

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Civil Action Number
v.)	
)	2:06-CV-00392-WKW-SRW
STATE OF ALABAMA, and)	
NANCY L. WORLEY,)	
Alabama Secretary of State,)	
in her official capacity,)	
)	
Defendants.)	

SUBMISSION OF SECRETARY WORLEY’S ACCOUNTING

Comes now Defendant Nancy L. Worley, in her official capacity as Alabama Secretary of State, by and through Troy King, Attorney General for the State of Alabama, and, in compliance with this Honorable Court’s Memorandum Opinion and Order dated August 8, 2006 (Doc. 64 at 12, n.21), hereby submits her accounting of expenses related to the development and implementation of the HAVA-compliant centralized voter registration system.

The Secretary’s accounting is supported by her affidavit, a spreadsheet of the expenses (Exhibit A to the affidavit) and the underlying expense vouchers (Exhibit B to the affidavit).¹

¹ Consistent with Court procedures and practices, the expense vouchers have been redacted to remove social security numbers and other irrelevant, inappropriate, or sensitive information.

The Secretary has averred that a total of \$278,093.21 has been spent by the Secretary of State's Office on the development and implementation of the HAVA-compliant voter registration system (Affidavit of Nancy L. Worley at 1-2). The Secretary submits that this is the appropriate sum to be deducted from the approximately 12.4 million dollars (\$12,420,932.38) identified by the affidavit of Jeanie G. Price in the Defendants' Accounting filed on July 31, 2006 (Doc. 52) as the monies allocated for development and implementation of the voter registration system to be assigned to the Special Master.²

Undersigned counsel will make unredacted documents available for *in camera* inspection upon entry of an appropriate court order in the event that this Honorable Court needs to see the same.

² As noted in an earlier submission, the State's Central Accounting System does not track the voter registration system funds separately (*See* Affidavit of Jeannie Price at 2-3 found in Doc. 52 Exhibit A). Accordingly, the \$12.4 million was and is necessarily an approximation. (*See id.*) The interest calculation assumed that none of the original \$12 million had been spent (*see id.*), though some had been, as reflected in the Secretary's affidavit and attached documents. Additionally, the interest has not been recalculated to account for the additional month that has passed since Ms. Price's affidavit was filed. Similarly, there is the possibility that the Special Master has already transferred some or all of the funds to the new account.

There is, however, no need to undertake the time-consuming task of ascertaining an exact number. Based on the requests for proposals originally submitted, more than enough money is available to the Special Master for this project. Any left over monies are to be returned to the Secretary of State's HAVA fund once the new voter registration system is in place.

Respectfully submitted,

TROY KING
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BY:

s/Winfield J. Sinclair

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s/ Misty S. Fairbanks

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CERTIFICATE OF SERVICE

This is to certify that on the 1st day of September, 2006, a copy of the foregoing has been electronically filed with the Clerk of the Court using the CM/ECF system, which will electronically send a copy of the same to the following:

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