Y Y N Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07549262</td>
<td>KELLEY</td>
<td>CATHERINE</td>
<td>KELLEY</td>
<td>Y Y Y Y N Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07549232</td>
<td>KELLEY</td>
<td>CATHERINE</td>
<td>KELLEY</td>
<td>Y Y Y Y N Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07549225</td>
<td>KELLEY</td>
<td>CATHERINE</td>
<td>KELLEY</td>
<td>Y Y Y Y N Y N</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>DL</td>
<td>RCN</td>
<td>RBR</td>
<td>LAST NAME</td>
<td>FIRST NAME</td>
<td>DATE OF BIRTH</td>
<td>LAST 4 DSSN</td>
<td>FIRST 4 DSSN</td>
<td>LAST NAME</td>
<td>FIRST NAME</td>
<td>MATCH</td>
<td>MATCH</td>
<td>MATCH</td>
<td>MATCH</td>
<td>MATCH</td>
<td>MATCH</td>
</tr>
<tr>
<td>----</td>
<td>-----</td>
<td>-----</td>
<td>-----------</td>
<td>------------</td>
<td>--------------</td>
<td>------------</td>
<td>-------------</td>
<td>-----------</td>
<td>------------</td>
<td>--------</td>
<td>--------</td>
<td>--------</td>
<td>--------</td>
<td>--------</td>
<td>--------</td>
</tr>
<tr>
<td>07545207</td>
<td>39</td>
<td>4927</td>
<td>CAJUARE</td>
<td>TRIPITI</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>H</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07544561</td>
<td>44</td>
<td>3101</td>
<td>LESCO</td>
<td>RITA FANTIA</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>H</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07545408</td>
<td>1</td>
<td>4590</td>
<td>CHELLAVI</td>
<td>RIMM</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>H</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07544387</td>
<td>160</td>
<td>2220</td>
<td>GUPTA</td>
<td>AYUL</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>H</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07544393</td>
<td>66</td>
<td>4733</td>
<td>HENRY</td>
<td>OCTAVIA</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>H</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07545211</td>
<td>93</td>
<td>2591</td>
<td>WALKER</td>
<td>NINJERVA</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>H</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07545323</td>
<td>120</td>
<td>4003</td>
<td>BARRY</td>
<td>VETERA</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>H</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07546054</td>
<td>280</td>
<td>4888</td>
<td>ICCHER</td>
<td>LATTIE</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>H</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07545977</td>
<td>111</td>
<td>5277</td>
<td>SMITH</td>
<td>KELLY</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>H</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07545881</td>
<td>331</td>
<td>1458</td>
<td>BALUZ</td>
<td>ISLANDA</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>H</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07546820</td>
<td>280</td>
<td>1245</td>
<td>GEAREY</td>
<td>MARIA</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>H</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07545882</td>
<td>331</td>
<td>1458</td>
<td>FLORES</td>
<td>VALENTIA</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>H</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07546828</td>
<td>55</td>
<td>4233</td>
<td>MATHIEN</td>
<td>VIRGINIA</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>H</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07546899</td>
<td>55</td>
<td>4233</td>
<td>MATHIEN</td>
<td>VIRGINIA</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>H</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07546900</td>
<td>111</td>
<td>5277</td>
<td>MILLER</td>
<td>ISLANDA</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>H</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07546901</td>
<td>111</td>
<td>5277</td>
<td>MILLER</td>
<td>VALENTIA</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>H</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07546902</td>
<td>111</td>
<td>5277</td>
<td>MILLER</td>
<td>VALENTIA</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>H</td>
<td></td>
<td></td>
</tr>
<tr>
<td>07546903</td>
<td>111</td>
<td>5277</td>
<td>MILLER</td>
<td>VALENTIA</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>H</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

This list includes full names, dates of birth, Social Security numbers, and other details for an unspecified number of individuals. The table also indicates a matching process for some details, possibly in the context of voter registration or similar administrative processes.
| DL NBR | KG NBR | LAST NAME | FIRST NAME | DATE OF BIRTH | LAST4 SSN | SSA MATCH | LAST NAME | FIRST NAME | DOB MATCH | LAST5 SSN | SSA MATCH | MATCH CITIZEN | RESPONSE | CODE | DESCRIPTION |
|--------|--------|-----------|------------|---------------|-----------|-----------|-----------|------------|------------|------------|-----------|-----------|--------------|----------|------|-------------|
| 07614615 | 0000 | WONG | MARCIA | Y Y Y Y N | N | N | WONG | MARCIA | N | N | N | Y | N |
| 07615429 | 0000 | WAPPLES | SUNIL | Y Y Y Y N | N | N | WAPPLES | SUNIL | N | N | N | Y | N |
| 07616201 | 0000 | BROWN | GEORGE | Y Y Y Y N | N | N | BROWN | GEORGE | N | N | N | Y | N |
| 07628993 | 0000 | GREYSON | RAVI | Y Y Y Y N | N | N | GREYSON | RAVI | N | N | N | Y | N |
| 07628703 | 0000 | RONEE | MARVIN | Y Y Y Y N | N | N | RONEE | MARVIN | N | N | N | Y | N |
| 07628905 | 0000 | VAIKURALI | SOMNATH | Y N Y Y N | N | N | VAIKURALI | SOMNATH | N | N | N | Y | N |
| 07628317 | 0000 | TAYLOR | WILLIAM | Y Y Y Y N | N | N | TAYLOR | WILLIAM | N | N | N | Y | N |
| 07628720 | 0000 | CHAUD | KALPANA | Y Y Y Y N | N | N | CHAUD | KALPANA | N | N | N | Y | N |
| 07627411 | 0000 | SINGH | GLADNA | Y Y Y Y N | N | N | SINGH | GLADNA | N | N | N | Y | N |
| 07627426 | 0000 | KANO | RAMDA | Y Y Y Y N | N | N | KANO | RAMDA | N | N | N | Y | N |
| 07627427 | 0000 | ABDIPOL | ADOLPA | Y Y Y Y N | N | N | ABDIPOL | ADOLPA | N | N | N | Y | N |
| 07627439 | 0000 | SOMNATH | AVINASH | Y Y Y Y Y | N | N | SOMNATH | AVINASH | Y Y Y Y Y | N | N | Y | N |
| 07627439 | 0000 | AGACHE | ADITYA | Y Y Y Y Y | N | N | AGACHE | ADITYA | Y Y Y Y Y | N | N | Y | N |
| 07628949 | 0000 | GARCIA | MUSKIN | Y N Y N Y | N | N | GARCIA | MUSKIN | Y N Y N Y | N | N | Y | N |
| 07633978 | 0000 | LIPER | DAVID | Y Y Y Y N | N | N | LIPER | DAVID | Y Y Y Y N | N | N | Y | N |
| 07642092 | 0000 | POSU | GEORGE | Y N Y Y N | N | N | POSU | GEORGE | Y N Y Y N | N | N | Y | N |
| 07642629 | 0000 | VOMO | DEEKY | Y Y Y Y N | N | N | VOMO | DEEKY | Y Y Y Y N | N | N | Y | N |
| 07643710 | 0000 | RODRIGUEZ | JEFFREY | Y Y Y Y N | N | N | RODRIGUEZ | JEFFREY | Y Y Y Y N | N | N | Y | N |
| 07644442 | 0000 | ROMEI | RAPHEL | Y Y Y Y N | N | N | ROMEI | RAPHEL | Y Y Y Y N | N | N | Y | N |
| 07644941 | 0000 | ROMO-LEHERON | ANGELO | Y N Y Y Y | N | N | ROMO-LEHERON | ANGELO | Y N Y Y Y | N | N | Y | N |
| 07649711 | 0000 | RONG-LEHERON | PETER | Y Y Y Y Y | N | N | RONG-LEHERON | PETER | Y Y Y Y Y | N | N | Y | N |
| 07657215 | 0000 | FINNIE | DUSTIN | Y Y Y Y N | N | N | FINNIE | DUSTIN | Y Y Y Y N | N | N | Y | N |
| 07656404 | 0000 | DENNIE | LARA | Y Y Y Y N | N | N | DENNIE | LARA | Y Y Y Y N | N | N | Y | N |
| 07667279 | 0000 | RAPIT | LARA | Y Y Y Y N | N | N | RAPIT | LARA | Y Y Y Y N | N | N | Y | N |
| 07667349 | 0000 | GAONA | XCHITIL | Y Y Y Y Y | N | N | GAONA | XCHITIL | Y Y Y Y Y | N | N | Y | N |
| 07688526 | 0000 | CHANEK | MARIA | Y Y Y Y N | N | N | CHANEK | MARIA | Y Y Y Y N | N | N | Y | N |
| 07688536 | 0000 | MONTO | YVETOS | Y Y Y Y N | N | N | MONTO | YVETOS | Y Y Y Y N | N | N | Y | N |
| 07689336 | 0000 | BROWN | OLIVE | Y Y Y Y N | N | N | BROWN | OLIVE | Y Y Y Y N | N | N | Y | N |
| 07699239 | 0000 | HELADEN | SARA | Y Y Y Y Y | N | N | HELADEN | SARA | Y Y Y Y Y | N | N | Y | N |
| 07699255 | 0000 | OLIGHOUNONG | AKERE | Y Y Y Y Y | N | N | OLIGHOUNONG | AKERE | Y Y Y Y Y | N | N | Y | N |
| 07701551 | 0000 | WODDANYAM | ASEKES | Y Y Y Y Y | N | N | WODDANYAM | ASEKES | Y Y Y Y Y | N | N | Y | N |
September 25, 2008

«FIRST» «LAST»
«ADDRESS»
«CITY», «ST» «ZIP»

Dear «FIRST» «LAST»:

We received notification that you may not be qualified to vote in Cobb County, Georgia because you may not be a U.S. citizen. The information came from an automated verification system that may possibly produce errors.

Pursuant to O. C. G. A. 21-2-228, a HEARING has been set for Monday, October 13, 2008, at 4:00 p.m. to hear evidence on this matter. This HEARING is set before the Cobb County Board of Elections and Registration who will meet on this date in the Conference Room at West Park Government Center, 736 Whitlock Avenue, Marietta, Georgia.

If you do not wish to attend the HEARING, you may provide a copy of one of the items on the enclosed list by U.S. Mail or in person prior to the HEARING. Our office hours are Monday through Friday, 8:00 AM to 5:00 PM.

If we do not hear from you prior to the hearing, and you do not attend the hearing, your name will be removed from the list of registered voters and YOU WILL NOT BE ALLOWED TO VOTE.

If you have any questions, please contact me at 770/528-2311.

Sincerely,

Beth Kish
Registration Manager
Beth.Kish@cobbcounty.org

Enc.

EXHIBIT "B-5"
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JOSE MORALES, on behalf of himself and those similarly situated
Plaintiff,

v.

KAREN HANDEL, in her official Capacity as Georgia Secretary of State,
Defendant.

CIVIL ACTION
FILE NO. __________

COMPLAINT FOR
DECLARATORY AND INJUNCTIVE RELIEF
-- CLASS ACTION

PRELIMINARY STATEMENT

1. This action challenges new voter registration list maintenance procedures involving citizen checks, which serve as triggers for other new procedures regarding absentee voting and voter challenge hearings in the State of Georgia, and it seeks declaratory relief and temporary and permanent injunctive relief pursuant to Fed. R. Civ. P. 65 to halt the continued use of these voting procedures in advance of the November 4, 2008 election, and to require that appropriate immediate remedial measures are taken to ensure that all qualified and eligible voters in the State of Georgia have access to the ballot on Election Day.

2. Plaintiff has no plain, speedy, or adequate remedy at law other than the relief requested in this Complaint. Unless enjoined by this Court, the new

EXHIBIT "C"
voter registration list maintenance procedures involving citizen checks and the
other related procedures regarding absentee voting and voter challenge hearings in
the State of Georgia, will continue to impermissibly burden qualified and eligible
citizens’ rights to vote in Georgia.

REQUEST FOR THREE-JUDGE PANEL

3. Plaintiff requests that Count 1 of this Complaint, the Section 5
enforcement claim, be heard and determined by a court of three judges in

JURISDICTION

4. Jurisdiction is based upon 28 U.S.C. §§ 1343a (3) & (4) and upon 28
1973gg-6. Jurisdiction for Plaintiff’s claim for declaratory relief is based upon 28
U.S.C. §§ 2201 and 2202. Jurisdiction for Plaintiffs’ claim for attorneys fees is

5. Venue is proper in this court under 28 U.S.C. § 1391(b).

PARTIES

6. Plaintiff Jose Julian Morales is a resident of Cherokee County,
Georgia. Mr. Morales is a U.S. Citizen and a legally registered Georgia elector.
Mr. Morales is Latino.
7. Defendant Karen Handel is Secretary of State of Georgia and is sued in her official capacity. The Secretary of State is the chief election officer of Georgia, and as such, is responsible for the administration of state laws affecting voting, and for assuring that elections in the State are conducted in accordance with law. The Secretary maintains the official list of registered voters for Georgia and is required to conduct the training of voter registrars and superintendents of election; O.C.G.A. § 21-2-50, specifically § 21-2-50(a)(11) and (14). The Secretary’s principal office is in Atlanta, Georgia.

STATEMENT OF FACTS AND LAW

The Help America Vote Act of 2002


9. In order to improve the accuracy and reliability of voter registration lists, HAVA requires that all states that conduct voter registration, including the State of Georgia, implement a single, statewide, computerized database of registered voters. 42 U.S.C. § 15483(a)(1)(A).

10. HAVA specifies minimum standards that each state, including the State of Georgia, must adhere to when creating and maintaining its statewide,
computerized database of registered voters. These standards include: "the name of each registered voter [must] appear[] in the computerized list." 42 U.S.C. § 15483(a)(1)(B)(i); "only voters who are not registered or who are not eligible to vote [may be] removed from the computerized list." 42 U.S.C. § 5483(a)(1)(B)(ii); and each state must implement "[s]afeguards to ensure that eligible voters are not removed in error from the official list of eligible voters." 42 U.S.C. § 15483(a)(4)(B).

11. With regard to voter removal, HAVA further specifies that states subject to the National Voter Registration Act, including the State of Georgia, may remove individuals from the registration list only "in accordance with the provisions of the National Voter Registration Act." 42 U.S.C. § 15483(a)(2)(A)(i).

12. HAVA specifically recognizes that states, including the State of Georgia, retain substantial discretion in making "specific choices on the methods of complying with the requirements of this statute." 42 U.S.C. § 15485.

13. To facilitate state efforts to remove duplicate registration records for the same individual from the statewide registration database, HAVA requires that states, including the State of Georgia, implement a two-step procedure.

14. First, states are to assign "a unique identifier [in the database]... to each legally registered voter in the State." 42 U.S.C. § 15483(a)(1)(A)(iii). The
identifier is either: (a) the registrant’s driver’s license number; (b) the last four
digits of the registrant’s social security number for those applicants without a
driver’s license, or (c) another number generated by the state for those who lack
both a driver’s license and a social security number. 42 U.S.C. § 15483(a)(5)(A).

15. Second, in order to make sure that the identifying numbers are
correctly entered into the registration database, states must “coordinate” their voter
registration database with the state driver’s license database and the Social Security
Administration database by attempting to match each registration record with a
record in one of the two other databases. 42 U.S.C. §§ 15483(a)(1)(A)(iv) &
15483(a)(5)(B).

16. However, HAVA generally does not require that states, including the
State of Georgia, utilize the aforementioned database matching to test or otherwise
evaluate the eligibility to vote of citizens who seek to register to vote in their state
of residence. The only exception, according to HAVA, are first-time voters who
register to vote by mail, who generally under HAVA must provide certain
documentary identification in order to vote, but are excused from that requirement
if the state is able to successfully match their registration record with a driver’s
license or social security record. 42 U.S.C. § 15483(b).
17. Instead, as determined by the Eleventh Circuit Court of Appeals in *Florida State Conference of the NAACP v. Browning*, 522 F.3d 1153 (2008), Georgia and other states subject to HAVA have the discretion to decide, as a threshold matter, whether to use database matching to evaluate voter eligibility. Likewise, if a state does decide to use database matching for that purpose, the specific standards and procedures that will be implemented are left to the discretion of the state. As stated by the Eleventh Circuit, “[t]here is nothing at all in [HAVA] that discusses the requirements and procedures for establishing eligibility and identity of in-person registrants.” *Id.* at 1155.

**The State of Georgia’s Implementation of Database Matching for Registered Voters**

18. Following the enactment of HAVA, the State of Georgia initially declined to implement a procedure for matching registration records with driver’s license or social security records, asserting that it was covered by an exception to that requirement included in HAVA. 42 U.S.C. § 15483(a)(5)(D). However, the Eleventh Circuit Court of Appeals subsequently held that this exception did not apply to Georgia. *Schwier v. Cox*, 439 F.3d 1285 (2006).

19. On April 23, 2007, the United States Department of Justice, which has enforcement authority under HAVA, wrote to the Georgia Secretary of State to
inquire about the state’s apparent continuing failure to implement the database matching requirements of HAVA.

20. On May 23, 2007, the Office of the Georgia Attorney General responded by letter to the U.S. Department of Justice, advising that state was in compliance with a consent order entered in the Schwier litigation and that the state was in compliance with HAVA’s database matching requirement.

21. Immediately prior to this exchange of correspondence, in March 2007, the Georgia Secretary of State and the Georgia Department of Driver Services (DDS) entered into an agreement to permit the Secretary of State to attempt to match individual records in the statewide registration database with driver’s license records. Approximately a month later, on April 23, 2007, a user agreement was finalized between the Georgia Department of Driver Services and the Social Security Administration to allow state officials to also seek to match registration records with records included in the Social Security Administration database.

**The State of Georgia’s Implementation of Database Matching for Registered Voters**

**Class Action Allegations**

22. This action is maintainable as a class action under Rule 23(a), (b)(1) and (b)(2), F.R.Civ.P.
23. The plaintiff class is defined as: Citizens of the United States and residents of the State of Georgia who have timely submitted a voter registration form and have been or will in the future be flagged as non-citizens during the citizenship status check performed using the databases maintained by both the Georgia Department of Driver Services and the federal Social Security Administration. On information and belief, the class is believed to consist of no less than 2,000 individuals.

24. Plaintiff is an adequate representative of the class. He presents typical claims of class members, has no conflicts with class members, and is represented by experienced counsel.

25. Adjudications with respect to the individual class members would create a risk that of an outcome that would substantially impair the ability of class members to protect their interests.

26. The defendant has acted and refused to act on grounds that apply generally to the class.

27. The questions of fact common to the class include, without limitation, the following:

(a) whether the Defendant obtained preclearance from either the United States Attorney General or the United States District Court for the District of Columbia
for its actions taken related to its voter registration database, including verifying
voter information against databases maintained by both the Georgia Department of
Driver Services and the federal Social Security Administration, and generating and
distributing reports of the results of those checks to county registrars as the basis
for voter challenges, hearings, correspondence or removal; and
(b) whether the Defendant is performing a list maintenance program by
systematically checking the citizenship of at least some registered voters and
directing counties to take action against those who are flagged within 90 days of
the November 4, 2008 federal election;

28. Questions of law common to the class include, without limitation, the
following:
(a) whether defendant’s actions violate Section 5 of the Voting Rights Act, 42
U.S.C. § 1973c; and
(b) whether defendant’s actions violate the National Voter Registration Act, 42

The State of Georgia’s Use of Database Matching to Attempt to Verify that Certain Registrants are United States Citizens and Thus Are Eligible to Vote in Georgia

9
29. The State of Georgia requires that, in order to vote in any election conducted in that state, an individual must be a citizen of the United States. O.C.G.A. § 21-2-216.

30. The State of Georgia assigns to its county boards of registrars the responsibility for determining the eligibility to vote of each person who applies to register to vote in the state. O.C.G.A. § 21-2-226(a). However, Georgia statutes do not specify any standards that shall be used by county boards of registrars to identify any particular class of registration applicants whose eligibility to vote should receive special scrutiny. Likewise, Georgia statutes do not specify the procedures that should be followed by county boards of registrars if and when it is decided that the eligibility to vote of a particular class of registrants should be specially scrutinized. O.C.G.A. §§ 21-2-226(a), 21-228.

31. When individuals in the State of Georgia apply for a driver’s license, they are required by state law to advise the Georgia Department of Driver Services whether they have United States citizenship at that time. This information is included in the driver’s license database maintained by the Department of Driver Services.

32. Individuals who become naturalized United States citizens after obtaining a Georgia driver’s license are neither required nor requested to advise the
Georgia Department of Driver Services of their changed citizenship status until they apply for a driver’s license renewal when, at that time, the citizenship information in the Department’s database is updated. Accordingly, the driver’s license database maintained by the Department includes inaccurate citizenship information on a portion of those state residents who are naturalized United States citizens.

33. Beginning on a date in or after March 2007, state officials have implemented database matching between the state registration database and the driver’s license database so as to identify those individuals whose records are matched in the two databases and who are displayed as being a non-citizen in the driver’s license database. The matching process yields computer printouts that identify individuals who meet these criteria.

34. On a date in or after March 2007, the Georgia Secretary of State directed all county election officials to begin to utilize the aforementioned computer printouts as a means for targeting individuals whose eligibility to vote should be reviewed. Further, the Secretary of State directed all county election officials that, if such a review is not undertaken prior to the time that a putative non-citizen registrant applies to vote absentee or appears at the polls to vote on election day, the registrant shall not be permitted to cast a regular ballot unless the
county registrar confirms that the individual is a United States citizen. If the registrar does not confirm citizenship, the voter then is required to cast a "challenged" ballot.

35. The Georgia Secretary of State has not instituted uniform state procedures which are to be utilized by county boards of registrars in evaluating whether individuals whose names appear on the aforementioned computer printouts are United States citizens. The Secretary of State also has not specified the documentation that may be produced by such an individual in order to prove citizenship (instead, the Secretary has simply advised the boards, as a point of information, of the different documents that the United States Citizen and Immigration Services, and the United States Department of Health and Human Services, view as acceptable proof of United States Citizenship).

**Guidance from the Georgia Secretary of State**

36. A Memorandum issued on September 12, 2008 from the Elections Division Director in the Office of the Secretary of the State to all County Elections Officials explained that each new voter registrant’s information will be entered into the Defendant’s statewide voter registration system. The Memorandum further stated that no newly registered voter would be considered as "registered" to vote until the statewide system has performed a citizenship status check on the voter
registrant. The status check consists of matching the registrant’s information with the “DDS” database for verification of each applicant’s citizenship status through the Social Security Administration.

37. A Memorandum issued on September 24, 2008 from the Elections Division Director to all County Elections Officials further elaborated on the administrative record matching procedures between the statewide voter registration database system and DDS. Pursuant to these procedures, the DDS database is routinely queried to identify all new registration applicants or existing registrants who make significant changes to their registration (such as a change of name) who allegedly have previously informed DDS that they were not United States citizens. The individuals identified by these matching procedures are listed in county-level reports provided by Defendant.

38. The Memorandum issued on September 24, 2008 from the Elections Division Director also provides detailed instructions governing the procedures to be used during in-person absentee voting for individuals who are flagged as “non-citizen” in the database. It states, “[I]f DDS records show that the person is not a United State citizen, the voter maintenance screen (2) and absentee ballot maintenance screen (16) show a flashing red warning indication of the individual’s non-citizen status.” The Memorandum also explains that poll officers should not
“allow an individual to cast a regular ballot . . . without confirming through the registrar that such individual is a United States citizen.”

**County Responses to Secretary of State Guidance**

39. Several counties in the State have begun using the State-generated report as the basis for a mailing to demand that the recipients provide proof of their citizenship.

40. Other county election officials, including election officials in Cherokee County, have set hearings for registrants or electors who are “flagged” as “non-citizens” in the database.

**The National Voter Registration Act of 1993**

41. Congress has established a comprehensive registration system for federal elections through, among other statutes, the National Voter Registration Act of 1993, 42 U.S.C. § 1973gg, *et seq* (“NVRA”).

42. Section 8(c) of the National Voter Registration Act of 1993, 42 U.S.C. § 1973gg-6 (“NVRA”) prohibits states from executing, later than 90 days prior to the date of a primary or general election for Federal office, any program the purpose of which is to systematically remove the names of ineligible voters from the official lists of eligible voters, except at the request of the registrant, or by reason of disfranchising criminal conviction, mental incapacity, or death of the
registrant. 42 U.S.C. § 1973gg-6(c)(2)(A). The only exceptions to the 90 day cutoff are removals done: (1) at the request of the registrant; (2) as provided by State law, by reason of criminal conviction or mental capacity; and (3) at the death of the registrant. 42 U.S.C. §§ 1973gg-6(c)(2)(B), 1973gg-6(a)(3)(A-B), 1973gg-6(a)(4)(A).

43. The State of Georgia is subject to the NVRA.

The Citizenship Check and Removal of Registered Voters Within 90 Days of A Federal Election Violates the National Voter Registration Act

44. Defendant Secretary of State is systemically checking the citizenship of at least some registered voters and directing counties to take action against those who are flagged within 90 days of the November 4, 2008 federal election.

The Voting Rights Act and Section 5 Pre-clearance

45. Section 5 of the Voting Rights Act of 1965, 42 U.S.C. §1973c, is a temporary provision that freezes changes in election practices or procedures in states with a documented history of discriminatory voting practices until the new procedures have been determined, either by the United States District Court for the District of Columbia or the United States Attorney General, not to have the purpose or effect of denying or abridging the right to vote on account of race, color
or membership in a language minority group. This process is referred to as “pre-clearance.”

46. Georgia is currently one of the states covered by Section 5 and required to obtain pre-clearance prior to implementing any changes to election practices or procedures.

47. The actions the State of Georgia has taken relating to its voter registration database, including verifying voter information against databases maintained by both the Georgia Department of Driver Services and the federal Social Security Administration (SSA), and generating and distributing reports of the results of those checks to county registrars as the basis for voter challenges, hearings, correspondence or removal, constitute voting changes which require federal pre-clearance.

48. All of these voting changes were implemented without seeking federal pre-clearance.

**Plaintiff Jose Morales’ Voting Rights Have Been Violated**

49. Plaintiff Jose Morales is a resident of Cherokee County, Georgia and has been a resident of Georgia since 2000. Attached hereto as Exhibit A is the declaration of Plaintiff José Julia Morales attesting to the facts set forth in this Complaint.
50. Mr. Morales has been a Legal Permanent Resident of the United States since he was approximately 2 or 3 years old. He became a United States Citizen in November 2007. He obtained his Georgia driver’s license in April 2006.

51. Mr. Morales is currently studying International Affairs at Kennesaw State University in Kennesaw, Georgia. He will be graduating in December 2008 with a B.A. in International Affairs.

52. On or around the beginning of September 2008, Mr. Morales filled out a voter registration form on campus through a student organization.

53. Approximately two weeks after filling out his voter registration form, he received a letter from Cherokee County. The letter indicated that he would not be able to vote unless he provided evidence of his citizenship in court. The letter also indicated that he would be eliminated from the voter list if he did not prove his citizenship.

54. Approximately a week later, Mr. Morales received another letter. The letter indicated he had to provide additional information such as a copy of his driver’s license, passport or other document, that verifies he is a U.S. citizen.

55. Approximately two weeks later, Mr. Morales received a second letter indicating that he needed to provide documentary evidence of his citizenship.
56. Accordingly, Mr. Morales drove to Cherokee County Elections and Registration office located at 400 E. Main Street, in Canton, Georgia, in order to prove his citizenship. The office is located about 30 minutes from Mr. Morales’ home.

57. Mr. Morales indicated to the Clerk that he had been asked to prove his citizenship in order to vote and proceeded to show the clerk his passport.

58. Mr. Morales then asked the Clerk in the Cherokee County Elections and Registration office if his passport was sufficient evidence to enable him to vote.

59. The Clerk indicated that his passport was sufficient to prove his citizenship, and that he would be receiving a voter registration card in the mail. Mr. Morales received his voting card approximately a week later.

60. On or around October 3, 2008, Mr. Morales received a notification in the mail to pick up certified mail addressed to him at his local post office.

61. On or around October 7, 2008, Mr. Morales retrieved the certified mail from the post office. The certified mail was a letter from the Cherokee County Elections and Registration office which indicated that he may not be qualified to vote in Cherokee County because he may not be a U.S. citizen.
62. The letter also stated that if Mr. Morales did not contact the Cherokee County Elections and Registration office before October 15, 2008, or appear at a hearing on the same date, his name would be removed from the list of registered voters.

63. Despite all the steps he has gone through, Mr. Morales' right to vote is still being threatened. Mr. Morales wants to vote, particularly in the upcoming election, and wants to make sure his vote is counted.

CLAIM ONE  
(Section 5 of the Voting Rights Act of 1965)

64. Plaintiff hereby incorporates by reference all foregoing paragraphs as if set forth fully herein.

65. Because Defendant has failed to secure federal pre-clearance of the new voter registration list maintenance procedures based on citizenship which affect voting, these new procedures are legally unenforceable under Section 5 of the Voting Rights Act of 1965, as amended, 42 U.S.C. § 1973c. Any removal of voters from the voter registration list based on these list maintenance procedures is void and violate the rights of Plaintiff as secured by Section 5 of the VRA. Unless enjoined, Defendant will proceed with the voter removals in violation of Section 5.

66. Accordingly, Plaintiff is entitled to a declaration that Defendants' implementation of the new voter registration list maintenance procedures based on
citizenship violates his rights under Section 5 of the Voting Rights Act and to an order temporarily and permanently enjoining use of citizenship information collected via the unprecleared procedures.

CLAIM TWO
(Violation of Section 8(c) of the National Voter Registration Act)

67. Plaintiff hereby incorporates by reference all foregoing paragraphs as if set forth fully herein.

68. Defendant’s application of citizenship check procedures to registered voters and removal of such registered voters within 90 days of a federal election violates Section 8(c) of the NVRA, 42 U.S.C. § 1973gg-6, which prohibits states from executing, later than 90 days prior to the date of a primary or general election for Federal office, any program the purpose of which is to systematically remove the names of ineligible voters from the official lists of eligible voters, except at the request of the registrant, or by reason of disfranchising criminal conviction, mental incapacity, or death of the registrant. 42 U.S.C. § 1973gg-6(c)(2)(A).

69. Accordingly, Plaintiff is entitled to a declaration that Defendant’s application of citizenship check procedures to registered voters and removal of such registered voters based on the citizenship check procedures violates his rights under the NVRA and to an order temporarily and permanently enjoining application of the citizenship check procedures.
REQUEST FOR DECLARATORY RELIEF

70. Pursuant to 42 U.S.C. § 1973c and 28 U.S.C. § 2201, Plaintiff seeks a declaration that Defendant’s implementation of the database matching for registered voters and voter registrants violates the right of Plaintiff as secured by the Voting Rights Act and the National Voter Registration Act.

BASIS FOR EQUITABLE RELIEF

71. Plaintiff has no plain, adequate or complete remedy at law to redress the wrongs alleged herein and this suit for declaratory judgment and injunctive relief is his only means of securing adequate redress from Defendant’s unlawful practices. Plaintiff will continue to suffer irreparable injury from Defendant’s acts, polices and practices set forth herein unless Defendants are enjoined by this Court.

PRAYER

WHEREFORE, Plaintiff respectfully prays that this Court enter Judgment granting Plaintiff:

B. Preliminary and permanent injunctive relief enjoining Defendant, her successors in office, agents, employees, attorneys and those persons acting in concert with her or at her direction from using citizenship information collected through implementation of the database matching system for registered voters and voter registrants; ordering Defendant to employ her full authority to direct all County Boards of Elections to cease using the citizenship check feature of the voter registration database as the basis for voter challenges, hearings, correspondence or removal unless and until the new procedures have received Section 5 preclearance and to rescind pending notices of hearings and/or removal of registered voters and registrants requiring proof of citizenship;

C. Engage in affirmative, corrective measures, including but not limited to sending letters rescinding its previous correspondence to county registrars relating to the citizenship checking feature and to report immediately to the Court any county that refuses to comply;

D. An order of this Court retaining jurisdiction over this matter until the Defendant has complied with all the orders and mandates of the Court;

E. The costs of this suit, including reasonable attorneys’ fees;

and

F. Such other and further relief as the Court may deem just and proper.
Respectfully submitted this 9th day of October, 2008.

Elise Sandra Shore  
Georgia State Bar No. 557131  
Mexican American Legal Defense and Educational Fund  
34 Peachtree St. NW Suite #2500  
Atlanta, GA 30303  
Phone: 678-559-1071  
eshore@MALDEF.org

Laughlin McDonald  
Georgia Bar No. 489550  
Neil Bradley  
Georgia Bar No. 075125  
Meredith Bell-Platts  
Georgia Bar No 048948  
ACLU VOTING RIGHTS PROJECT  
230 Peachtree Street, NW  
Suite 1440  
Atlanta, GA 30303  
(404) 523-2721 (phone)  
(404) 653-0331 (fax)  
lmcdonald@aclu.org  
mbell@aclu.org  
nbradley@aclu.org

Brian Spears  
Georgia Bar No. 670112  
1126 Ponce de Leon Ave., NE  
Atlanta, Georgia 30306  
(404) 872-7086 (phone)  
(404) 892-1186 (fax)  
bspears@mindspring.com
Jon Greenbaum  
Robert A. Kengle  
LAWYERS’ COMMITTEE FOR CIVIL RIGHTS UNDER LAW  
1401 New York Avenue, NW  
Suite 400  
Washington, DC 20005  
(202) 662-8600 (phone)  
(202) 783-0857 (fax)  
jgreenbaum@lawyerscommittee.org  
bkengle@lawyerscommittee.org  
PRO HAC VICE APPLICATIONS PENDING

ATTORNEYS FOR PLAINTIFF
NOTICE OF SUBMISSION PURSUANT TO SECTION 5
OF THE VOTING RIGHTS ACT OF 1965

Notice is hereby given that the Attorney General of the State of Georgia has submitted the entire process and procedure for verifying certain data, including U.S. citizenship, and the use of this information to determine the identity and eligibility of voters to through the use of a database verification comparison between the statewide voter registration database and the records of the Georgia Department of Driver’s Services in compliance with the State of Georgia’s obligations under the Voting Rights Act of 1965. The submission has been made to the Attorney General of the United States for preclearance pursuant to Section 5 of the Voting Rights Act of 1965. A complete duplicate copy of the submission is available for public inspection in the Elections Division of the Office the Secretary of State, Suite 1104, West Tower, 2 Martin Luther King, Jr. Drive, S.E. Atlanta, Georgia. All citizens desiring to comment on this submission may so by submitting those comments to:

Chief, Voting Section
Civil Rights Division
Room 7254 – NWB
Department of Justice
950 Pennsylvania Ave., NW
Washington, DC 20530

Deliveries by overnight express services such as Airborne, DHL, Federal Express, or UPS should be addressed to:

Chief, Voting Section
Civil Rights Division
Room 7254 – NWB
Department of Justice
1800 G St., N.W.
Washington, DC 20006

GEORGIA VRA SUBMISSION 2008-15
EXHIBIT D