

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION  
CASE NO. 06-21265-CIV-SEITZ-MCALILEY

LEAGUE OF WOMEN VOTERS OF FLORIDA;  
PEOPLE ACTING FOR COMMUNITY TOGETHER  
(PACT); *et al.*,

Plaintiffs,

v.

SUE M. COBB, individually and in her official capacity as  
Secretary of State for the State of Florida; and DAWN  
ROBERTS, individually and in her official capacity as  
Director of the Division of Elections within the Department  
of State for the State of Florida,

Defendants.

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**NOTICE OF FILING SIGNED JOINT SUBMISSION OF STIPULATED FACTS**

Defendants, Sue M. Cobb, Secretary of State of the State of Florida, and Dawn Roberts,  
Director of the Division of Elections, give notice of their filing the signed Joint Submission of  
Stipulated Facts.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the foregoing has been served by electronic transmission and  
U.S. Mail this 28th day of July, 2006, to the following:

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 06-21265-CIV-SEITZ/MCALILEY

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LEAGUE OF WOMEN VOTERS OF FLORIDA, PEOPLE :  
ACTING FOR COMMUNITY TOGETHER (PACT), FLORIDA :  
AFL-CIO, AMERICAN FEDERATION OF STATE, COUNTY :  
AND MUNICIPAL EMPLOYEES, COUNCIL 79 (AFSCME), :  
SEIU FLORIDA HEALTHCARE UNION, as organizations and :  
as representatives of their members; MARILYNN WILLS; and :  
JOHN and JANE DOES 1-100, :  
:

Plaintiffs, :

v. :

SUE M. COBB, individually and in her official capacity as :  
Secretary of State for the State of Florida, and DAWN :  
ROBERTS, individually and in her official capacity as Director of :  
the Division of Elections within the Department of State for the :  
State of Florida, :  
:

Defendants. :  
----- X

**JOINT  
SUBMISSION OF  
STIPULATED  
FACTS**

The Parties, after having conferred, now submit this Joint Submission of Stipulated Facts. Unable to agree on all facts, the Parties will offer testimony and documents at the July 18 hearing.

1. As of January 2006, the total number of Florida citizens registered to vote was approximately 10.4 million. In total, the number of registered voters in Florida has increased by more than 2.3 million over the past ten years.
2. Both non-partisan third-party voter registration organizations and political parties in Florida submit to election officials voter registration applications that they collect from prospective registrants.

3. Some political parties and non-partisan third-party voter registration organizations have, in the past, collected completed voter registration applications before a book-closing deadline and submitted a portion of those applications after the book-closing deadline.

4. Some supervisors of elections report that in the past they received late or incomplete voter registration applications from private voter registration organizations, including political parties, but not including the organizational Plaintiffs in this action.

5. Florida currently recognizes 25 political parties, which are: Florida Democratic Party, Republican Party of Florida, America First Party of Florida, American Libertarian Party, American Poor People Party, American Reform Party of Florida, British Reformed Sectarian Party, The Christian Party, Constitution Party of Florida, Faith & Patience Inc. N.P.G.G. , Family Values Party, Florida Socialist Workers, Green Party of Florida, Inc., Independence Party of Florida, Independent Democrats of Florida, Independent Party of Florida, Libertarian Party of Florida, The Moderate Party, Possibility Party, Progressive Libertarian Party, Prohibition Party, Reform Party, Socialist Party of Florida, Surfers Party of America, Veterans Party of America.

6. Since the challenged law became effective, the organizational Plaintiffs have stopped assisting citizens, including their own members, in registering to vote. The organizational Plaintiffs fear the risk of fines to themselves, their officers and directors, and their member volunteers under the challenged law.

7. Plaintiff Marilyn Wills, a member of the League of Women Voters, has stopped assisting others to register to vote after the challenged law became effective. Ms. Wills believes that the challenged law poses a risk that she will be personally and jointly and severally liable for

finer as a result of the collection and submission of voter registration applications by herself or other League members.

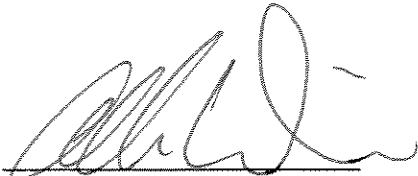
8. Wills and the organizational Plaintiffs wish to continue assisting eligible citizens to register to vote, including by collecting and submitting applications on behalf of those citizens.

9. Prior to the Florida Legislature's action in enacting the challenged legislation, there were complaints concerning the late submission of or the failure to submit voter registration applications by third-party voter registration organizations. Such accounts did not include complaints about Wills or the organizational plaintiffs.

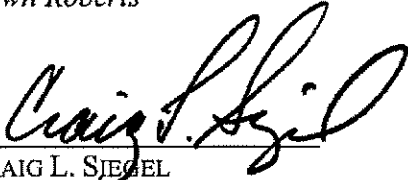
10. The State of Florida has an interest in protecting the rights of its citizens to register and vote.

11. The State of Florida has an interest in reducing fraud and promoting administrative efficiency with respect to voter registration.

12. Prior to 1994, none of the Plaintiffs regularly collected and submitted voter registration applications from their members or other individuals unless they had been deputized as assistant registrars by a supervisor of elections.



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