

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WASHINGTON ASSOCIATION OF CHURCHES,
as an organization and representative of its
members; WASHINGTON ASSOCIATION OF
COMMUNITY ORGANIZATIONS FOR
REFORM NOW (ACORN), as an organization and
representative of its members; ORGANIZATION
OF CHINESE-AMERICANS – GREATER
SEATTLE CHAPTER, as an organization and
representative of its members; CHINESE
INFORMATION & SERVICE CENTER, as an
organization and representative of its clients;
FILIPINO AMERICAN POLITICAL ACTION
GROUP OF WASHINGTON, as an organization
and representative of its members; KOREAN
AMERICAN VOTERS ALLIANCE, as an
organization and representative of its members;
SERVICE EMPLOYEES INTERNATIONAL
UNION (SEIU) – LOCAL 775, as an organization
and representative of its members; and
WASHINGTON CITIZEN ACTION, as an
organization and representative of its members,

Plaintiffs,

vs.

SAM REED, in his official capacity as Secretary of
State for the State of Washington,

Defendant.

NO. CV06-0726 RSM

DECLARATION OF
MARINA S. PETRIENKO

*Declaration of Marina S. Petrienko
(CV 06-0726 RSM)
-Page 1 of 3*

HILLIS CLARK MARTIN &
PETERSON, P.S.

500 Galland Building, 1221 Second Ave
Seattle WA 98101-2925
206.623.1745; fax 206.623.7789

1 I, Marina S. Petrienko, hereby declare as follows:

2 1. I am over 18 years old, a United States citizen, and a resident of the state of
3 Washington. I live at 18805 SE 13th Street, Vancouver, Washington 98683. I became a
4 United States citizen last year.

5 2. On December 15, 2005, shortly after I became a citizen, I attempted to
6 register to vote for the first time by filling out a voter registration form, which I completed
7 and submitted to a person conducting a voter registration drive. I wrote down my name,
8 address, date of birth, telephone number, and the last four digits of my Social Security
9 number on the form. The information I wrote down is accurate. A copy of the registration
10 form I filled out is attached as Exhibit A.

11 3. In listing my date of birth, April 16, 1975, I used the "date/month/year"
12 format, or "16/04/75," which is commonly used in the country where I'm originally from. I
13 note that it appears someone has re-written my date of birth on my registration form using
14 the "month/date/year" format, or "4/16/75." However, it appears from records of my
15 registration that I have been shown (attached as Exhibit B) that someone inputted the wrong
16 year, 1976 instead of 1975.

17 4. I understand from my husband that some time after I submitted the
18 registration form, we received a written notice saying that there was some problem relating
19 to my Social Security number. My husband called the number listed on the notice and
20 confirmed that the last four digits of my Social Security number were as I had written them
21 on the form.

22 5. From the documents I have been shown, it now appears that I have not been
23 registered as a result of the fact that someone other than me wrote down the wrong year for
24 my birth date. I would not have learned this if I had not been contacted by the lawyers for
25 the plaintiffs in this case.

26
27
28
Declaration of Marina S. Petrienko
(CV 06-0726 RSM)
-Page 2 of 3

HILLIS CLARK MARTIN &
PETERSON, P.S.

500 Galland Building, 1221 Second Ave
Seattle WA 98101-2925
206.623.1745; fax 206.623.7789

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct and of my own knowledge.

DATED this 25 day of July 2006 at Vancouver, Clark County, Washington.


Marina S. Petrienko

July 25, 2006.

*Declaration of Marina S. Petrienko
(CV 06-0726 RSM)
-Page 3 of 3*

HILLIS CLARK MARTIN &
PETERSON, P.S.

500 Galland Building, 1221 Second Ave
Seattle WA 98101-2925
206.623.1745; fax 206.623.7789

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of July, 2006, I electronically filed this DECLARATION OF MARINA S. PETRIENKO with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

James K. Pharris
Greg Overstreet
Jeffrey T. Even
Attorney General of Washington
1125 Washington Street SE
Post Office Box 40100
Olympia, WA 98504-0100
jamesp@atg.wa.gov
grego@atg.wa.gov
jeffe@atg.wa.gov

Counsel for Defendant

DATED this 25th day of July, 2006, at New York, New York.

/s/ J. Adam Skaggs
J. Adam Skaggs

*Declaration of Marina S. Petrienko
(CV 06-0726 RSM)
-Page 4 of 4*

HILLIS CLARK MARTIN &
PETERSON, P.S.
500 Galland Building, 1221 Second Ave
Seattle WA 98101-2925
206.623.1745; fax 206.623.7789

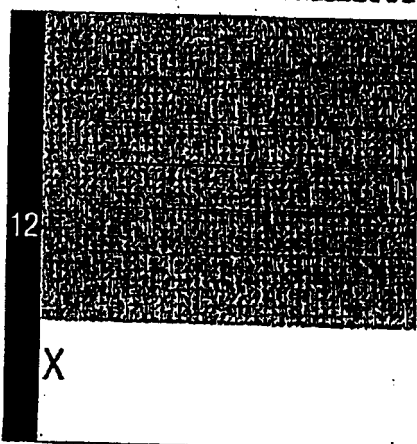
EXHIBIT A

Use Pen - Please Print Clearly

1	Are you a citizen of the United States of America? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No*	2	Will you be 18 years of age on or before election day? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No*	For Official Use Only
<p style="text-align: right;">IN PERSON ORG KING Co JAN 4 2 2006</p>				
<p>*NOTE: If you checked "NO" in response to box 1 or 2 above, do not complete this form</p>				
3	<input type="checkbox"/> Mr. <input checked="" type="checkbox"/> Mrs. <input type="checkbox"/> Miss <input type="checkbox"/> Ms.	Last Name <i>Petrienko</i>	First Name <i>MARINA</i>	Middle Initial <i>S</i> <input type="checkbox"/> h <input type="checkbox"/> r <input type="checkbox"/> ni <input checked="" type="checkbox"/> Mal <input type="checkbox"/> Fem
4	Address Where You Live <i>18805 SE 13th St. Vancouver WA</i>		City or Town <i>Vancouver</i>	ZIP Code <i>98683</i>
5	Address Where You Get Your Mail (if Different than #4) <i>N/A</i>		City or Town	State <i>WA</i> ZIP Code
6	Date of Birth (Month/Day/Year) <i>10-04-75</i>	7	Daytime Phone Numl <i>(360) 891-</i>	Redacted
Federal Law requires you to provide your Driver's License, or ID Card #.		WA Driver's License or ID # Redacted		
8		Redacted		
<p>If submitting this form by mail and you are registering for the first time in this county, and did not enter the above information, you must provide:</p> <ul style="list-style-type: none"> • A valid photo copy of your current photo ID • Copy of a current utility bill • Bank statement • Government check • Paycheck • Or other government document that shows your name and address <p>This will eliminate ID requirements when voting for the first time.</p>				
		SIGN HERE X Redacted		

FOLD HERE FIRST

10	Last Name <i>Petrienko</i>	First Name <i>Marina</i>	Initial <i>S</i>
ONGOING ABSENTEE REQUEST I would like to receive absentee ballots for all future elections: YES <input checked="" type="checkbox"/> CHECK ONE NO <input type="checkbox"/>		ONGOING ABSENTEE VOTER STATUS This status can be cancelled for any of the following reasons: 11 • Cancellation of your voter registration • Your written request for cancellation • Death or disqualification of the voter • Return of an ongoing absentee ballot as undeliverable	
Note: Because of the new federal Help America Vote Act, if you are a first-time voter who registered by mail, you may be required to show identification at the time of voting.			



Secretary of State Mail-In VR (8/04)

EXHIBIT B

AN
A
I
C
P
F

By Name

Enter full or partial name

Last: PETRENKO

First: MARINA Initial:

Surname Search All/Prior Names

By Address

Locate

XXXXXXXXXXXXXXXXXXXX

By Precinct

By ID

#	S	I	P	LAST NAME	FIRST NAME	INT	DOB	POB	HOUSE	FRAC	PRE	STREET	TYPE	DIR	APT	CITY	REG DATE	PARTY	AFFIDAV
1	C			PETRENKO	MARINA							SE 13TH	ST			VANCOUVER	01/12/2005	NP	

Redacted

↓
↑

Voter Details	Properties
Comments NO LETTER SENT 32-06 LL	Connected Records
	Flags/Misc
	<input type="checkbox"/> Last Transaction
	Comments
	Attachments
	Volvo History
	Rejection
	Permits
	Disabilities
	Pend Codes
	Merge with
<input type="text"/>	<input type="text"/>
<input type="button" value="Ok"/>	<input type="button" value="Cancel"/>
<input type="button" value="Delete"/>	<input type="button" value="Print"/>
	<input type="button" value="Ok"/> <input type="button" value="Cancel"/>



#	vote_trf	field	before	after	trans_date	login	trans_c
1	967913	LAST TRANS DATE	Mar 2 2006 4:01PM	Mar 2 2006 10:48AM	5/2/2006 10:48:46 AM	LANGROUP\lveid	UPD
2	967913	REASON	VRS - CANNOT VERIFY	45 DAY FATAL	5/2/2006 10:48:46 AM	LANGROUP\lveid	UPD
3	967913	STATUS	F	C	5/2/2006 10:48:46 AM	LANGROUP\lveid	UPD
4	969587	REASON	8-OFFICE CORRECTION FATAL	VRS - CANNOT VERIFY	4/21/2006 2:02:20 AM	DM	UPD
5	934947	COMMENT ID	0	58202	3/2/2006 4:01:29 PM	LANGROUP\lveid	UPD
6	934947	LAST TRANS DATE	Feb 15 2006 9:05AM	Mar 2 2006 4:01PM	3/2/2006 4:01:29 PM	LANGROUP\lveid	UPD
7	934947	MISSING INFORMATION		YES	3/2/2006 4:01:29 PM	LANGROUP\lveid	UPD
8	934947	NEW PEND CODE 2369		STATE ID	3/2/2006 4:01:29 PM	LANGROUP\lveid	ADD
9	934947	NEW PEND CODE 2372		VERIFICATION NEEDED	3/2/2006 4:01:29 PM	LANGROUP\lveid	ADD
10	934947	REASON		8-OFFICE CORRECTION FATAL	3/2/2006 4:01:29 PM	LANGROUP\lveid	UPD
11	934947	REMOVE PEND CODE 2369	STATE ID		3/2/2006 10:33:06 PM	DM	REM
12	926094	VNC GENERATED	GENERATED	YES	2/15/2006 2:37:33 PM	LANGROUP\psnyb	MAIL
13	926094	VNC MAILED	MAIL DATE	02/15/2006	2/15/2006 2:37:33 PM	LANGROUP\psnyb	MAIL
14	921464	REMOVE PEND CODE 2369	STATE ID		2/15/2006 9:07:48 AM	DM	REM
15	921460	BY MAIL		YES	2/15/2006 9:05:34 AM	LANGROUP\psnyb	INS
16	921460	NEW PEND CODE 2369		STATE ID	2/15/2006 9:05:34 AM	LANGROUP\psnyb	ADD
17	921460	NEW RECEIPT			2/15/2006 9:05:34 AM	LANGROUP\psnyb	INS
18	921460	VNC		YES	2/15/2006 9:05:34 AM	LANGROUP\psnyb	INS

Close