Exhibit B
October 8, 2013

Delivered through Counsel, Harry Joseph (Skip) Philips, Jr.
Charlie Dirks, Director
Or designated Official Custodian of Records
State of Louisiana Department of Children and Family Services
P.O. Box 1887
Baton Rouge, LA 70821

Re: Public Records Request for Voter Registration Documents

Dear Mr. Dirks,

This letter is addressed to you or your designee, as the Official Custodian of Records for the Department of Children and Family Service (“DCFS”). If you are not the Official Custodian of Records, however, please forward this request to the person who serves in that capacity, or alternatively, provide me with the name and mailing address of that person.

As you know, a permanent injunction was issued on January 23, 2013 by the United States District Court for the Eastern District of Louisiana in Scott, et al. v. Schedler, et al., Civil Action No. 11-926, requiring that DCFS comply with the National Voter Registration Act of 1993 (“NVRA”).

We write to request copies of documents regarding voter registration activities conducted by DCFS pursuant to Section 7 of the NVRA. In particular, we request copies of all the public records listed below pursuant to the Louisiana Public Records Act, La. Rev. Stat. Ann. § 44:1 et seq.:

1. Copies of any and all documents, issued since October 15, 2012, relating to the NVRA, DCFS’s compliance with the NVRA, and/or voter registration including specifically documents related to all DCFS programs/offices required to comply with Section 7 of the NVRA.

2. Copies of any and all policies from the Administrative Procedures Manual that relate to the NVRA, NVRA compliance and/or voter registration issued since October 15, 2012, including but not limited, to the current version of the C-210 policy.

3. Copies of any and all Executive Bulletins related to the NVRA, NVRA compliance, and/or voter registration issued since October 15, 2012.
4. Copies of any and all other DCFS policy documents, if any, that address when, how, and under what circumstances voter registration applications are provided during applications for benefits, renewals/recertifications, and changes of address transactions issued since October 15, 2012.

5. Copies of any and all DCFS policies issued since October 15, 2012, if any, addressing the assistance that employees should or must provide to benefits clients or applicants related to voter registration.

6. Screen shots from any and all online benefits applications used by DCFS currently and/or in use since October 15, 2012 that show the offer of voter registration or relate to voter registration, including but not limited to CAFÉ.

7. Copies of any and all DCFS policy documents issued since October 15, 2012, if any, addressing the policies and procedures for distributing voter registration applications during benefits transactions (applications, renewals, or change of address) that are initiated online, including but not limited to those utilizing CAFÉ.


9. Copies of any and all training materials issued since Oct. 15, 2012 used by DCFS or any of its agency offices to train employees on performing the duties required for voter registration conducted under the NVRA. We further request documents indicating the dates, agenda, and attendance of any training provided to DCFS staff or DCFS contractors that relate to the voter registration program from January 2013 to the present.

10. Mr. Luther Scott, Jr.’s case file for all transactions occurring since March 15, 2013. The last four digits of Mr. Scott’s identification number are 3828.1 Attached please find a letter from Mr. Scott, granting permission for his casefile to be released to us.

11. Electronic records identifying the number of (a) applications for service or assistance; (b) applications for recertification or renewal; and (c) request for change of address received by DCFS or an agency offices from January 2013 to the present. If available, we would like to receive the information broken down by month and by office. To the extent electronic data is unavailable, please provide hard copies.

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1 The full number is not provided to protect Mr. Scott’s privacy. If the full number is needed, I am willing to provide it in a separate and private correspondence.
12. Electronic records identifying the number of completed voter registration applications forwarded or otherwise sent/transmitted by DCFS offices to the appropriate office for registrars of voters from January 2013 to the present. If available, we would like to receive the information broken down by month and by office. To the extent electronic data is unavailable, please provide hard copies.

Please provide the forgoing information electronically or on a flash drive, CD or disk. Please advise me if the fee for this request exceeds $100.

It is our understanding that you will receive this letter on or before October 11, 2013. To the extent that you have any objection(s) to the production of the requested information, please provide within three days of the receipt of this letter, exclusive of Saturdays, Sundays and legal public holidays, written reasons setting forth the grounds for your position (by October 17, 2013). See R.S. 44:32(D). If you fail to object within that time period, you are required to provide the requested documents within five days of the receipt of this written request, exclusive of Saturdays, Sundays and legal public holidays (by October 21, 2013).

Thank you in advance for your assistance. If you have any questions, please feel free to contact me via phone or email.

Sincerely,

-S-

Sarah Brannon
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Enclosure

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