

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

OHIO REPUBLICAN PARTY, et al. :

Plaintiffs,

v.

**JENNIFER BRUNNER,
Secretary of State of Ohio,**

Defendant

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Case No. 2:08CV913

JUDGE SMITH

MAGISTRATE JUDGE KING

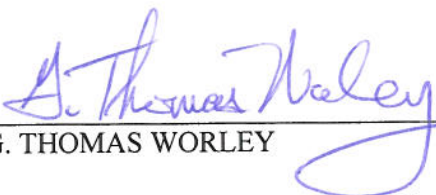
AFFIDAVIT OF G. THOMAS WORLEY

I, G. Thomas Worley, having been duly cautioned and sworn, state the following on personal information and belief.

1. I am over eighteen years of age and am competent to testify to the matters contained in this affidavit.
2. Currently, I serve as the Chief of Staff in the Office of the Ohio Secretary of State. In that capacity I oversee the following divisions: legal services, information technology, finance, human resources, and business services.
3. The Information Technology and Legal Services Divisions of the Secretary of State's office have been working virtually non-stop to determine in detail the capabilities and working of the Statewide Voter Registration Database ("SWVRD") in order to comply with the Temporary Restraining Order issued by the District Court on October 9, 2008.
4. Information Technology employees at the Secretary of State's Office continued to work on the SWVRD after the Order granted on October 9, 2008, despite the fact that the Sixth Circuit stayed the temporary restraining order for a time period continuing from October 10, 2008 to October 14, 2008.
5. During the course of attempting to comply with the Court's Order, the Secretary of State's Office discovered that there may be issues related to the manner in which searches are processed by the Bureau of Motor Vehicles ("BMV") or the Social Security Administration, and the manner in which the results are displayed for review by the board of elections. Display issues appear to have resulted from modifications made by the Secretary of State's Office in June 2006. Search issues are related to applications administered by the BMV. Upon discovering this information, the Secretary of State's Office has been working diligently to resolve the issues with the BMV.

6. The BMV has been made aware of the potential problems with the current programming of the SWVRD and they have informed the Secretary of State's Office that they are looking into the issues as well.
7. A meeting has been scheduled for 9:00 a.m. on October 16, 2008, where members of BMV, Secretary of State's Office, and Attorney General's Office plan to work through issues on how the SWVRD is implemented.
8. Scheduled to attend this meeting are: members of the Information Technology Section of the Ohio Department of Public Safety; members of the Information Technology Section of the Ohio Secretary of State; the Director and Assistant Director of the Ohio Department of Public Safety; members of the administration at the Secretary of State's Office; members of the legal staff at the Secretary of State's Office; members of legal staff for the Department of Public Safety; and several Assistant Attorneys General.
9. I am aware that the Secretary has also had conversations with the leadership of the Ohio Association of Elections Officials on Friday, October 10, 2008 concerning the implementation of the Court's temporary restraining order. The OAEA is a bi-partisan group of Ohio's elections officials. The purpose of this conversation was to begin to seek input from these officials on the most effective manner in which to provide information to the boards of elections in order to implement this Court's temporary restraining order.

FURTHER, AFFIANT SAYETH NAUGHT.


G. THOMAS WORLEY

Sworn to before me and subscribed by G. Thomas Worley in my presence this 15 day of October, 2008.


Notary Public

RICHARD N. COGLIANESE
Attorney At Law
Notary Public, State of Ohio
My Commission Has No Expiration Date
Section 147.03 R.C.