

IN THE SUPERIOR COURT OF FULTON COUNTY

STATE OF GEORGIA

MS. ROSALIND LAKE and)
MR. MATTHEW L. HESS,)
qualified and registered voters)
under Georgia law,)
)
Plaintiffs,)
v.)
HON. SONNY PERDUE, individually)
and in his official capacity as Governor;)
et al.,)
)
Defendants.)

CIVIL ACTION
FILE NO. 2006-CV-119207

STATE DEFENDANTS' APPENDIX OF EXHIBITS

COME NOW Defendants Sonny Perdue and the State Election Board ("State Defendants"), and hereby submit this Appendix of Exhibits in support of *State Defendants' Brief in Opposition to Plaintiff's Memorandum in Support of Their Motion for a Temporary Restraining Order*, which is filed with the Court contemporaneously herewith.

<u>Tab</u>	<u>Description</u>
A	Affidavit of Gloria Champion
B	Affidavit of Claud L. McIver, III
C	Affidavit of Thomas Blake Ussery
D	Deposition of Rosalind Lake, taken on June 23, 2006, in <i>Berry v. Perdue</i> , Superior Court of DeKalb County, Civil Action No. 06CV4751-4
E	U.S. Department of Justice Preclearance Letter (for the 2006 Photo ID Act), dated April 21, 2006
F	Rules Adopted by State Election Board, Ga. Comp. R. & Regs. r. 183-1-20-.01 (2006)
G	Florida International University, "Facts at a Glance," (copy of webpage) http://www.fiu.edu/docs/downloads/FIUaboutus.pdf (visited June 27, 2006)

- H** U.S. Department of Justice Preclearance Letter (for the rules adopted by the State Election Board), dated June 27, 2006
- I** Complaint for Declaratory and Injunctive Relief, filed April 12, 2006, in *Berry v. Perdue*, Superior Court of DeKalb County, Civil Action No. 06CV4751-4
- J** Order Shortening Time to Respond to Defendants' Motion to Dismiss for Lack of Standing, filed June 29, 2006, in *Berry v. Perdue*, Superior Court of DeKalb County, Civil Action No. 06CV4751-4
- K** Plaintiff's Voluntary Dismissal Without Prejudice, filed June 30, 2006, in *Berry v. Perdue*, Superior Court of DeKalb County, Civil Action No. 06CV4751-4
- L** "Voters in no hurry to get IDs," Rome News-Tribune, July 2, 2006
- M** Affidavit of Stefan Passantino
- N** Affidavit of Bradley J. Lewis
- O** Affidavit of Ruby J. Kajumba

This 5th day of July, 2006.

Respectfully submitted,

THURBERT E. BAKER
Attorney General
Georgia Bar No. 033887

DENNIS R. DUNN
Deputy Attorney General
Georgia Bar No. 234098

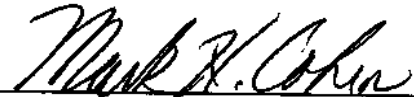
STEFAN E. RITTER
Senior Assistant Attorney General
Georgia Bar No. 606950

40 Capitol Square, S.W.
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MARK H. COHEN
Special Assistant Attorney General
Georgia Bar No. 174567



ANNE W. LEWIS
Special Assistant Attorney General
Georgia Bar No. 737490
(signed with express permission by Mark H. Cohen)

CERTIFICATE OF SERVICE

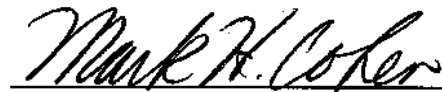
This is to certify that I have this day served a true and correct copy of the STATE DEFENDANTS' APPENDIX OF EXHIBITS upon the following counsel of record via electronic mail and U.S. mail addressed as follows:

Roy E. Barnes, Esq.
roy@barneslawgroup.com
Jennifer Auer Jordan, Esq.
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Marietta, GA 30061

O. V. Brantley, Esq.
Fulton County Attorney
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Atlanta, GA 30303
ov.brantley@co.fulton.ga.us

A. Lee Parks, Jr., Esq.
Parks, Chesin & Walbert, P.C.
26th Floor
75 Fourteenth Street
Atlanta, GA 30309
lparks@pcwlawfirm.com

This 5th day of July, 2006.



MARK H. COHEN
Georgia Bar No. 174567

Exhibit A

IN THE SUPERIOR COURT OF FULTON COUNTY

STATE OF GEORGIA

MS. ROSALIND LAKE and)
MR. MATTHEW L. HESS)
qualified and registered voters)
under Georgia law,)

Plaintiffs,)

v.)

CIVIL ACTION
FILE NO. 2006-CV-119207

HON. SONNY PERDUE, in his)
official capacity as Governor;)

STATE ELECTION BOARD; and,)

MS. GLORIA CHAMPION,)
Superintendent of Elections for Fulton)
County, Georgia; MS. JUANITA)
MARSHALL EBER, Chair of the Fulton)
County Board of Elections; MRS.)
CYNTHIA J. WILLIAMS, MR. HARRY)
W. MCDONALD, MR. FRANK B.)
STRICKLAND, and MR. SAMUEL P.)
WESTMORELAND,)

Defendants.)

AFFIDAVIT OF GLORIA W. CHAMPION

COUNTY OF FULTON

STATE OF GEORGIA

I, GLORIA W. CHAMPION, having appeared before the undersigned officer
duly authorized to administer oaths and having been so sworn, states and deposes as
follows:

1.

My name is Gloria W. Champion. I am over 18 years of age, competent under

federal and state law to make this affidavit and do so upon my own personal knowledge.

This affidavit is made for use in the above-styled case.

2.

I am the Supervisor of the Fulton County Board of Registration and Elections ("the Fulton Board"). I have served in that position for 6 1/2 years. Prior to becoming the Supervisor, I served as the Elections Chief for the Fulton Board. I have been with the Fulton Board for 26 years.

3.

As Supervisor, I supervise all election activities conducted by Fulton County, including registering all eligible citizens to vote; assigning voters to respective precincts in accordance with state and federal laws; maintaining registration records; conducting all primaries and federal, state, county and municipal elections in accordance with Georgia election code; answering questions regarding elected officials and election districts, election statistics, and other registration and election related matters; and operating all polling locations including an absentee poll for federal, state, county, and municipal elections.

4.

Voting for the July 18, 2006 primary has already begun using the 2006 Photo ID law. Already, 168 voters have cast their absentee ballots in person and have been required to show one of the six forms of photo ID. See Exhibit 3 attached. Many more voters are expected to cast their absentee ballots in person during advance voting, which begins July 10, 2006.

5.

In connection with this case, I have reviewed our office's records on Rosalind Lake, who recently transferred her voter registration to Fulton County. The Voter Maintenance and Voter History on Ms. Lake are attached as Exhibit 1 to this Affidavit. Those documents show that Ms. Lake first registered to vote in Georgia in 2003 but has never done so.

6.

I have also reviewed the Voter Maintenance and Voter History on Max L. Hess, which are attached to this Affidavit as Exhibit 2. Mr. Hess first registered to vote in Fulton County in 1992 and appears to vote regularly.

7.

According to the Complaint, Mr. Hess does not have a photo ID for voting. All three of our offices – the downtown office, North and South service centers – are equipped with the machines, supplies and personnel to issue photo ID cards to voters. Each of our offices has a set of equipment (camera, computer, and printer) to produce Voter Identification Cards for registered voters who wish to vote in person and do not already have an acceptable form of photographic identification. The State Election Board provided us with all the necessary equipment, supplies, training and technical support to produce the Voter Identification Cards which our office will issue; we did not pay for any of that. It is our understanding that the necessary equipment, supplies, training and technical support, as well as maintenance of the machinery already provided to us, will continue to be provided by the State as needed.

8.

We elected to order a set of the machinery for the North and South service

centers. We have also ordered an additional unit so that we have an extra unit to take to locations such as nursing homes and locales frequented by the public in order to produce a Voter Identification Card for people who may need one for in-person voting but have some difficulty in getting to one of our three office or to one of the Department of Driver Services offices. My office has sufficient funds to pay for this additional equipment.

9.

We have only received a few calls about the cards. Most calls are from voters who have driver's licenses but because of confusing media reports, think they also need a Voter Identification Card. When we get those calls, our office inquires whether the caller has another form of acceptable photo ID. If the caller does, we advise the caller to use that ID. If the caller does not, we provide information on how to obtain a Voter Identification Card. We also advise the callers about the availability of mail in absentee voting to all voters and instruct the caller on how to request an absentee ballot.

10.

Based on the minimal number of inquiries we have had, the fact that the majority of callers do not need a photo ID and my experience with the Fulton Board, I believe the equipment we have is sufficient to fulfill any requests for the Voter Identification Card. In the event a greater number of registered voters request the Voter Identification Card than I anticipate, then I would employ another temporary worker at the rate of about \$10.00 per hour to assist my office in handling any unexpected demand. My office has sufficient funds to pay for this additional labor.

11.

We trained employees in each office on the use of the machinery which produces

the Voter Identification Card. All offices began issuing the Voter Identification Cards on Friday, June 30, 2006, and as of this morning, we have issued a total of five cards.

12.

This morning, our office held a press conference regarding the availability of the Voter Identification Cards and the ability of all voters to request and cast a mail-in absentee ballot. All the major television channels attended, as did the Atlanta Journal Constitution, the Atlanta Voice and a number of radio stations. We have requested that media outlets run Public Service Announcements and public affairs segments, and we have already received agreement from WALR to do so; V-103 is attempting to provide the same. We have made the request to other radio stations as well.

13.

In addition to the press conference, our office has created posters and a letter explaining the photo ID requirements and absentee voting by mail, which have been or will be distributed to all county departments that are frequented by the public, such as the health department, libraries, art centers, fire stations, human services department. We are also sending those same materials to community organizations including the League of Women Voters and Neighborhood Planning Units for distribution to their membership.

14.

With respect to updating voter registration rolls, there is no such thing as "automatic updating" on a statewide basis. The state has the capability of deleting deceased voters based on reports generated by the Vital Records Department through file management. However, each county is responsible for updating its rolls on the statewide system, the process of which varies by county.

FURTHER AFFIANT SAYETH NOT.

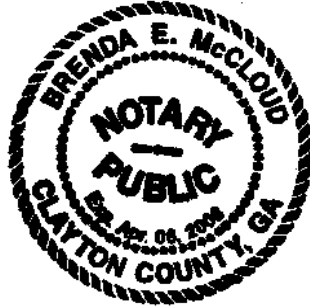
This 5th day of July, 2006.

Gloria M. Champion
GLORIA CHAMPION

Sworn to and subscribed before me
this 5th day of July, 2006.

Brenda E. McCloud
Notary Public

My commission expires: April 6, 2008



SSVR0001-02
CICSA3

VOTER REGISTRATION
VOTER MAINTENANCE

07/03/06 05:56 PM
FULTON

ACTION: I (ACI) REG NBR: 5704289 APPL NBR: STATUS: A ACTIVE
NAME:
L: LAKE F: ROSALIND M: S:
ADDR: 400 RALPH MCGILL BLVD SUF: NE APT: 6E BLDG:
CITY: ATLANTA ZIP: 30312 - 1242 COUNTY: 60 FULTON
SS# : BIRTH DATE: 07 14 1946 GENDER: F RACE: B LAND DIST:
REG DATE: 06 02 2006 STATUS DATE/REASON: LAND LOT :
CONTACT DATE/TYPER: 06 19 2006 DUP2 IDP: N CORRECTION? PRT PRECINCT CARD?
SITE: 00002 PW:
MAIL ADDR: APT: PO/RR:
CITY: ST: ZIP: COUNTRY:
ADDITIONAL ADDR :
CO PREC: 02D 02D MUNI PREC: 02D 02D
DISTRICT COMBO: 41

**** PREVIOUS INFORMATION ****

NAME:
ADDR: 4172 EMERALD LAKE DR REG#: 5704289
CITY: DECATUR ST: GA ZIP: 300352740 COUNTY: DEKALB
CHANGED BY: \$@SSBFH ON: 06/28/2006 ADDED BY: \$@SSNDH ON: 04/22/2003
NEXT SCREEN: (PF1=HELP PF2=REF PF3=RET PF8=FWD PF10=CLIST ENTER=ACTION)
0054-YOUR INQUIRY WAS SUCCESSFUL.

EXHIBIT 1

SSVR0001-02
CICSA3

VOTER REGISTRATION
VOTER MAINTENANCE

07/03/06 05:59 PM
FULTON

ACTION: I (ACI) REG NBR: 2594020 APPL NBR: STATUS: A ACTIVE
NAME:
L: HESS F: MAX M: J S:
ADDR: 756 DIXIE AVE SUF: NE APT: BLDG:
CITY: ATLANTA ZIP: 30307 - 2408 COUNTY: 60 FULTON
SS# : BIRTH DATE: 07 22 1956 GENDER: M RACE: O LAND DIST:
REG DATE: 02 13 1992 STATUS DATE/REASON: LAND LOT :
CONTACT DATE/TYPER: 11 08 2005 VOTE IDP: CORRECTION? PRT PRECINCT CARD?
SITE: PW:
MAIL ADDR: APT: PO/RR:
CITY: ST: ZIP: COUNTRY:
ADDITIONAL ADDR :
CO PREC: 02G 02G MUNI PREC: 02G 02G
DISTRICT COMBO: 41

**** PREVIOUS INFORMATION ****

NAME:
ADDR: REG#: M1036294
CITY: ST: GA ZIP: COUNTY:
CHANGED BY: *VRHIST ON: 11/16/2005 ADDED BY: CONVERSN ON: 07/09/1995
NEXT SCREEN: (PF1=HELP PF2=REF PF3=RET PF8=FWD PF10=CLIST ENTER=ACTION)
0054-YOUR INQUIRY WAS SUCCESSFUL.

EXHIBIT 2



INTER-OFFICE MEMORANDUM

TO: Ms. Gloria W. Champion, Director, Registration and Elections
FROM: Charles E. Liverpool, ACIII, Registration Division *clh*
RE: Primary & Special Elections, July 2006 – Absentee Voting
DATE: July 3, 2006

Listed below are Absentee Ballots processed as of 5:00 pm, Friday, June 30, 2006 for the Primary and Special Elections to be held on July 18, 2006.

Ballots Mailed Out							
	Other Reasons	Military Stateside	Military Overseas	Temporarily Overseas	Permanent Overseas	Total Issued	Returned Ballots
Republican	1,416	74	50	105	6	1651	359
Democratic	1,384	108	76	203	37	1807	374
Alpharetta Spl.	3	0	1	8	2	14	0
Hapeville Spl.	5	0	1	0	0	6	0
Johns Creek Spl.	95	4	5	18	3	125	35
Milton Spl.	31	2	0	4	0	37	8
Sandy Springs Spl.	12	5	9	37	5	68	2
Total	2,946	193	142	375	53	3,708	778

Voted Absentee In Person (includes advance voting)				
	North	South	Main	Total Returned
Republican	67	2	4	73
Democratic	22	36	33	91
Alpharetta Spl.	0	0	0	0
Hapeville Spl.	0	0	0	0
Johns Creek Spl.	4	0	0	4
Milton Spl.	0	0	0	0
Sandy Springs Spl.	0	0	0	0
Total	93	38	37	168

Grand Totals						
	Total Issued			Total Returned		
	Mail	In Person	Grand Total	Mail	In Person	Grand Total
Republican	1651	73	1724	359	73	432
Democratic	1807	91	1897	374	91	465
Alpharetta Spl.	14	0	14	0	0	0
Hapeville Spl.	6	0	7	0	0	0
Johns Creek Spl.	125	4	129	35	4	39
Milton Spl.	37	0	37	8	0	8
Sandy Springs Spl.	68	0	68	2	0	2
Total	3,708	168	3,876	778	168	946

Advance Voting Only (included in above totals)						
	Mon. 07/10	Tue. 07/11	Wed. 07/12	Thur. 07/13	Fri. 07/14	Total
North	0	0	0	0	0	0
South	0	0	0	0	0	0
Main	0	0	0	0	0	0
Total	0	0	0	0	0	0

Exhibit B

IN THE SUPERIOR COURT OF FULTON COUNTY

STATE OF GEORGIA

MS. ROSALIND LAKE and)
MR. MATTHEW L. HESS)
qualified and registered voters)
under Georgia law,)

Plaintiffs,)

v.)

CIVIL ACTION
FILE NO. 2006-CV-119207

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official capacity as Governor;)

STATE ELECTION BOARD; and,)

MS. GLORIA CHAMPION,)
Superintendent of Elections for Fulton)
County, Georgia; MS. JUANITA)
MARSHALL EBER, Chair of the Fulton)
County Board of Elections; MRS.)
CYNTHIA J. WILLIAMS, MR. HARRY)
W. MCDONALD, MR. FRANK B.)
STRICKLAND, and MR. SAMUEL P.)
WESTMORELAND,)

Defendants.)

AFFIDAVIT OF CLAUD L. MCIVER III

STATE OF GEORGIA

COUNTY OF FULTON

I, CLAUD L. MCIVER III having appeared before the undersigned officer duly
authorized to administer oaths and having been so sworn, state and depose as follows:

1.

My name is Claud L. McIver III. I am over 18 years of age, competent under federal and state law to make this affidavit and do so upon my own personal knowledge. This affidavit is made for use in the above-styled case.

2.

I am the Vice-Chair of the Georgia State Board of Elections. I have been member of the State Election Board since July 2005.

3.

In that capacity, I have been very involved in the issue of photo identification for voting. When SB 84 was being considered during the 2006 Regular Session ("the 2006 photo ID law"), I advocated for its passage, including the provisions for making voter identification cards ("VICs") available to voters at no charge, as well as ensuring that the cards were available at convenient locations in each county and would continue to be offered at all 60 Department of Driver Services ("DDS") locations at no charge. I also supported adequate funding from the General Assembly to pay for the equipment, supplies, training and support needed by the counties and for education efforts.

4.

During the 2006 Regular Session of the General Assembly, the legislature passed and Governor Perdue signed the 2006 photo ID law. The General Assembly appropriated \$800,000 to the State Election Board to provide for (a) the installation of equipment to allow every county voter registrar's office to produce a photo ID card for any voter in the county who is registered to vote in Georgia and needs a photo ID for voting, (b) the training for the

registrars to operate the equipment and (c) voter education. The State Election Board has carried out these functions, and the amount appropriated has been sufficient to accomplish the same.

5.

Upon passage of the 2006 Photo ID law and preclearance of the same by the United States Attorney General under Section 5 of the Voting Rights Act of 1965, 42 U.S.C. § 1973c, the State Election Board appointed me to oversee the tasks necessary to ensure that the counties received the machinery, supplies, training and support to produce and distribute the VICs.

6.

Our first task was to comply with the mandate in the 2006 Photo ID law requires that the State Election Board “provide each county board of registrars with the necessary equipment, forms, supplies, and training for the production of the Georgia voter identification cards and shall maintain such equipment.” The State Election Board has complied with those directives and will continue to do so.

7.

Following a state contracting process, a vendor was approved to provide the machinery, supplies, training and support to the counties. A mass training session was held at the Voter Registrars Association of Georgia on May 22 – 24, 2006, which was attended by representatives of 157 of the 159 county registrars. Many counties have also received on-site training from the vendor, as may have been required by the needs of a particular county. The training of registrars has been completed, and the equipment has been installed and is operational in every county registrar’s office. All registrars’ offices

are therefore ready and able to issue cards immediately and have begun doing so. As today, a total of eighty-three cards have been issued statewide.

8.

The state contract provides that the vendor must allow the State Election Board and all counties to purchase additional machines as they so desire at the same price charges for the first unit, which is approximately \$3500. The State Election Board has purchased two photo identification-producing machines so that additional training can be held at the SOS office if necessary and so that loaners are available if needed. At present, several of the state's large counties have also ordered additional units.

9.

In addition to charging the State Election Board with overseeing the acquisition of machinery to produce VICs and the training of election officials on the production of the same, the 2006 Photo ID law also required the State Election Board to adopt procedures for the application and issuance of the cards, including "such rules and regulations may further define or prescribe the types of documentation required under subsection (e) of this Code section." The State Election Board has complied with those directives as well. To that end, final rules were submitted to the United States Department of Justice for preclearance under Section 5 of the Voting Rights Act, 42 U.S.C. §1973c and were precleared June 27, 2006.

10.

Following preclearance of the rules, the State Election Board met as soon as possible, allowing time for the requisite notice of a public meeting. At that June 29,

2006 meeting, the Board instructed the Elections Division to notify registrars to begin issuing VICs immediately. The Elections Division did so that day.

11.

At that same June 29, 2006 meeting, the State Election Board approved a voter education piece, which is attached to my Affidavit as Exhibit 1. The piece will be handed out at the during early voting, which is set to begin five days from now on July 10 and will also be handed out at the polls on July 18, primary election day,. Many critics of the new law have alleged that voters will appear at the polls without the required photo ID and will be turned away, which is incorrect. Under the law, voters without one of the forms of required photo ID will be issued a provisional ballot and can vote that ballot. Those votes will be counted if voters provide one of the required forms of photo ID to the registrar within 48 hours. This is the same procedure used for a voter who appears at the polls and believes he or she is registered but whose name does not appear on the list of registered voters; those voters have 48 hours to establish that they are in fact registered. For voters who appear without the required photo ID (who are the source of the opponents' stated concern), the education piece attached as Exhibit 1 tells them what forms of photo ID which they may already have are acceptable. It also tells voters how to get a free photo ID from their county registrar of or the Department of Driver Services. Finally, the piece advises all voters that every registered voter is permitted to vote absentee by mail without a photo ID and without an excuse.

12.

The State Election Board has ordered these pieces printed for the large metro counties and that printing has begun; the counties have been instructed to distribute the

letters during early voting and at the polls on primary election day. For smaller counties, the State Election Board has provided the letter template, supplied the paper to the counties and instructed them to print the letters for distribution during early voting and on primary election day.

13.

As the representative of the State Election Board, I have produced and ordered to be aired both television and radio paid public service announcements. Those announcements provide information about the need to bring photo ID to the polls, the types of photo ID that are acceptable, how to get a free identification card and the ability of all voters to vote an absentee ballot by mail without having to provide an excuse or photo ID.

14.

The public service announcements will be aired beginning today by Northland Cable, which has 150 affiliates. The television spots are also being distributed by the Georgia Association of Broadcasters to all its affiliates, which include all Georgia television stations. The radio spots will be aired beginning Friday, July 7 on more than 100 Georgia stations, at a frequency of 3 times per day. A list of the stations is attached as Exhibit 2.

15.

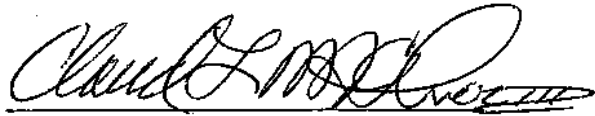
I have also been interviewed by numerous television and radio stations on the voter education aspects of this matter; those interviews have been aired in prime time. On Tuesday, July 11, 2006, I will be featured in a 30 minute radio show called "Georgia

Focus," that will air on 58 radio stations. The list of those stations is attached as Exhibit

3.

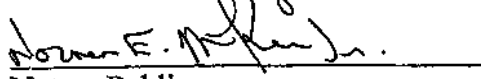
FURTHER AFFIANT SAYETH NOT.

This 5th day of July, 2006.



Claud L. McIver III

Sworn to and subscribed before me
this 5 day of July, 2006.



Notary Public

My commission expires:

Notary Public, DeKalb County, Georgia
My Commission Expires Sept. 26, 2009

Dear Georgia Voter,

Thank you for voting!

In 2006, the photo identification requirement for voters who cast their votes in person took effect. If you have a government issued photo ID (such as a Georgia driver's license or military identification card with a photo), this does NOT affect you.

Voters who cast their votes in person must show one of six forms of photo identification. If you vote ABSENTEE BY MAIL, you do NOT need a photo ID. These rules ONLY APPLY if you vote IN PERSON by absentee or on Election Day.

Here are the acceptable forms of photo identification:

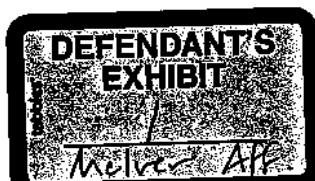
1. A Georgia driver's license or Department of Driver Services identification card;
2. A valid U.S. military identification card containing your photograph;
3. A valid photo identification card issued by any branch, department, agency, or entity of Georgia, any other state, or the U.S. authorized by law to issue personal identification;
4. A valid state or federal employee identification card containing your photograph issued by a branch, department, agency, or entity of the U.S., this state, or any county, municipality, board, authority or other entity of this state;
5. A valid U.S. passport; or
6. A valid tribal identification card containing your photograph.

If you do not have a Georgia driver's license or Georgia identification card, you can receive a FREE Georgia Voter Identification Card TODAY. You can get your FREE Georgia Voter Identification Card at your County Voter Registrar's office in the county where you live.

In order to get a FREE Georgia Voter Identification Card, you will need to give your County Voter Registrar:

1. a document to confirm your identity. It can be something with your picture on it or it can be a document that includes your full legal name and your date of birth. BUT, it must be one of the documents listed at the end of this letter; and,
2. a document showing your name and residential address. It can be any of the documents listed at the end of this letter.

You can use the same document to confirm your identity AND to show your residential address. If you have any questions, just call your local county Voter Registrar's office or visit the Secretary of State's web page at www.sos.state.ga.us for additional information.



Acceptable Documents That Have Your Picture On It

Student ID Card	Nursing Home Identification Card	Government Issued License
Transit Card	Employee Identification Card	Card accepted by a Gov't to get benefits or access to a gov't building
Pilot's License	Gov't Housing Authority ID Card	

Acceptable Documents That DO NOT Have Your Picture But DO Have Your Full Name and Date of Birth

Birth Certificate (original or certified copy)	Certificate of birth registration
Voter Registration Application (available at your County Voter Registrar's Office)	Court Records filed by you (or on your behalf)
Naturalization Documents	Copy of Marriage License Application
Your Federal or State Tax Return (for the previous year)	Government issued documents
Paycheck or Paystub (with employer name imprinted)	Annual Social Security Statement (original for previous year)
Medicare or Medicaid Statement (original received by you)	Certified School Transcript (preceding year)
Hospital Birth Certificate	Doctor's Record of Post-Natal Care (authenticated copy)
Federal Affidavit of Birth (Form DS-10)	

Acceptable Documents That Show Your Name and Residential Address

Voter Precinct Card	Utility or Cable Bill (last 60 days)	Bank Statement (last 60 days)
Valid Rental Contract (current year)	Receipt Payments –Rent (last 60 days)	Federal or State Tax Return (preceding year)
Homeowners Insurance Policy or Bill (current or preceding year)	Mortgage, payment coupon deed or property tax bill (current or preceding year)	Homestead Exemption Documentation W2 (preceding year)



AFFILIATES BY DMA LIST

Albany DMA

WALG*	Albany	1590	AM	Dougherty	News/Talk
WGPC*	Albany	1450	AM	Dougherty	Sports/Talk
WJYZ **	Albany	960	AM	Dougherty	Gospel
WOBB**	Albany	100.3	FM	Dougherty	Country
WQXZ	Cordele	98.3	FM	Crisp	Oldies
WDMG	Douglas	860	AM	Coffee	News/Talk
WDMG-FM	Douglas	97.9	FM	Coffee	Classic Hits
WRDO	Fitzgerald	96.9	FM	Ben Hill	AC
WMTM-FM	Moultrie	93.9	FM	Colquitt	Oldies
WMTM	Moultrie	1300	AM	Colquitt	Gospel
WTIF	Tifton	1340	AM	Tift	News/Talk
WTIF-FM	Tifton	107.5	FM	Tift	News/Talk

Atlanta DMA

WGAU	Athens	1340	AM	Clarke	News/Talk
WGST	Atlanta	640	AM	Fulton	News/Talk
WBAF	Barnesville	1090	AM	Lamar	Country
WPPL	Blue Ridge	103.9	FM	Fannin	Country
WMOQ	Bostwick	92.3	FM	Morgan	Country
WJTH	Calhoun	900	AM	Gordon	Country
WCHK	Canton	1290	AM	Cherokee	Country
WLBB*	Carrollton	1330	AM	Carroll	News/Talk

* Stations-share network clearance in market
111 Affiliates total



June 2006

Atlanta DMA (continued)

WBTR*	Carrollton	92.1	FM	Carroll	Country
WYXC	Cartersville	1270	AM	Bartow	News/Talk
WGAA	Cedartown	1340	AM	Polk	Full Service
WRBN*	Clayton	104.1	FM	Rabun	AC
WGHC*	Clayton	1370	AM	Rabun	Adult Standard
WRWH	Cleveland	1350	AM	White	Country
WJJC	Commerce	1270	AM	Jackson	Country
WCON	Cornelia	1450	AM	Habersham	Gospel
WCON-FM	Cornelia	99.3	FM	Habersham	Country
WKHC	Dahlonega	104.3	FM	Lumpkin	Country
WPGY	Ellijay	1560	AM	Gilmer	Country
WLJA	Ellijay	93.5	FM	Gilmer	Full Service
WDUN	Gainesville	550	AM	Hall	News/Talk
WDDK	Greensboro	103.9	FM	Greene	AC
WKEU	Griffin	1450	AM	Spalding	Oldies
WVCC*	LaGrange	720	AM	Troup	News/Talk
WMGP*	LaGrange	98.1	FM	Troup	Hot AC
WCOH	Newnan	1400	AM	Coweta	Country
WZOT	Rockmart	1220	AM	Polk	Full Service
WRGA	Rome	1470	AM	Floyd	News/Talk
WSRM	Rome	95.3	FM	Floyd	News/Talk
WKNG	Tallapoosa	1060	AM	Haralson	Country
WTGA	Thomaston	1590	AM	Upton	News/Talk
WTGA-FM	Thomaston	95.3	FM	Upton	Country
WIMO	Winder	1300	AM	Barrow	Full Service

* Stations-share network clearance in market
111 Affiliates total

Augusta DMA

WKSP*	Augusta	105.7	FM	Richmond	Country
WSGF*	Augusta	1340	AM	Richmond	S. Gospel
WPEH	Louisville	1420	AM	Jefferson	Country
WPEH-FM	Louisville	92.1	FM	Jefferson	Country
WHKN	Millen	94.9	FM	Jenkins	Country
WXRS	Swainsboro	1590	AM	Emanuel	News/Talk
WXRS-FM	Swainsboro	100.5	FM	Emanuel	Country
WTWA	Thomson	1240	AM	McDuffie	Full Service
WLOV	Washington	1370	AM	Wilkes	Country
WXKT	Washington	100.1	FM	Wilkes	Country

Chattanooga, TN DMA

WBLJ	Dalton	1230	AM	Whitfield	News/Talk
WQCH	Lafayette	1590	AM	Walker	Country
WZQZ	Summerville	1180	AM	Chattooga	Full Service
WKWN	Trenton	1420	AM	Dade	News/Talk

Columbus DMA

WISK-FM	Americus	98.7	FM	Sumter	Country
WRCG	Columbus	1420	AM	Muscogee	News/Talk

Dothan, AL DMA

WBBK	Blakely	1260	AM	Early	Country
WGMK	Donalsonville	106.3	FM	Seminole	AC
WSEM	Donalsonville	1500	AM	Seminole	Talk/Country

Greenville, SC DMA

WSGC	Elberton	1400	AM	Elbert	Oldies
WSGC	Elberton	92.1	FM	Elbert	Country
WKLY	Hartwell	980	AM	Hart	Country
WNEG	Toccoa	630	AM	Stephens	Full Service

Jacksonville, FL DMA

WKUB	Blackshear	105.1	FM	Pierce	Country
WFNS	Blackshear	1350	AM	Pierce	News/Sports
WSFN	Brunswick	790	AM	Glynn	Sports/Talk
WWGA	Waycross	1230	AM	Ware	News/Talk

Macon DMA

WDXQ-FM	Cochran	96.7	FM	Bleckley	Classic Hits
WDXQ	Cochran	1440	AM	Bleckley	Classic Hits
WMLT	Dublin	1330	AM	Laurens	Full Service
WUFF	Eastman	710	AM	Dodge	Country
WUFF-FM	Eastman	97.5	FM	Dodge	Country
WCEH	Hawkinsville	610	AM	Pulaski	Country
WRBV*	Macon	101.7	FM	Bibb	Adult R&B
WYNF*	Macon	96.9	FM	Bibb	Modern Rock
WKZR	Milledgeville	102.3	FM	Baldwin	Country
WMVG	Milledgeville	1450	AM	Baldwin	Sports/Talk
WMNZ	Montezuma	1050	AM	Macon	Full Service
WSNT-FM	Sandersville	99.9	FM	Washington	Country
WSNT	Sandersville	1490	AM	Washington	Urban
WRPG	Hawkinsville	103.9	FM	Pulaski	News/Talk
WNNG	Warner Robins	1350	AM	Houston	Adult Standard

Savannah DMA

WAJQ	Alma	1400	AM	Bacon	Gospel
WAJQ-FM	Alma	104.3	FM	Bacon	Country
WUFE	Baxley	1260	AM	Appling	Gospel
WCLA	Claxton	1470	AM	Evans	Gospel-Full Svc
WVOH	Hazlehurst	920	AM	Jeff Davis	Gospel
WVOH-FM	Hazlehurst	93.5	FM	Jeff Davis	Country
WSSJ	Hinesville	92.3	FM	Liberty	Smooth Jazz
WIFO	Jesup	105.5	FM	Wayne	Country
WLOP	Jesup	1370	AM	Wayne	Country
WYUM	Mt. Vernon	101.7	FM	Montgomery	Country
WSOK	Savannah	1230	AM	Chatham	Gospel
WTKS	Savannah	1290	AM	Chatham	News/Talk
WPMX	Statesboro	102.9	FM	Bulloch	AC
WZBX	Sylvania	106.5	FM	Screven	Country
WSYL	Sylvania	1490	AM	Screven	Country
WVOP	Vidalia	970	AM	Toombs	Oldies

Tallahassee, FL DMA

WMGR	Bainbridge	930	AM	Decatur	Full Service
WGRA	Cairo	790	AM	Grady	Full Service
WBTY	Homerville	98.7	FM	Clinch	Oldies
WSFB	Quitman	1490	AM	Brooks	Adult Standard
WPAX	Thomasville	1240	AM	Thomas	Adult Standard
WAAC*	Valdosta	92.9	FM	Lowndes	Country
WGOV*	Valdosta	950	AM	Lowndes	Urban
WGOV(simulcast)	Valdosta	96.7	FM	Lowndes	Urban

* Stations-share network clearance in market
111 Affiliates total



"Georgia Focus" Public Affairs Program Affiliates

<u>Call Letters</u>	<u>Frequency</u>	<u>Market</u>	<u>Local Air Time</u>
WRAK	97.3	Albany	6:00am/Sun
WOBB	100.3	Albany	11:30pm/Sat
WJIZ	96.3	Albany	6:00am/Sun
WJYZ	96.0	Albany	6:00am/Sun
WBZY	96.7	Atlanta	6:00am/Sun
WKLS	96.1	Atlanta	6:00am/Sun
WLTM	94.9	Atlanta	7:00am/Sat
WKSP	96.3	Augusta	7:00am/Sun
WSGF	1340	Augusta	7:00am/Sun
WPCH	1380	Augusta	7:00am/Sun
WEKL	102.3	Augusta	7:30am/Sat
WBBQ	104.3	Augusta	7:30am/Sat
WIBL	105.7	Augusta	7:30am/Sat
WPRW	107.7	Augusta	7:00am/Sun
WMGR	930	Bainbridge	5:30am/Sat
WQMT	98.9	Chatsworth	6:00am/Sun
WQXZ	98.3	Cordele	6:00am/Sun
WBLJ	1230	Dalton	8:00am/Sat
WYYU	104.5	Dalton	5:30am/Sun
WGMK	106.3	Donalsonville	5:30am/Sat
WLJA	93.5	Ellijay	6:00am/Sun
WPGY	1560	Ellijay	6:00am/Sun
WRDO	96.9	Fitzgerald	5:30am/Sat
WJFN	610	Hawkinsville	6:00am/Sun
WVOH	920	Hazlehurst	5:30am/Sat
WVOH	93.5	Hazlehurst	5:30am/Sat
WIFO	105.5	Jesup/Brunswick	6:00am/Sun
WLOP	1370	Jesup	6:00am/Sun
WMAX	98.1	LaGrange	5:00am/Sat
WVCC	720	LaGrange	7:30am/Sat
WPEH	1420	Louisville	8:00pm/Sun
WPEH	92.1	Louisville	8:00pm/Sun
WQBZ	106.3	Macon	6:00am/Sun
WRBV	101.7	Macon	6:00am/Sun
WLCG	1280	Macon	6:00am/Sun
WIBB	97.9	Macon	6:00am/Sun



"Georgia Focus" Public Affairs Network Affiliate List Page 2

WYNF	96.5	Macon	6:00am/Sun
WEBL	102.5	Macon	6:00am/Sun
WMWR	1670	Macon	6:00am/Sun
WMVG	1450	Milledgeville	7:00am/Sun
WHKN	94.9	Millen	10:30am/Sat
WCOH	1400	Newnan	9:00am/Sat
WRGA	1470	Rome	5:30am/Sat
WTKS	1290	Savannah	6:00am/Sun
WSOK	1230	Savannah	6:00am/Sun
WQBT	94.1	Savannah	6:00am/Sun
WAEV	97.3	Savannah	6:00am/Sun
WYKZ	98.7	Savannah	6:00am/Sun
WLVH	101.1	Savannah	6:00am/Sun
WPMX	102.9	Statesboro	10:30am/Sat
WZQZ	1180	Summerville	6:30am/Sun
WPAX	1240	Thomasville	5:30am/Mon
WTWA	1240	Thomson	10:05am/Sat
WNEG	630	Toccoa	6:30am/Sun
WRPG	103.9	Warner Robins	6:00am/Sun
WNNG	1350	Warner Robins	10:30am/Sun

58 Affiliates as of 1-2-06

Exhibit C

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

MS. ROSALIND LAKE and)
MR. MATTHEW L. HESS,)

Plaintiffs,)

v.)

Civil Action No.2006CV119207

HON. SONNY PERDUE, individually)
and in his official capacity as Governor;)
STATE ELECTION BOARD; et al.,)

Defendants.)

AFFIDAVIT OF THOMAS BLAKE USSERY

STATE OF GEORGIA

COUNTY OF FULTON

I, Thomas Blake Ussery, having appeared before the undersigned officer
duly authorized to administer oaths and having been so sworn, state and depose as
follows:

1.

My name is Thomas Blake Ussery. I am over 18 years of age and competent
under federal and state law to make this affidavit and do so upon my own personal
knowledge. This affidavit is made for use in the above-styled case.

2.

I am employed as a Redistricting Services Specialist in the Office of Legislative and Congressional Reapportionment. Our office provides technical support for redistricting actions by the Georgia General Assembly. At the request of legislators, I also provide technical assistance for local government redistricting plans. I have been employed in the office since October 2001 providing assistance to legislators in drawing maps for redistricting plans.

3.

The redistricting software we use to create maps is called Maptitude. In redistricting work, I often have to locate particular addresses on a map of the state or of a particular jurisdiction in the state. I do so by using the Maptitude software to geocode the location of the address I am given. I physically enter the address, and Maptitude then employs a database of streets with numbered ranges of addresses to pinpoint the specific location of a physical address or a location within a certain address range. Maptitude then makes a geographic representation of the location with a star or other symbol.

4.

Using Maptitude, I created the map attached as Exhibit 1 to my Affidavit.

5.

I was provided with a list of addresses of service centers of the Department of Driver Services. That list is attached as Exhibit 2 to this Affidavit. On Exhibit 1, the locations of the DDS service centers are indicated by blue stars.


6.

Additionally, Maptitude has a layer which shows the county seats in the state; the registrars' offices are all located in the county seats. I turned on that layer and marked the cities in each county where the registrar's offices are located with a red star, as indicated on Exhibit 1.

7.

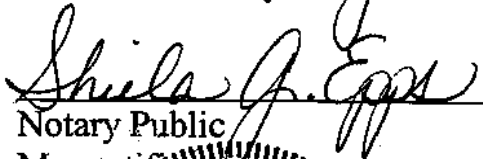
Exhibit 1 accurately reflects the location of the DDS service centers and the voter registrar's offices in Georgia. Among other things, Exhibit 1 shows that in Fulton and DeKalb Counties, there are seven locations where voters can obtain photo ID cards for voting: three DDS service centers in Fulton County (one located within the City of Atlanta), two DDS service centers in DeKalb County, and one in the registrar's office in each county.

Further affiant sayeth not.



BLAKE USSEKY

Sworn to and subscribed before me
this 5th day of July, 2006.

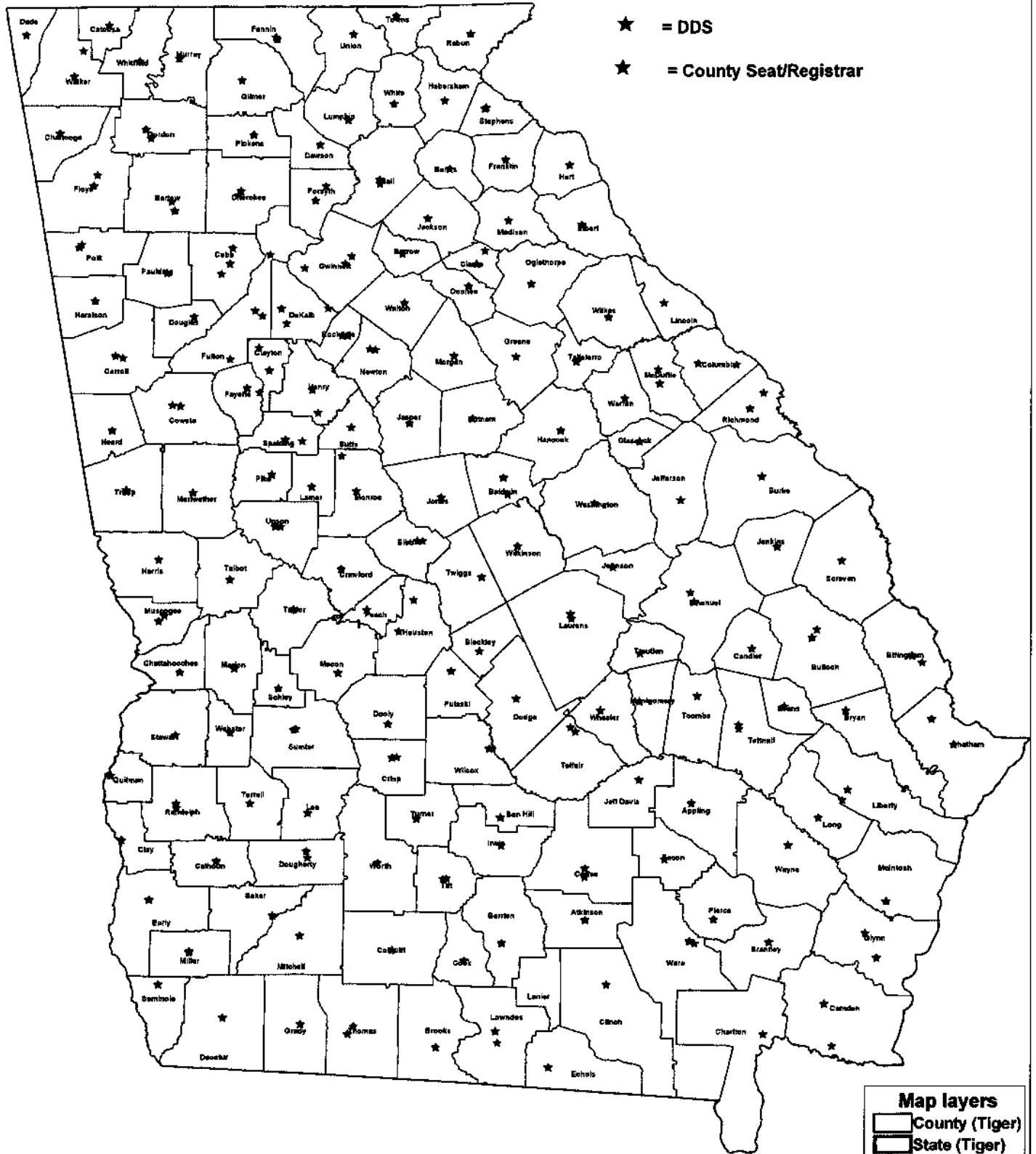


Notary Public

My certificate expires:



DDS/County Registrar Locations



★ = DDS
 ★ = County Seat/Registrar

Map layers

- County (Tiger)
- State (Tiger)
- ★ County Seats

0 10 20 30
 Miles

EXHIBIT 1

**Georgia Department of Driver Services Customer Service Centers
Sorted by County**

CSC Number	Full Address	GA City	GA County
33	200 Carl Vinson Rd., Milledgeville 31061	Milledgeville	Baldwin
3	1300 Joe Frank Harris Pkwy., Cartersville 30120	Cartersville	Bartow
53	833 Central City Park, Macon 31202	Macon	Bibb
45	202 Randy Lowery Rd., Statesboro 30461	Statesville	Bulloch
88 - CDL Only	149 Riverview Park Rd., Jackson 30233	Jackson	Butts
223 - Part Time	333 West Ashley St., Kingsland 31548	Kingsland	Camden
4	512 Old Newnan Rd., Carrollton 30117	Carrollton	Carroll
42	117 Eisenhower Dr., Savannah 31406	Savannah	Chatham
28	1085 Marietta Hwy., Canton 30114	Canton	Cherokee
32	1505 US Hwy. 29 North, Athens 30601	Athens	Clarke
53	5036 Hwy 85, Forest Park 30297	Forest Park	Clayton
86	1605 County Services Rd., Marietta 30008	Marietta	Cobb
56	2800 Canton Rd. Suite 1000, Marietta 30066	Marietta	Cobb
36	348 Thomas Frier Sr. Dr., Douglas 31535	Douglas	Coffee
63	630 Ronald Regan Pkwy., Evans 30809	Evans	Columbia
24	201 Temple Ave., Newnan 30263	Newnan	Coweta
30	409 South Midway Rd., Cordele 31015	Cordele	Crisp
52	2801 Candler Rd., Decatur 30034	Decatur	Dekalb
61	8040 Rockbridge Rd., Lithonia 30058	Lithonia	Dekalb
40	2062 Newton Rd., Albany 31701	Albany	Dougherty
62	2792 Hwy. 21 South, Rincon 31326	Rincon	Effingham
232 - Part Time	45 Forest Ave., Elberton 30635	Elberton	Elbert
19	994 Hwy 1 North, Swainsboro 30401	Swainsboro	Emanuel
27	159 Industrial Blvd., Blue Ridge 30513	Blue Ridge	Fannin
87	278 McElroy Rd., Fayetteville 30215	Fayetteville	Fayette
38	3386 Martha Berry Hwy. NE, Rome 30165	Rome	Floyd
37	4055 County Way, Cumming 30040	Cumming	Forsyth
50	445 Capitol Avenue, Atlanta 30334	Atlanta	Fulton
58	8610 Roswell Rd., St 710, Atlanta 30359	Sandy Springs	Fulton
60	5374 Shannon Mall #4013, Union City 30291	Union City	Fulton
23	101 Perry Lane Rd., Brunswick 31525	Brunswick	Glynn
43	402 Bellwood Rd., Calhoun 30701	Calhoun	Gordon
54	Hurricane Shoals Rd., Lawrenceville 30043	Lawrenceville	Gwinnett
64	2211 Beaver Ruin Rd. Suite 100, Norcross 30071	Norcross	Gwinnett
6	1010 Aviation Blvd., Gainesville 30501	Gainesville	Hall
94	618 Tanger Blvd., Locust Grove 30248	Locust Grove	Henry
61	198 Carl Vinson Pkwy., Warner Robins 31088	Warner Robins	Houston
20	1504 Telfair St., Dublin 31021	Dublin	Laurens
11	2301 Airport Rd., Hinesville 31313	Hinesville	Liberty
31	371 Gil Harbin Ind. Blvd., Valdosta 31601	Valdosta	Lowndes
25	172 Bob Kirk Rd., Thompson 30824	Thompson	McDuffie
212 - Part Time	308 East Crawford St., Colquitt 39837	Colquitt	Miller
55	8397 Macon Rd., Midland 31820	Columbus	Muscogee
8	8134 Geiger St., Covington 30014	Covington	Newton
29	1000 North Main St., Cedartown 30125	Cedartown	Polk
240 - Part Time	South Side Plaza Bleakly St., Cuthbert 39840	Cuthbert	Randolph
51	3423 Mike Padgett Hwy., Augusta 30916	Augusta	Richmond
46	2206 East View Pkwy., Conyers 30013	Conyers	Rockdale
1	1313 Arthur K. Bolton Pkwy., Griffin 30223	Griffin	Spalding
7	East Doyle St., Toccoa 30577	Toccoa	Stephens
10	506 West Lamar St., Americus 31709	Americus	Sumter
18	HC01 Box 175, Reidsville 30453	Reidsville	Tattal
16	Route 1 Box 246, Helena 31037	Helena	Telfair
12	4800 US 84 Bypass, Thomasville 31792	Thomasville	Thomas

EXHIBIT 2

Georgia Department of Driver Services Customer Service Centers

13	413 Fulwood Blvd., Tifton 31794	Tifton	Tift
2	2573 Hamilton Rd., LaGrange 30240	Lagrange	Troup
26	281 Knight Trail, Thomaston 30286	Thomaston	Upson
41	156 Pin Oak Dr., Rock Springs 30739	Rock Springs	Walker
22	3029 Memorial Dr., Waycross 31501	Waycross	Ware
5	104 South Thomson Ave., Dalton 30720	Dalton	Whitfield

Exhibit D

CONDENSED TRANSCRIPT

IN THE SUPERIOR COURT OF DEKALB COUNTY
STATE OF GEORGIA

MARGARET L. BERRY,
Plaintiff,

vs.

CIVIL ACTION
NO. 06CV4751-4

HON. SONNY PERDUE,
individually and in his
official capacity as Governor;
STATE ELECTION BOARD; et al,
Defendants.

DEPOSITION OF

ROSALIND ELAINE LAKE

June 23, 2006
2:08 p.m.

2000 Midtown Proscenium
1170 Peachtree Street, N.E.
Atlanta, Georgia

Candace L. Payne, CCR-B-2317

Alexander Gallo Associates, LLC
COURT REPORTING VIDEO SERVICES
TRIAL PRESENTATIONS

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<p style="text-align: center;">1</p> <p style="text-align: center;">IN THE SUPERIOR COURT OF DEKALB COUNTY STATE OF GEORGIA</p> <p>MARGARET L. BERRY, Plaintiff,</p> <p>vs. CIVIL ACTION NO. 06CV4751-4</p> <p>HON. SONNY PERDUE, individually and in his official capacity as Governor; STATE ELECTION BOARD; et al, Defendants.</p> <p>-----</p> <p style="text-align: center;">DEPOSITION OF ROSALIND ELAINE LAKE</p> <p style="text-align: center;">June 23, 2006 2:08 p.m.</p> <p style="text-align: center;">2000 Midtown Proscenium 1170 Peachtree Street, N.E. Atlanta, Georgia</p> <p style="text-align: center;">Candace L. Payne, CCR-B-2317</p>	<p style="text-align: center;">3</p> <p>1 APPEARANCES OF COUNSEL (continued)</p> <p>2</p> <p>3 APPEARING ON BEHALF OF DEKALB COUNTY:</p> <p>4 DUANE PRITCHETT, County Attorney</p> <p>5 DEKALB LAW DEPARTMENT</p> <p>6 1300 Commerce Drive</p> <p>7 Fifth Floor</p> <p>8 Decatur, Georgia 30030</p> <p>9 (404) 371-3011</p> <p>10 E-mail: ddpritchett@co.dekalb.ga.us</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: center;">2</p> <p>1 APPEARANCES OF COUNSEL</p> <p>2</p> <p>3 APPEARING ON BEHALF OF THE PLAINTIFF:</p> <p>4 JENNIFER AUER JORDAN, Attorney at Law</p> <p>5 THE BARNES LAW GROUP, LLC</p> <p>6 Post Office Box 489</p> <p>7 Marietta, Georgia 30061</p> <p>8 (770) 419-8505</p> <p>9 (770) 590-8958 (facsimile)</p> <p>10 E-mail: jennifer@barneslawgroup.com</p> <p>11</p> <p>12 APPEARING ON BEHALF OF THE DEFENDANTS HON.</p> <p>13 SONNY PERDUE and STATE ELECTION BOARD:</p> <p>14 ANNE W. LEWIS, Attorney at Law</p> <p>15 STRICKLAND BROCKINGTON LEWIS, LLP</p> <p>16 2000 Midtown Proscenium</p> <p>17 1170 Peachtree Street, NE</p> <p>18 Atlanta, Georgia 30309-7691</p> <p>19 (678) 347-2200</p> <p>20 (678) 347-2210 (facsimile)</p> <p>21 E-mail: awl@sblaw.net</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: center;">4</p> <p>1 Deposition of Rosalind Lake</p> <p>2 June 23, 2006</p> <p>3</p> <p>4 MS. LEWIS: This will be the deposition</p> <p>5 of Rosalind Lake taken by the Defendants in</p> <p>6 this case. The deposition of Ms. Lake is</p> <p>7 taken on cross-examination for the purpose of</p> <p>8 discovery and all other purposes authorized</p> <p>9 under the Civil Practice Act.</p> <p>10 All objections, except as to form of</p> <p>11 the question and the responsiveness of the</p> <p>12 answer, are reserved until such time as the</p> <p>13 deposition is used.</p> <p>14 Is that all right with y'all?</p> <p>15 MS. JORDAN: Yes.</p> <p>16 MR. PRITCHETT: Sure.</p> <p>17 MS. LEWIS: Did y'all talk about</p> <p>18 reading and signing?</p> <p>19 MS. JORDAN: No. What we'll do is I</p> <p>20 will reserve -</p> <p>21 MS. LEWIS: Okay.</p> <p>22 MS. JORDAN: - making any call on that</p> <p>23 until afterwards.</p> <p>24 MS. LEWIS: Okay. Ms. Lake, we got all</p> <p>25 of that out of the way.</p>



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<p>5</p> <p>1 Can you swear the witness, please?</p> <p>2 ROSALIND ELAINE LAKE, having been first</p> <p>3 duly sworn, was examined and testified as</p> <p>4 follows:</p> <p>5 EXAMINATION</p> <p>6 BY-MS.LEWIS:</p> <p>7 Q. Ms. Lake, can you state your full</p> <p>8 name for the record?</p> <p>9 A. Rosalind Elaine Lake.</p> <p>10 Q. Okay. And we met when you came</p> <p>11 in, but let me tell you again I'm Ann Lewis;</p> <p>12 and I represent the Governor's Office, and</p> <p>13 the Secretary of State and the State Election</p> <p>14 Board in this case that's been filed in</p> <p>15 Dekalb County. Mr. Pritchett represents</p> <p>16 Ms. Latimore and the Dekalb County Board of</p> <p>17 Elections.</p> <p>18 The questions I am going to ask you</p> <p>19 today are just designed to find out about</p> <p>20 your claims. We are not trying to trick you.</p> <p>21 If I talk too fast, tell me to slow down. If</p> <p>22 I ask you a question you don't understand,</p> <p>23 tell me to ask a better question. If you</p> <p>24 need to take a break, you just let me know.</p> <p>25 The only thing I will ask is if you will</p>	<p>7</p> <p>1 Q. Okay. Are you divorced?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And when did you get</p> <p>4 divorced?</p> <p>5 A. '83.</p> <p>6 Q. Do you have any children?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. How many children do you</p> <p>9 have?</p> <p>10 A. Three.</p> <p>11 Q. And what are their names?</p> <p>12 A. In age group?</p> <p>13 Q. Yeah. You can tell me their names</p> <p>14 and their ages.</p> <p>15 A. I meant by age, order of age?</p> <p>16 Q. Yeah. That's fine.</p> <p>17 A. Okay. Brian Keith Lake, 29,</p> <p>18 Timothy Michael Lake, 26, going to be 27 next</p> <p>19 month, Mia G. Lake, 26.</p> <p>20 Q. Okay. Are Mia and Timothy, are</p> <p>21 they twins?</p> <p>22 A. No.</p> <p>23 Q. No? Just born close together?</p> <p>24 A. My children - do I have to tell</p> <p>25 that?</p>
<p>6</p> <p>1 answer the last question before take a break,</p> <p>2 but we are happy to take a break any time you</p> <p>3 need to. And if you need anything else, just</p> <p>4 let us know. Okay?</p> <p>5 And if you will, it will be easier on</p> <p>6 the court reporter if you be sure to say</p> <p>7 "yes" or "no" in response to the questions</p> <p>8 rather than nodding your head or saying</p> <p>9 "uh-huh" or "uh-uh," because it's hard for</p> <p>10 her to take down, and then, when we go back</p> <p>11 and read it, it's sometimes hard to</p> <p>12 distinguish whether your answer was yes or</p> <p>13 no. Okay?</p> <p>14 A. Yes.</p> <p>15 Q. Have you ever been known by any</p> <p>16 name other than Rosalind Elaine Lake?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. What other names have you</p> <p>19 had?</p> <p>20 A. Just my maiden name, Hawker,</p> <p>21 H-a-w-k-e-r.</p> <p>22 Q. And when were you married?</p> <p>23 A. 1973. May 5th, 1973.</p> <p>24 Q. And are you still married?</p> <p>25 A. No.</p>	<p>8</p> <p>1 Q. It's okay.</p> <p>2 MS. JORDAN: Yeah. It's fine.</p> <p>3 THE WITNESS: My children are adopted.</p> <p>4 Q. (By Ms. Lewis) Okay.</p> <p>5 A. Three of them.</p> <p>6 Q. Okay. All three of them?</p> <p>7 A. Yes, ma'am.</p> <p>8 Q. And do all your children live here</p> <p>9 in Atlanta?</p> <p>10 A. Yes.</p> <p>11 Q. And would you say you see them</p> <p>12 pretty regularly?</p> <p>13 A. No. My oldest son is very busy.</p> <p>14 He is a paramedic, and he's really busy; and</p> <p>15 they live way out in the country.</p> <p>16 Q. Okay. How about your other two?</p> <p>17 A. My other two, she lives alone, and</p> <p>18 she has four children. And Timothy, right</p> <p>19 now he's staying with me in transition to get</p> <p>20 his own place, but he was living with my</p> <p>21 daughter for over a year and my son before</p> <p>22 that.</p> <p>23 Q. And where do you and Timothy live?</p> <p>24 A. I live at Maggie Russell Towers.</p> <p>25 Q. Okay. Did you say he lives there</p>



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9

1 with you?
 2 A. He's visiting, yes.
 3 Q. Visiting? Okay. And where is
 4 Maggie Russell Towers?
 5 A. 400 Ralph McGill Boulevard.
 6 Q. Is that in Fulton or Dekalb
 7 County?
 8 A. Fulton.
 9 Q. Okay. What's your date of birth?
 10 A. 7/14/46.
 11 Q. And what is your Social Security
 12 number?
 13 A. 124-36-0742.
 14 Q. Other than Rosalind Elaine Hawker,
 15 have you ever been known by any other name?
 16 A. No, I have not.
 17 Q. Have you ever had your deposition
 18 taken before?
 19 A. No, I have not.
 20 Q. Have you ever been involved -- oh,
 21 I'm sorry.
 22 THE WITNESS: When I got my disability,
 23 that wouldn't be no deposition, right?
 24 MS. JORDAN: No. No.
 25 THE WITNESS: Okay.

11

1 A. Not really because I was in a car
 2 accident, but I only get like \$100 or
 3 something like that. That's not really a
 4 lawsuit, no.
 5 Q. Did you have a lawyer in that
 6 case?
 7 A. No.
 8 Q. You just settled it with the
 9 insurance company?
 10 A. Yeah; outside court. Outside.
 11 Q. Did you file a lawsuit over it?
 12 A. No, not that I remember. See,
 13 I'll be 60 next month. So that's way back.
 14 I don't remember all that when I was young.
 15 Q. How long ago was your car wreck?
 16 A. About -- I guess about 35 years
 17 ago. I was trying to remember the number.
 18 Q. That's okay. That's close enough.
 19 And other than that settlement of that
 20 car wreck, you have never been involved in
 21 any other kind of claim?
 22 A. Oh, yes.
 23 Q. Okay.
 24 A. I forgot. When I was 16 -- it's
 25 really funny. It's a funny story. I got my

10

1 MS. JORDAN: The hearing. She went to
 2 the disability hearing. So no.
 3 Q. (By Ms. Lewis) Did you get your
 4 disability from Social Security?
 5 A. Disability for --
 6 THE WITNESS: I don't know what she
 7 means.
 8 Q. (By Ms. Lewis) Okay. Let me try
 9 that --
 10 A. I got SSI.
 11 Q. Okay. SSI. All right. Do you
 12 have any other kind of disability payments;
 13 Workers' Comp or anything like that?
 14 A. Just say no? I am used to saying
 15 no, ma'am.
 16 Q. No. You can say no. You don't
 17 need to say no, ma'am.
 18 A. I am just in the habit of saying
 19 it.
 20 Q. That's okay.
 21 A. No.
 22 Q. You can actually say either one,
 23 whichever makes you comfortable.
 24 Okay. Have you ever been involved in a
 25 lawsuit, other than this one?

12

1 foot caught in a train door in the subway,
 2 but I didn't know that it was in the subway
 3 door; and I looked out, and I saw my sneaker.
 4 And I looked in, and I said, "Oh, my foot is
 5 caught." And so I went against like with
 6 transit, but my mother, she's like backwards;
 7 and so she didn't -- I didn't get anything,
 8 but they tried to get me to sue transit.
 9 Q. Okay.
 10 A. I could be rich now.
 11 Q. Who tried to get you to do that?
 12 A. The place where I worked at the
 13 hospital part-time.
 14 Q. But you didn't do it?
 15 A. No. My mother wouldn't do it.
 16 Q. All right.
 17 A. She's very backwards. I forgot
 18 about that.
 19 Q. That's all right.
 20 A. But that don't matter since I
 21 didn't get anything, right?
 22 Q. That's right. So can you think of
 23 anything else where you had a claim against
 24 anybody?
 25 A. No; except my husband.



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<p>13</p> <p>1 Q. For your divorce?</p> <p>2 A. (Witness nods head.)</p> <p>3 Q. Now, did you --</p> <p>4 A. I got a lot of money.</p> <p>5 Q. Okay.</p> <p>6 A. I got mad, and I got a lot of</p> <p>7 money.</p> <p>8 Q. Did you get divorced here in</p> <p>9 Georgia?</p> <p>10 A. No.</p> <p>11 Q. Where did you get divorced?</p> <p>12 A. In Philadelphia. In Harrisburg,</p> <p>13 Pennsylvania.</p> <p>14 Q. Okay. So you lived in New York</p> <p>15 growing up?</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. And then where did you move after</p> <p>18 New York?</p> <p>19 A. Upstate New York, and I worked for</p> <p>20 IBM, and then, after that, I met my husband,</p> <p>21 came back to New York, got married. That's</p> <p>22 it.</p> <p>23 Q. And y'all lived in New York?</p> <p>24 A. For a while. Then we moved to</p> <p>25 Harrisburg, Pennsylvania.</p>	<p>15</p> <p>1 computer, whatever, and we used to work on</p> <p>2 that; and I did the inspection of it.</p> <p>3 Q. And after you had children, did</p> <p>4 you work?</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. Okay. And where did you work</p> <p>7 then?</p> <p>8 A. Before -- we skipped -- we skipped</p> <p>9 in Pennsylvania, before the children, I</p> <p>10 worked at BlueCross & BlueShield, and I was a</p> <p>11 claim adjuster; you know, what they call</p> <p>12 missing headers. The doctors would send in</p> <p>13 the claims, and they forget to put all the</p> <p>14 information on there right. So I worked in</p> <p>15 microfilm, and I did the missing headers. I</p> <p>16 did that.</p> <p>17 Q. When you said "we skipped," what</p> <p>18 do you mean?</p> <p>19 A. Mean that you skipped -- you went</p> <p>20 to New York and asked me what I did there and</p> <p>21 skipped what I did in Pennsylvania when I was</p> <p>22 married.</p> <p>23 Q. Okay.</p> <p>24 A. I worked all the time I was there.</p> <p>25 Q. Okay. When you were growing up</p>
<p>14</p> <p>1 Q. Where did you move after you lived</p> <p>2 in Harrisburg?</p> <p>3 A. Well, I didn't want to move, but I</p> <p>4 had three children by myself; and so I moved</p> <p>5 back with my mom in New York for a while,</p> <p>6 until the children were about five, and then</p> <p>7 I moved to Florida with my brother. And I</p> <p>8 stayed there for 16 years, raised my children</p> <p>9 in Miami, Florida, in Coconut Grove they</p> <p>10 called it.</p> <p>11 Q. And then where did you move?</p> <p>12 A. I stayed there for 16 years, and</p> <p>13 I've only been here four years.</p> <p>14 Q. You moved to Atlanta from Coconut</p> <p>15 Grove?</p> <p>16 A. Yes, because all my children moved</p> <p>17 here. So I was by myself. I was lonesome.</p> <p>18 Q. What did you do in -- you told me</p> <p>19 you worked at IBM until you got married?</p> <p>20 A. Uh-huh.</p> <p>21 Q. Is that right?</p> <p>22 A. Yes, ma'am.</p> <p>23 Q. Okay. What did you do there?</p> <p>24 A. I was -- you know how in the space</p> <p>25 shuttle they got these little panels and the</p>	<p>16</p> <p>1 and you got your foot stuck in the train, you</p> <p>2 were working at a hospital, right?</p> <p>3 A. Yeah. I worked at Beth Israel</p> <p>4 Hospital as a diet aide at 16, 17 years old.</p> <p>5 I think it was 17.</p> <p>6 Q. Okay.</p> <p>7 A. And I volunteered before then --</p> <p>8 Q. And you did it --</p> <p>9 A. -- as a volunteer.</p> <p>10 Q. I'm sorry. All right. And when</p> <p>11 you got married, you moved to Harrisburg?</p> <p>12 A. Yes.</p> <p>13 Q. Is that when you worked at IBM?</p> <p>14 A. No, ma'am.</p> <p>15 Q. Okay. When did you work there?</p> <p>16 A. Before I got married.</p> <p>17 Q. Before you got married, in New</p> <p>18 York?</p> <p>19 A. Before I met my husband.</p> <p>20 Q. And then did you work anywhere</p> <p>21 else in New York before you got married?</p> <p>22 A. A lot of different places, you</p> <p>23 know, because I was young --</p> <p>24 Q. Sure.</p> <p>25 A. -- and going to school. So I</p>



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<p>17</p> <p>1 worked for a law firm. I was -- you know how 2 they go to the Bar and they need books and 3 stuff like that? So I worked at a Bar 4 Association before the lawyers got to be 5 lawyers. And before that I worked in the 6 school -- let me think of it. You know where 7 you go -- it's like a world center for all 8 different people. What do you call that? 9 Q. The United Nations? 10 A. Yeah. I took care of their 11 children. I taught -- I was a beginning 12 teacher, student teacher, and I hated it 13 because they were brats. Yep. I worked 14 there for a while. 15 Then, after that, I worked at the law 16 place that I told you, and then I went to IBM 17 for the summer, and I worked then. Then I 18 wind up working there for more than a year. 19 I met my husband there; big mistake. 20 Q. And after you met your husband and 21 got married, you moved to Harrisburg? 22 A. Yeah. 23 Q. All right. And in Harrisburg you 24 worked at BlueCross? 25 A. BlueCross & BlueShield. Murphy's</p>	<p>19</p> <p>1 worked enough -- I was telling Jennifer I 2 worked long enough to get my fare back to New 3 York for Thanksgiving, and then I stayed 4 there; and I worked -- I went back to 5 Orbachs, and I stayed there. 6 And then I worked for what they call 7 Golden Center of the Performing Arts in 8 Queens, and I liked that. I really liked 9 that. And then they put me in the office to 10 work. First I was not in the office. I was 11 cleaning up. And so they told me, when they 12 had an opening in the office, I could work 13 there, and I worked there. 14 And then from there I went to Florida 15 with my brother. I was there for 16 years 16 and raised my children. I went back to 17 school, and I taught school. I have my own 18 aftercare program. I have my own dance 19 troop, and I taught ballet -- not ballet -- 20 Mardi dance, African dance, jazz, and that 21 was it. 22 Q. Did you go back to college? 23 A. Uh-huh. 24 Q. And you got your degree in 25 education?</p>
<p>18</p> <p>1 Mart before that, and that's it. 2 Q. All right. And when you moved to 3 -- back to New York with your mom, did you 4 have different jobs there? 5 A. I worked for Orbachs, they are not 6 in business anymore, in New York on 34th 7 Street. 8 Q. What was that? 9 A. I was in sales. 10 Q. Was it a store? 11 A. Uh-huh. I hated it. 12 Q. You hated it? 13 A. Uh-huh. 14 Q. Was it like a clothes store? 15 A. Uh-huh. 16 Q. And then you moved to Florida with 17 your brother? 18 A. I worked at Orbachs for a long 19 time, four years, and then I took a vacation. 20 I went to Florida. I went with my brother to 21 try to open up the ice cream store. I got 22 everything all up in midst and did all that. 23 And then I came -- and then used to 24 leave on the weekend and leave me and my son 25 there by myself, and I got real upset. So I</p>	<p>20</p> <p>1 A. I never did, but I am going back. 2 Q. Now you are? 3 A. Uh-huh. 4 Q. You have to say "yes" or "no," 5 remember? 6 A. Yes -- 7 Q. Okay. 8 A. -- ma'am. 9 Q. And are you in school now? 10 A. No, I'm not. 11 Q. When are you going to go to 12 school? 13 A. I have no idea because I've been 14 very, very sick, but I am doing whole lots 15 better. I'm walking real good now, and my 16 diabetes is a little bit more stable. I had 17 high, high, high blood sugars. 18 Q. Is that what you were sick with, 19 diabetes? 20 A. That was one of the things, but I 21 had a catheter. I had a catheter to go to 22 the bathroom. 23 Q. Uh-huh. 24 A. I don't have that now. 25 Q. That's good. That's good.</p>



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21	23
<p>1 A. I'm free.</p> <p>2 Q. --Was that related to your diabetes?</p> <p>3 A. Yes. I had it like a year and a</p> <p>4 half. That's a long time to have a catheter.</p> <p>5 Q. Oh, certainly.</p> <p>6 A. So --</p> <p>7 Q. And when did you get it removed?</p> <p>8 A. For my Christmas present, around</p> <p>9 January.</p> <p>10 Q. Of this past year?</p> <p>11 A. Uh-huh.</p> <p>12 Q. I mean of this year, January of</p> <p>13 this year?</p> <p>14 A. First part of January I went home</p> <p>15 without a catheter. Been catheter free.</p> <p>16 Q. Now, tell me, why are you on SSI?</p> <p>17 A. I really don't like to talk about</p> <p>18 it because it was devastating to me because</p> <p>19 I'm very energetic, high energy, and I got</p> <p>20 electrocuted. I didn't do nothing wrong, but</p> <p>21 I got electrocuted.</p> <p>22 Q. How did it happen?</p> <p>23 A. That's a joke. I'm a busybody and</p> <p>24 try to do everything for myself. So the</p> <p>25 circuit breaker box, I went there, and the</p>	<p>1 Q. No?</p> <p>2 A. No, because I had a good nurse and</p> <p>3 a good doctor, and they called me their</p> <p>4 miracle patient.</p> <p>5 Q. And after that, you started</p> <p>6 drawing SSI?</p> <p>7 A. No. It was a long -- they denied</p> <p>8 me three times. And I was telling Jennifer,</p> <p>9 my close, close friend was a lawyer, and I</p> <p>10 knew her from the school board; and she</p> <p>11 didn't do cases like that, but she helped me</p> <p>12 by going there and talking to the judge. And</p> <p>13 guess what my judge's name was?</p> <p>14 Q. What?</p> <p>15 A. Solomon.</p> <p>16 Q. Did he turn out to be a Solomon?</p> <p>17 A. Oh, he was very wise. He said,</p> <p>18 "Enough pain and enough suffering." So I got</p> <p>19 my SSI.</p> <p>20 Q. And how long have you been drawing</p> <p>21 that?</p> <p>22 A. I was 50, and I'll be 60. So that</p> <p>23 makes ten years.</p> <p>24 Q. Other than your children, do you</p> <p>25 have any other family in Georgia?</p>
22	24
<p>1 electrical was off. And I couldn't cook, and</p> <p>2 I couldn't do -- the water was cold. So I</p> <p>3 went to the circuit breaker box to turn it</p> <p>4 on, and when -- I thought I had turned it on,</p> <p>5 and it still wasn't on in the kitchen. So I</p> <p>6 came back to the circuit breaker box, and I</p> <p>7 saw a key in the circuit breaker box. So my</p> <p>8 mind told me to get it out.</p> <p>9 Q. Oh, yeah.</p> <p>10 A. And I did. And I grabbed on to</p> <p>11 it, and I lit up like a Christmas tree. And</p> <p>12 so I had to go to the burn unit. But the</p> <p>13 miracle is happening. I have no burns on me.</p> <p>14 My face is not burned. And the only thing</p> <p>15 that it damaged is like the long-term memory,</p> <p>16 and when I talk, it takes me a while to say</p> <p>17 what I want to say. So I had to quit</p> <p>18 teaching. I was very upset because I missed</p> <p>19 my children, teaching so much.</p> <p>20 Q. So this happened to you in</p> <p>21 Florida?</p> <p>22 A. Yeah.</p> <p>23 Q. Were you in the burn unit for a</p> <p>24 long time?</p> <p>25 A. Uh-uh.</p>	<p>1 A. Nope.</p> <p>2 Q. When did you first register to</p> <p>3 vote?</p> <p>4 A. No. I said no.</p> <p>5 Q. That's fine.</p> <p>6 A. No.</p> <p>7 Q. I know what you meant. When did</p> <p>8 you first register to vote at all?</p> <p>9 A. Anywhere?</p> <p>10 Q. Not just in Georgia. Right.</p> <p>11 Anywhere.</p> <p>12 A. When I was 21 in New York. Oh, my</p> <p>13 brain. I didn't know I was going to go</p> <p>14 through this today.</p> <p>15 Q. That's all right. You are doing</p> <p>16 fine.</p> <p>17 Now, when did you register to vote in</p> <p>18 Georgia?</p> <p>19 A. 2003 or 4 in Decatur, in Dekalb</p> <p>20 County.</p> <p>21 Q. Were you living in Dekalb at that</p> <p>22 time?</p> <p>23 A. Yes.</p> <p>24 Q. Where were you living?</p> <p>25 A. It had to be by the church. In</p>

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<p>25</p> <p>1 Decatur.</p> <p>2 Q. Like in downtown Decatur?</p> <p>3 A. No. On Wesley Chapel.</p> <p>4 Q. Okay. And did you live by</p> <p>5 yourself?</p> <p>6 A. No. I stayed with my daughter.</p> <p>7 Q. How long have you been where you</p> <p>8 live now?</p> <p>9 A. Two years. Two years this month.</p> <p>10 Q. Did you ever have a driver's</p> <p>11 license in Georgia?</p> <p>12 A. No. Never ever nowhere.</p> <p>13 Q. Nowhere?</p> <p>14 A. Uh-uh. I can't see good enough to</p> <p>15 drive.</p> <p>16 Q. Has that been a problem you've had</p> <p>17 for a long time?</p> <p>18 A. Uh-huh.</p> <p>19 Q. Yes?</p> <p>20 A. Yeah. Yes.</p> <p>21 Q. Do you have any kind of</p> <p>22 identification card that has your picture on</p> <p>23 it?</p> <p>24 A. Yes.</p> <p>25 Q. What do you have?</p>	<p>27</p> <p>1 you are disabled, because I'm too young to be</p> <p>2 there, but I'm on disability; and then my</p> <p>3 doctor helped me get out of my daughter's</p> <p>4 house.</p> <p>5 Q. And is that -- is that a place</p> <p>6 that's run by Fulton County or the Federal</p> <p>7 Government, or do you know?</p> <p>8 A. It's not Section 8. What is the</p> <p>9 other one?</p> <p>10 Q. I don't know.</p> <p>11 A. HUD. HUD. And Russell --</p> <p>12 Mr. Russell runs it -- owns it.</p> <p>13 Q. Do you have any kind of</p> <p>14 identification card for living there? Do</p> <p>15 they give you anything that everybody that</p> <p>16 lives there gets so they can identify people</p> <p>17 who are there?</p> <p>18 A. No. Other high-rises do it, but</p> <p>19 they haven't done it yet. Only thing we got</p> <p>20 is this. When you come in, you have to use</p> <p>21 this (indicating).</p> <p>22 Q. Let me see that.</p> <p>23 A. See, and I think it have --</p> <p>24 Q. It's a key card.</p> <p>25 MS. JORDAN: Yeah.</p>
<p>26</p> <p>1 A. I have my Half Fare card -- both</p> <p>2 of them, the Paratransit and the Half Fare</p> <p>3 card. I have my student ID from FIU.</p> <p>4 Q. And that's Florida International</p> <p>5 University?</p> <p>6 A. FIU, Florida International</p> <p>7 University. They were just getting off the</p> <p>8 ground when I went. Now it's so beautiful</p> <p>9 and so big. You get lost there.</p> <p>10 Q. Are the Paratransit cards and the</p> <p>11 Half Fare cards, are those two different</p> <p>12 cards?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And they both have your</p> <p>15 picture on it?</p> <p>16 A. Yes.</p> <p>17 Q. I'm sorry. I'm drawing a blank on</p> <p>18 what the name is of the apartments where you</p> <p>19 live.</p> <p>20 A. Maggie Russell Towers.</p> <p>21 Q. And is that an assisted living</p> <p>22 place?</p> <p>23 A. No. No. No.</p> <p>24 Q. Is it senior --</p> <p>25 A. A senior citizen high-rise and if</p>	<p>28</p> <p>1 THE WITNESS: Yeah. You push it in</p> <p>2 there like that, and it lets you in. And</p> <p>3 when visitors come, they have to look up your</p> <p>4 telephone number and call you.</p> <p>5 Q. (By Ms. Lewis) Have you ever</p> <p>6 tried to get a state ID from the -- oh, thank</p> <p>7 you.</p> <p>8 A. I look better there.</p> <p>9 Q. You look fine. You look great.</p> <p>10 I'm probably -- I might get a copy of that --</p> <p>11 A. Okay.</p> <p>12 Q. -- before we leave.</p> <p>13 MS. JORDAN: Let me see it.</p> <p>14 Q. (By Ms. Lewis) Have you ever</p> <p>15 tried to get an ID from the Department of</p> <p>16 Drivers Services here in Georgia?</p> <p>17 A. Three times, and they denied me.</p> <p>18 Q. And why is that?</p> <p>19 A. They said first I got to get --</p> <p>20 because my birth certificate say Hawker, and</p> <p>21 then they want me to get -- did I say</p> <p>22 marriage license? I have to write and get my</p> <p>23 marriage license or either my divorce papers,</p> <p>24 and they gave me a hard time.</p> <p>25 Q. And where did you try to get it?</p>



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1 What office did you go to; do you know?
 2 A. South Dekalb Mall.
 3 Q. And when is the last time you
 4 tried to get an ID there?
 5 A. Last year.
 6 Q. And why did you go try to get one
 7 there?
 8 A. Because I need one to vote, and I
 9 need one in order to be at Maggie Russell's.
 10 Q. Maggie Russell requires you to
 11 have a state issued ID?
 12 A. Yeah.
 13 Q. So how are they letting you stay
 14 there now without one?
 15 A. Because I told them I was trying
 16 to get one. Do you know Ms. Johnson, Lois
 17 Johnson?
 18 Q. I don't think so.
 19 A. Well, she's a social worker there,
 20 and she referred me to Senator Ford and
 21 ex-Governor Barnes.
 22 Q. Okay.
 23 A. That's what they told me that she
 24 did.
 25 Q. I'm sorry. That's what what?

30

1 A. That's what -- when they contacted
 2 me with this issue, asked me would I like to
 3 work with y'all, he said that Ms. Johnson
 4 told him about me.
 5 Q. Who told you that? Senator Ford
 6 or Governor Barnes?
 7 A. Senator Ford.
 8 Q. Okay.
 9 A. I have not talked to Barnes yet.
 10 Q. Okay. When did Senator Ford call
 11 you about this?
 12 A. About at least three weeks ago.
 13 Q. When he called you, what did he
 14 say to you?
 15 A. He talked about the issue that I
 16 didn't -- "I heard that you didn't have an ID
 17 card, and would you -- you know, you need to
 18 get one. We can come and talk to you about
 19 this issue." That's what they told me.
 20 Q. And did Senator Ford talk to you
 21 about being involved in a lawsuit?
 22 A. Yes.
 23 Q. Did he ask you if you wanted to be
 24 involved in it?
 25 A. Yes.

31

1 Q. And what did you say?
 2 A. Yes.
 3 Q. Did he tell you anything about the
 4 lawsuit, what the claims are or anything like
 5 that?
 6 A. No. He said he would come and
 7 discuss it with me.
 8 Q. And did he ever come?
 9 A. No. Jennifer contacted me, but
 10 then again --
 11 MS. JORDAN: I just want to caution
 12 Ms. Lake that whatever we spoke about is
 13 privileged. Okay?
 14 THE WITNESS: Okay.
 15 MS. JORDAN: So you can talk about
 16 whatever Senator Ford said to you or on the
 17 phone or in person or whatever, but once it's
 18 between you and I, it's privileged.
 19 THE WITNESS: Okay. Did I cross the
 20 line?
 21 MS. JORDAN: No. You're good. I just
 22 wanted to --
 23 THE WITNESS: Caution me?
 24 MS. JORDAN: I just wanted to caution
 25 you.

32

1 Q. (By Ms. Lewis) So Senator Ford
 2 called you and said he was going to come see
 3 you?
 4 A. Yes.
 5 Q. But he didn't?
 6 A. No. I was not home.
 7 Q. Oh, he came but you weren't home?
 8 A. I don't know if he did or didn't.
 9 I wasn't home.
 10 Q. But the next person you heard from
 11 was Ms. Jordan; is that right?
 12 A. Yes.
 13 Q. Have you ever heard from Senator
 14 Ford again about it?
 15 A. No.
 16 Q. Now, are you registered to vote in
 17 Fulton or Dekalb County?
 18 A. Dekalb.
 19 Q. Okay. And so you still vote in
 20 Dekalb County?
 21 A. I never have.
 22 Q. You never have voted in Dekalb
 23 County?
 24 A. No.
 25 Q. So I think you told me you



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1 registered to vote in Dekalb in -- I don't
 2 know -- three or four years ago; is that
 3 right?
 4 A. Yes.
 5 Q. But you haven't ever voted there?
 6 A. No.
 7 Q. And why haven't you ever voted?
 8 A. I have been so sick, as I told
 9 you. I haven't been able to do much.
 10 Q. Have you ever requested an
 11 absentee ballot from Dekalb County?
 12 A. Yes, when I was in Fulton County.
 13 Q. Okay. You lived in Fulton before
 14 Dekalb?
 15 A. (Witness shakes head.)
 16 Q. No. When you lived in Fulton
 17 County, you requested an absentee ballot from
 18 Dekalb County; is that right?
 19 A. Yes.
 20 Q. And when was that?
 21 A. Two years ago.
 22 Q. Have you only requested an
 23 absentee ballot one time?
 24 A. Yes, because most of the time I've
 25 been in and out of the hospital sick. And my

34

1 eyesight is -- TMI?
 2 MS. JORDAN: Can I make a clarification
 3 for the record?
 4 MS. LEWIS: Sure.
 5 MS. JORDAN: Ms. Lake has changed her
 6 address recently with the Secretary of
 7 State's Office to reflect that she does live
 8 at Maggie Russell Towers. So our amended
 9 complaint, which is being filed today with
 10 our briefing, indicates that she is a
 11 resident of Fulton and properly registered in
 12 Fulton, and we are also adding the Fulton
 13 County election officials. So I wanted to
 14 clarify that.
 15 MR. PRITCHETT: I'm sure they will be
 16 happy.
 17 MS. JORDAN: Very excited. So just to
 18 kind of clarify that she was registered in
 19 Dekalb.
 20 MS. LEWIS: Okay. Let's go off the
 21 record just for a minute.
 22 (Discussion ensued off the record.)
 23 MS. JORDAN: I just wanted to clarify
 24 that I understood your confusion, because you
 25 are like if you live at Maggie Russell --

35

1 MS. LEWIS: Right.
 2 MS. JORDAN: Yeah.
 3 MS. LEWIS: Okay.
 4 Q. (By Ms. Lewis) I think you were
 5 telling us about your eye condition. Do you
 6 have a condition that's getting worse?
 7 A. You know what it's like on a need
 8 to know basis? Too much TMI means too much
 9 information. So they don't need to know
 10 that? That's TMI? Now you know what TMI
 11 means?
 12 Q. No. I thought you were talking
 13 about your eye condition.
 14 A. No. TMI means too much
 15 information. I don't really have to tell
 16 that. That's not really anybody's business.
 17 My eye, what I have, I can't do --
 18 MS. JORDAN: She obviously prefers not
 19 to talk about it. I don't think it's -- it's
 20 not an issue with the lawsuit, but if you --
 21 I mean --
 22 MS. LEWIS: Well, it is to some extent
 23 because the law now allows you to vote an
 24 absentee ballot for no reason.
 25 Q. (By Ms. Lewis) So I think you

36

1 were telling me about why you haven't voted
 2 an absentee ballot.
 3 A. Yeah. Mostly I've been in and out
 4 of the hospital, and my eyesight is poor,
 5 very poor; and like a month ago I could not
 6 see at all, anything. So at least I can see
 7 you now --
 8 Q. All right.
 9 A. -- minimal.
 10 Q. Can you read stuff now?
 11 A. Not -- not really. Not too much.
 12 I have to have -- bills, I have big, big
 13 checks like this (indicating).
 14 Q. I'm sorry?
 15 A. I have big checks like this
 16 (indicating).
 17 Q. Big checks?
 18 A. Yeah; to write out checks.
 19 Q. Right.
 20 A. And the register, it's like this
 21 (indicating).
 22 Q. Right. But you can read your
 23 bills so that you can write a check for them,
 24 right?
 25 A. No. I have somebody help me.



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1 Q. Okay.

2 A. Sometimes I can, and sometimes I

3 can't. Sometimes my sight is very good, and

4 sometimes, with this sugar, it's very bad. I

5 can't see anything. Like you are sitting

6 there now. I can see your colors and

7 everything, but I cannot see your features.

8 Q. Okay. And when you can't see,

9 then you have somebody help you read things?

10 A. Yeah. Uh-huh. I have one -- a

11 nurse.

12 Q. Who helps you?

13 A. I have a nurse.

14 Q. Do you have a nurse around the

15 clock?

16 A. No. Uh-uh.

17 Q. Just in the daytime?

18 A. She comes occasionally to check on

19 me, and then I have somebody come and she

20 does my house for me. She cleans up and

21 everything.

22 Q. And those people help you read

23 things you need to read?

24 A. I am a pretty stubborn person. I

25 try to do it myself. Whatever I can do I do

38

1 for myself.

2 Q. But if you can't read it, they

3 will help you read it?

4 A. Yeah.

5 Q. Have you requested an absentee

6 ballot for the upcoming election?

7 A. No.

8 Q. Do you know when the upcoming

9 election is?

10 A. Yes.

11 Q. When is it?

12 A. The primary --

13 Q. Yes.

14 A. -- that's the -- I think it's like

15 the end of the month of July.

16 Q. All right. Do you know -- when

17 did you change your registration to Fulton

18 County, your voter registration?

19 A. Just recently.

20 Q. I mean yesterday or three weeks

21 ago?

22 A. About a week and a half.

23 Q. Okay. And how did you go about

24 doing that?

25 A. I filled out some papers.

39

1 Q. Where did you fill them out?

2 A. At my home.

3 Q. Okay. How did you get them to the

4 Fulton County Board or to the Dekalb County

5 Board?

6 MS. JORDAN: Can I? We pulled papers

7 off the computer for her, and they were sent

8 to the Secretary of State's Office through

9 the mail. She put them in the mail. But

10 Secretary of State's Office, not the Dekalb

11 or Fulton --

12 Q. (By Ms. Lewis) So you changed it

13 with the Secretary of State's Office?

14 A. (Witness nods head.)

15 Q. About a week and a half ago?

16 A. Yes.

17 Q. Have you gotten a card yet that

18 tells you where to vote?

19 A. No. Uh-uh.

20 Q. Do you know where you are going to

21 be voting?

22 A. No. I'm not sure.

23 Q. When you get that card that tells

24 you where to vote, how will you get to the

25 polls?

40

1 A. Usually they have somebody come

2 and get us and take us to the poll.

3 Q. Who is "they?"

4 A. How do you mean "they?"

5 Q. I mean who comes and gets you and

6 takes you to the polls?

7 A. When they voted, they had like

8 transportation from the -- from like, when we

9 were voting for the mayor -- when they were

10 voting for the mayor at Maggie Russell

11 Towers, they had a van come and pick us up.

12 Q. The mayor did?

13 A. Someone from her office.

14 Q. From her office. Okay.

15 So you think on this election somebody

16 will come and pick you up and take you to the

17 polls; is that right?

18 A. Uh-huh.

19 Q. You have to say "yes" or "no."

20 A. I'm choking.

21 Q. All right.

22 A. Yes.

23 Q. Do you want to take a break?

24 A. (Witness shakes head.) Do you?

25 Q. No.



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<p>41</p> <p>1 Okay. Does Maggie Russell provide any 2 transportation to the people who live there? 3 Do they take y'all to the grocery store, or 4 to doctors appointments or anything like 5 that? 6 A. They used to, but the hospital cut 7 it out. Now I get Paratransit from MARTA, 8 and we have a grocery store -- we have -- 9 Kroger have a bus, come take us to the 10 grocery store. 11 Q. Are you okay? 12 A. Uh-huh. 13 Q. Now, with the Paratransit card, a 14 bus will pick you up at Maggie Russell and 15 take you to the MARTA station, and then you 16 can get a bus from the MARTA station to where 17 you're going? Is that how it works? 18 A. (Witness shakes head.) 19 Q. No. How does it work? 20 A. They come pick us up and take us 21 wherever we want to go. MARTA does, 22 Paratransit. 23 Q. You don't get on the train? 24 A. I don't really have to. They take 25 you to most of the places. But they do</p>	<p>43</p> <p>1 Q. Okay. What church do you go to? 2 A. I go to Butler Street because it's 3 closer, but my membership is at New Piney 4 Grove Baptist Church. 5 Q. When you go to Butler Street, how 6 do you get there? 7 A. I can walk right across the street 8 because it's right behind me. 9 Q. Do you ever go to Piney Grove 10 anymore? 11 A. Yes. I call them up, and they 12 come and pick me up and take me. 13 Q. Now, in connection with your SSI, 14 do you ever have to go into a Social Security 15 office? 16 A. When I first got here, yes. 17 Q. Let's say how about in the last 18 year or two? 19 A. No. Uh-uh. 20 Q. And are your checks direct 21 deposited? 22 A. Yes. 23 Q. Do you have a check -- you must 24 have a checking account, because you were 25 talking about your checks?</p>
<p>42</p> <p>1 provide to the train, but I don't like to go 2 on the train because of the elevator and 3 steps. 4 Q. Where does the Paratransit bus 5 take you? What kind of places do you go to? 6 A. Hospital. They can take you to 7 the grocery store. They can take you to an 8 event, any kind of event that you want to go 9 to. 10 Q. And how do you arrange with them 11 to come get you? 12 A. You call a day ahead of time, and 13 they come right there to Maggie Russell. 14 Q. Do they have limits on where 15 they'll take you, like how far? 16 A. Yeah. It's -- yeah. 17 Q. What is the limit? 18 A. I don't really remember. They 19 have a book. 20 Q. Will they take you pretty -- I'm 21 sorry. 22 A. I have a book that tells you. 23 Q. Now, are you a member of any 24 church? 25 A. Yes.</p>	<p>44</p> <p>1 A. Yes. 2 Q. Do you ever have to cash a check 3 anywhere? 4 A. I go to the ATM. So I don't 5 really have to cash it when I -- you know, 6 direct deposit just go to the ATM, and you 7 get your money -- 8 Q. Right. 9 A. -- at the hospital. I go to the 10 hospital. They have -- you know, they have 11 Wachovia there. 12 Q. Do you ever write a check to any 13 store or anything like that, where you have 14 to show an ID? 15 A. Not really. I just pay my bills, 16 and I don't have to have an ID for that. I 17 just send a telephone bill like that and 18 rent. That's it. 19 Q. When you go to medical 20 appointments, do you ever have to show a 21 picture ID? 22 A. Sometimes, if they don't know you, 23 they make a copy of it. 24 Q. So what do you give them? 25 A. What I gave you.</p>



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<p>45</p> <p>1 Q. Your Paratransit card?</p> <p>2 A. Yes.</p> <p>3 Q. Now, in addition to riding the</p> <p>4 MARTA Paratransit and getting rides from</p> <p>5 church sometimes, do you have any other</p> <p>6 friends that drive that take you places?</p> <p>7 A. Just my daughter. She would take</p> <p>8 me. Sometimes, at Maggie Russell, some of</p> <p>9 them can drive, and I go with them.</p> <p>10 Q. You haven't worked since you had</p> <p>11 your electrical shock; is that right?</p> <p>12 A. I tried to go back to work twice,</p> <p>13 and then my supervisor came; and he talked to</p> <p>14 me for a long time. So yes, I did go back to</p> <p>15 work several times, but I haven't worked -- I</p> <p>16 was not able to work after that.</p> <p>17 Q. And you haven't worked anywhere in</p> <p>18 Georgia, have you?</p> <p>19 A. I haven't been well enough to work</p> <p>20 anywhere.</p> <p>21 Q. Do you do any kind of volunteer</p> <p>22 work?</p> <p>23 A. No. That's why I'm excited about</p> <p>24 this.</p> <p>25 Q. About going back to school or --</p>	<p>47</p> <p>1 A. Yes, I have, a lot. Like I told</p> <p>2 you, I had like a group that I taught</p> <p>3 dancing. That was in Miami; my own dance</p> <p>4 troop. That was a long while ago.</p> <p>5 Q. Okay.</p> <p>6 A. And then I worked in my community</p> <p>7 teaching the children how to knit, etiquette,</p> <p>8 self-determination, learning how to have good</p> <p>9 self-esteem about yourself, teaching them how</p> <p>10 to handle theyself and how to dress and stuff</p> <p>11 like that. Then I taught sign language. I</p> <p>12 taught them sign language; various things</p> <p>13 like that in my community. Oh, I forgot the</p> <p>14 watch group.</p> <p>15 Q. Like --</p> <p>16 A. To watch -- you know, crime watch.</p> <p>17 Q. Like a neighborhood watch?</p> <p>18 A. Yeah. And drug watch.</p> <p>19 Q. Do you know Margaret Berry, who is</p> <p>20 the Plaintiff in this case?</p> <p>21 A. No, I do not.</p> <p>22 Q. I am just going to go through a</p> <p>23 list of things with you. It should not take</p> <p>24 very much time at all.</p> <p>25 Do you have a passport?</p>
<p>46</p> <p>1 A. About going back to school, about</p> <p>2 helping any way I can.</p> <p>3 Q. Where will you go back to school?</p> <p>4 A. I have no idea. That's something</p> <p>5 I'm waiting on to see how it's going to work</p> <p>6 out.</p> <p>7 Q. How what is going to work out?</p> <p>8 A. My long-term goal is to go back to</p> <p>9 school, and I am going to see how everything</p> <p>10 is going to work out with me. With me, I</p> <p>11 can't commit to anything right now. The best</p> <p>12 thing I'm doing now is learning how to walk</p> <p>13 all over again real good, learning how to get</p> <p>14 around my apartment and get around the</p> <p>15 community, seeing -- seeing everything</p> <p>16 visually, being able to do my own paperwork</p> <p>17 and stuff. Those are my goals. And so</p> <p>18 hopefully I can go back to school.</p> <p>19 Q. Now, have you ever been involved</p> <p>20 in any kind of political groups,</p> <p>21 organizations?</p> <p>22 A. No. Uh-uh.</p> <p>23 Q. How about any kind of community</p> <p>24 organizations? It sounds like you had a lot</p> <p>25 of community work when you lived in Florida?</p>	<p>48</p> <p>1 A. No.</p> <p>2 Q. Have you ever had one?</p> <p>3 A. No.</p> <p>4 Q. You say you have a student ID from</p> <p>5 FIU?</p> <p>6 A. Yes.</p> <p>7 Q. Does it have an expiration date on</p> <p>8 it?</p> <p>9 A. No.</p> <p>10 Q. Do you have it with you today?</p> <p>11 A. No. That's what I was looking</p> <p>12 for.</p> <p>13 Q. Okay.</p> <p>14 A. But I didn't see it in there.</p> <p>15 Q. You are not a member of any Indian</p> <p>16 tribe, are you? That's one of the forms of</p> <p>17 ID that you can use.</p> <p>18 MS. JORDAN: If you are, that's fine.</p> <p>19 Answer truthfully.</p> <p>20 THE WITNESS: They're all dead in my</p> <p>21 family. So I don't know anything about it.</p> <p>22 Q. (By Ms. Lewis) Maybe a better</p> <p>23 question is you don't have an Indian tribal</p> <p>24 ID card, do you?</p> <p>25 A. No, I do not.</p>



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<p>49</p> <p>1 Q. Were you ever in the military? 2 A. No. 3 Q. And you weren't ever a military 4 dependant, were you? 5 A. No. My people -- my dad's not 6 from this country. 7 Q. All right. And your husband was 8 not in the military? 9 A. No. 10 Q. And none of your children? 11 A. My son. 12 Q. Which one? 13 A. The oldest one. 14 Q. Is he still in the military? 15 A. No. 16 Q. Okay. But were you a dependant of 17 his when he was in the military? 18 A. Yes and no. Can it be a yes and a 19 no answer? 20 Q. Sure. You can tell us. You can 21 tell us the answer. 22 A. Because he was married -- he got 23 married, but at first I was dependant; and 24 he's supposed to send me money, but I never 25 really got any.</p>	<p>51</p> <p>1 A. When my mother died, I had to take 2 a plane. 3 Q. What year was that? 4 A. Four years ago. So what would 5 that be? 6 Q. Did you have to show an ID to get 7 on the plane, photo ID? 8 A. At that particular time, yes, but 9 I used the same thing, what I have here. 10 They accepted it. 11 Q. Your MARTA card? 12 A. Yeah. 13 Q. Do you ever go to a government 14 building where you have to show an ID to get 15 in? 16 A. No. Uh-uh. 17 Q. Do you have a copy of your birth 18 certificate now? 19 A. Not with me. 20 Q. I mean do you have one -- 21 A. Yes. 22 Q. -- at your house? 23 A. Yes. 24 Q. And do you have a copy of your 25 marriage license?</p>
<p>50</p> <p>1 Q. But you never got a military 2 dependant card? 3 A. No, ma'am. 4 Q. Do you intend to vote in the next 5 election? 6 A. I sure do. 7 Q. All right. 8 A. Yes. 9 Q. Okay. And do you know you can get 10 an absentee ballot for no reason? You can 11 just request one. Did you know that? 12 A. Yes. But I want to vote, and I 13 want -- yes, but I want to vote. 14 Q. All right. And you know you can 15 vote an absentee ballot without having any 16 kind of ID; is that right? 17 A. Yes, but I want an ID. 18 Q. All right. Have you ever flown 19 anywhere? 20 A. Yes. 21 Q. Okay. Recently have you flown 22 somewhere? 23 A. Uh-uh. No. No. No. 24 Q. When is the last time you flew, do 25 you think?</p>	<p>52</p> <p>1 A. No. 2 Q. Have you written off for a copy of 3 that? 4 A. Yes, and they got -- it got mixed 5 up. They kept sending me something back, and 6 they sent back the check; and I just got 7 tired, and I didn't. 8 Q. Do you have to file tax returns -- 9 A. No. 10 Q. -- being on SSI? 11 A. No, because I don't work. 12 Q. Do you receive a statement from 13 the Social Security Administration at least 14 every year? 15 A. Yes. 16 Q. How long ago did you go to FIU? 17 A. Ten, 11 years ago. 18 Q. Do you have any of your 19 transcripts or anything from FIU? 20 A. No. 21 Q. And you receive bank statements 22 from the bank you use? 23 A. Yes. 24 Q. They send you statements? 25 A. Yes.</p>



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1 Q. At Maggie Russell, do you have to
2 sign a lease?
3 A. Yes.
4 Q. Every year?
5 A. Yes.
6 Q. And how do you pay your rent? Do
7 you pay it by check?
8 A. No.
9 Q. Do they take it directly from SSI?
10 A. No. I have to get a money order.
11 Q. Do you get Medicaid or --
12 A. I get both Medicaid and Medicare.
13 Q. Medicare, too. And you get
14 statements from them as well?
15 A. Yes.
16 Q. You don't own a car, do you?
17 A. No. I can't drive.
18 Q. Yeah, I know. I didn't know if
19 you might, you know, have a title to a car
20 that somebody else uses or -- no, you don't?
21 A. I can't drive.
22 Q. Okay.
23 A. No use for a car.
24 Q. At Maggie Russell, does anybody
25 ever come there to talk about voting and

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1 voting absentee ballot at any time?
2 A. Yes.
3 Q. And do people come there and show
4 you how it's done?
5 A. No.
6 Q. Okay. What do they come and talk
7 about?
8 A. "Vote for me."
9 Q. Right. And they tell you how to
10 get an absentee ballot and vote for me?
11 A. No. No. Remember, I'm the one
12 that's mostly gone and not there, in the
13 hospital.
14 Q. Okay.
15 A. So I miss out on so much. I'm
16 doing whole lots better.
17 Q. That's good.
18 MS. LEWIS: I don't have any other
19 questions. How about you?
20 MR. PRITCHETT: Just a couple. Could I
21 see those IDs?
22 MS. JORDAN: Yes, you can. If y'all
23 want to make copies of these, that's fine.
24 MS. LEWIS: Sure.
25 EXAMINATION

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1 BY-MR.PRITCHETT:
2 Q. Ms. Lake, when did you move to
3 Georgia? I am not sure I got that.
4 A. Four years ago.
5 Q. Okay. And did you try to get a
6 Georgia ID right after you moved here?
7 A. Yes.
8 Q. Okay. And you just -- you weren't
9 able to?
10 A. No.
11 Q. And tell me again why were you not
12 able to get a Georgia ID?
13 A. Because they gave me so many
14 things that I had to do. Like I had to get a
15 marriage license. I had to prove -- I had to
16 get a marriage license. Then I had to write
17 to Florida and prove that I had a state ID in
18 Florida because it was expired, and then they
19 wanted a divorce -- you know, a transcript
20 from my divorce. So all this money and all
21 this going here and there, I wasn't able to
22 get any.
23 Q. Who told you that you had to
24 provide all those documents?
25 A. When I went to South Dekalb Mall

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1 where they have what they call a DMV. I
2 think it's called a DMV.
3 Q. Okay.
4 A. That's where I went, South Dekalb
5 Mall.
6 Q. Did you try to get any of those
7 documents, or did you just -- I'm sorry. Did
8 you try to get any of those documents?
9 A. Yes.
10 Q. Were you able to get any of them?
11 A. No.
12 Q. Okay. And did you eventually just
13 give up on your efforts to get a Georgia ID?
14 A. Yes.
15 Q. When did you give up on your
16 efforts, if you can remember?
17 A. A couple of months ago because a
18 friend and I, we both needed ID at the
19 high-rise. So we had set a date when we was
20 going to go to this DMV that's closer to us,
21 because the one downtown had moved, she said.
22 So we had set a date to go then, and then I
23 had to go in the hospital. So I never did
24 go.
25 Q. Have you lived in any states other



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<p style="text-align: center;">57</p> <p>1 than New York, Pennsylvania, Florida and 2 Georgia? 3 A. No. 4 Q. You said you were registered to 5 vote when you lived in New York, I believe, 6 right? 7 A. Yes, when I was 21, and I 8 registered to vote and I voted in Miami. 9 Q. We'll get -- let me get to them 10 one by one. I know you know what I'm going 11 to ask. When were you first registered to 12 vote in New York? I think you said when you 13 were 21 or something -- 14 A. Yes. 15 Q. -- is that right? 16 And did you, in fact, vote in some 17 elections when you were living in New York? 18 A. Yes. 19 Q. And did you have to -- when you 20 went to vote -- or did you always go vote in 21 person when you were in New York? 22 A. Yes. 23 Q. Okay. You never got an absentee 24 ballot? 25 A. No. I had no need.</p>	<p style="text-align: center;">59</p> <p>1 Q. And did you have to show any ID 2 when you went to vote there? 3 A. No. 4 Q. Okay. You remember that you 5 didn't have to show any ID? 6 A. Right. 7 Q. But you have not voted since you 8 moved to Georgia, correct? 9 A. No, but I was reg- -- but I was 10 registered. 11 Q. And are you saying that the reason 12 you haven't -- well, just tell me again just 13 so we're clear. Why haven't you voted since 14 you moved to Georgia? 15 A. Because I don't have a state ID. 16 Q. Okay. Is it your understanding 17 that you have always had to have an ID to be 18 able to vote in Georgia? 19 A. Yes. 20 Q. Okay. Who issues these -- does 21 MARTA issue these IDs that I'm looking at? 22 A. Yes. 23 Q. And how did you go about getting 24 these two IDs? 25 A. I had to fill out all these forms,</p>
<p style="text-align: center;">58</p> <p>1 Q. Did you have to show any kind of 2 ID or anything when you went to vote in New 3 York ever? 4 A. I don't remember. 5 Q. Okay. 6 A. I don't know. 7 Q. Okay. Fair enough. 8 A. I don't know. 9 Q. What about when you were in 10 Pennsylvania -- when you lived in 11 Pennsylvania, were you registered to vote 12 there also? 13 A. Yes. 14 Q. Did you vote in some elections -- 15 A. Yes. 16 Q. -- when you were there? Okay. 17 Did you have to show ID in Pennsylvania 18 when you went to vote? 19 A. I don't know. 20 Q. And then, in Florida, were you 21 also registered to vote there? 22 A. Oh, yes. 23 Q. And did you vote in elections when 24 you were in Florida? 25 A. Yes.</p>	<p style="text-align: center;">60</p> <p>1 and my doctor has to fill out the other part; 2 and then they issue the ID. They send you 3 back, if you are qualified. 4 Q. All right. It looks -- like your 5 Paratransit ID, looks like you've had that 6 since March the 22nd of this year. Does that 7 sound right? 8 A. Yes. 9 Q. And did you have a Paratransit ID 10 before March the 22nd of this year? 11 A. Yes. 12 Q. Okay. Is this just -- is this a 13 renewal of one that you already had? 14 A. Yes. 15 Q. Okay. I'm sorry. I didn't 16 understand that. 17 When is the first time that you had a 18 MARTA Paratransit ID, if you can remember? 19 A. 2003. 2002 and 2003. 20 Q. And do you have to get it renewed 21 every two years, it looks like? 22 A. Yes. 23 Q. So it says this one expires on 24 March 22nd of 2008. 25 A. It's not nine?</p>



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1 Q. It says 2008.
 2 A. Okay.
 3 Q. So it looks like they last for two
 4 years. Is that what --
 5 A. Yes.
 6 Q. -- your understanding is?
 7 A. Yes.
 8 Q. So you would have gotten one, I
 9 guess, in 2004 also --
 10 A. Yes.
 11 Q. -- since this is 2006? All right.
 12 MR. PRITCHETT: That's all the
 13 questions I have. Do you want copies of
 14 these?
 15 MS. LEWIS: Yeah, I will make copies.
 16 I want to ask you just a couple more
 17 questions, Ms. Lake.
 18 FURTHER EXAMINATION
 19 BY-MS.LEWIS:
 20 Q. Since you moved to Georgia, how
 21 many times have you been in the hospital?
 22 A. About six times.
 23 Q. And the last time you were in the
 24 hospital, was that this year?
 25 A. Yes. And I was in like the first

62

1 part of May. I was in there for two days.
 2 Q. What's the longest you ever stayed
 3 in the hospital since you've been in Georgia?
 4 A. In December, the first part of
 5 December to January; just three days before
 6 January.
 7 Q. And that's when you had the
 8 catheter?
 9 A. Yeah. I stayed in there a month.
 10 Q. Did they send you home with the
 11 catheter?
 12 A. No. I don't have it anymore.
 13 Q. Other than that month's stay, were
 14 the other times you were in the hospital for
 15 a few days at a time?
 16 A. Well, maybe a week. No more than
 17 a week. You know, three or four days. That
 18 was the longest I ever stayed. I was really
 19 sick.
 20 Q. In December?
 21 A. (Witness nods head.)
 22 MS. JORDAN: Yes or no?
 23 THE WITNESS: Yes.
 24 MS. JORDAN: Thank you.
 25 Q. (By Ms. Lewis) Now, I think I got

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1 a little bit confused about your trips to the
 2 DMV to get your license. When is the first
 3 time you tried to -- not your license. Your
 4 ID.
 5 When is the first time you went there
 6 trying to get one?
 7 A. When I first moved to Georgia.
 8 Q. And what year was that?
 9 A. Let's see. I think last year I
 10 went there more than one time. That's why.
 11 Q. No. But I'm asking you about when
 12 is the first time you went there?
 13 A. Last year.
 14 Q. Last year?
 15 A. Uh-huh.
 16 Q. Not when you first moved to
 17 Georgia?
 18 A. No.
 19 Q. Last year is the first time you
 20 went there?
 21 A. Yeah. I got messed up with
 22 Florida.
 23 Q. That's okay. So you went there
 24 twice in 2005?
 25 A. Yes.

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1 Q. All right. And did you --
 2 A. Actually, three times, but the
 3 first time she turned me away. The lady at
 4 the DMV, she turned me away. And so then I
 5 came back, and I presented her the
 6 identification that she asked for; and then
 7 she told me I had to have something else. So
 8 it's about three times.
 9 Q. Okay. The first time you went
 10 there, why did they turn you away?
 11 A. She said I didn't have -- I didn't
 12 have proper identification.
 13 Q. Did she tell you what you needed?
 14 A. She was very nasty. She didn't --
 15 she didn't.
 16 Q. She didn't tell you what it was?
 17 A. Uh-uh. And I had waited so long
 18 in that line, and she didn't tell me; and so
 19 I was so disgusted.
 20 Q. So how did you know what to go
 21 back with?
 22 A. Okay. I came back with -- like,
 23 remember, I said I went there three times?
 24 First time, she just turned me away
 25 completely, without, you know, without



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1 anything. And so the next time I went, I
 2 talked to somebody, and they told me what I
 3 needed and everything. And so I started
 4 sending away for the marriage license, and
 5 then I sent -- and I tried to call Florida so
 6 I could prove I had a state ID.
 7 Q. How did you have a state ID from
 8 Florida?
 9 A. I had lived in Florida, and I had
 10 to have a state ID; and I got one.
 11 Q. Do you still have it?
 12 A. Yeah, I have it. It's expired,
 13 but I have it. That was the whole part of
 14 the problem, that the ID was expired.
 15 Q. Okay. And so the second time you
 16 went, they told you what you need to bring
 17 back, right?
 18 A. Yes.
 19 Q. Okay. What was that? Marriage
 20 license?
 21 A. Yes.
 22 Q. And what else?
 23 A. The state ID --
 24 Q. All right.
 25 A. -- for Florida.

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1 Q. All right. So you sent off for
 2 your marriage license?
 3 A. Yes.
 4 Q. And did you get it?
 5 A. No.
 6 Q. That was the problem you had with
 7 them --
 8 A. Yes.
 9 Q. -- when they sent your check back?
 10 What state was that? New York?
 11 A. No. Wilmington, Delaware.
 12 Q. Delaware? And have you followed
 13 up with them to see how you can get your
 14 marriage license?
 15 A. No, not really.
 16 Q. Okay. And did you get your --
 17 what you needed from Florida?
 18 A. No.
 19 Q. Have you followed up with them?
 20 A. Yes.
 21 Q. Okay. And what's the problem?
 22 A. Every time I call -- I've been
 23 calling, they're busy, and then I have my
 24 friend to go by; and she said that she had a
 25 problem with them, too.

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1 Q. So did you ever go back to the
 2 DMV, the Georgia DMV or --
 3 A. No because I have to have somebody
 4 take me, and I didn't have anybody to take
 5 me, because I don't know my way around
 6 Georgia and different places I don't know.
 7 Q. Is there any reason you can't take
 8 the Paratransit to get there?
 9 A. Yes -- no, there is not, but I
 10 have to know where I have -- I need to know
 11 where I should go, and if I don't know that,
 12 I cannot go.
 13 Q. Well, but you got there twice
 14 before?
 15 A. Yes, but that was in South Dekalb
 16 Mall.
 17 Q. You just need to know the location
 18 of another?
 19 A. Closer one that I don't have to go
 20 that far.
 21 Q. I see. I see.
 22 A. Because that's a long way.
 23 There's so many people waiting in line. I am
 24 not able to do that.
 25 Q. Do you know they have a special

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1 line at the Drivers Services for people with
 2 disabilities?
 3 A. They did not use it -- there was
 4 several of us there at South Dekalb Mall, and
 5 they did not extend us that, because I asked.
 6 I was about to fall out, and they did not do
 7 it. I'm sorry.
 8 Q. You asked, and they said --
 9 A. I went up and asked because I was
 10 about to fall out. I needed to eat because I
 11 am a diabetic, and I started to get very
 12 sick.
 13 Q. And they told you you couldn't get
 14 in the --
 15 A. They told me you have to wait in
 16 line with everybody else.
 17 Q. And you told them you had a
 18 disability?
 19 A. Yes, I did.
 20 MS. LEWIS: I don't have any other
 21 questions. And I will be glad to make a copy
 22 of these, which are her MARTA card,
 23 Paratransit, which we can mark as A, and then
 24 the Half Fair, which we can mark as B.
 25 (Defendants' Exhibit-A and Exhibit-B)



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<p>69</p> <p>1 were marked for identification.) 2 (Whereupon, the deposition was 3 concluded at 3:16 p.m.) 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>71</p> <p>1 STATE OF GEORGIA: 2 COUNTY OF FULTON: 3 I hereby certify that the foregoing 4 transcript was reported, as stated in the 5 caption, and the questions and answers 6 thereto were reduced to typewriting under my 7 direction; that the foregoing pages represent 8 a true, complete, and correct transcript of 9 the evidence given upon said hearing, and I 10 further certify that I am not of kin or 11 counsel to the parties in the case; am not 12 in the employ of counsel for any of said 13 parties; nor am I in any way interested in 14 the result of said case. 15 16 17 18 19 20 21 22 23 24 25</p>
<p>70</p> <p>1 DESCRIPTION OF EXHIBITS 2 3 EXHIBIT IDENTIFICATION 4 A MARTA Paratransit Service card 5 B Half Fare Photo ID card 6 (Original exhibits attached to the 7 Original transcript.) 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>72</p> <p>1 Disclosure Pursuant to Article 2 8(B) of the Rules and Regulations of the 3 Board of Court Reporting of the Judicial 4 Council of Georgia, I make the following 5 disclosure: 6 I am a Georgia Certified Court 7 Reporter, here as a representative of 8 Alexander Gallo & Associates, Inc., to report 9 the foregoing matter. Alexander Gallo & 10 Associates, Inc., is not taking this 11 deposition under any contract that is 12 prohibited by O.C.G.A. 5-14-37 (a) and (b). 13 Alexander Gallo & Associates, 14 Inc., will be charging its usual and 15 customary rates for this transcript. 16 17 18 19 20 CANDACE L. PAYNE, CCR-B-2317 21 22 23 24 25</p>



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1 **CAPTION**

2 The Deposition of Rosalind Elaine Lake,

3 taken in the matter, on the date, and at the time and

4 place set out on the title page hereof.

5 It was requested that the deposition be taken

6 by the reporter and that same be reduced to

7 typewritten form.

8 It was agreed by and between counsel and the

9 parties that the Deponent will read and sign the

10 transcript of said deposition.

11

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1 **DEPOSITION ERRATA SHEET**

2 RE: Alexander Gallo & Associates, Inc.

3 File No. 14485

4 Case Caption: MARGARET L. BERRY

5 vs. HON. SONNY PERDUE, et al.

6 Deponent: Rosalind Elaine Lake

7 Deposition Date: June 23, 2006

8 To the Reporter:

9 I have read the entire transcript of my Deposition taken

10 in the captioned matter or the same has been read to me.

11 I request that the following changes be entered upon the

12 record for the reasons indicated. I have signed my name to

13 the Errata Sheet and the appropriate Certificate and

14 authorize you to attach both to the original transcript.

15

16 Page No. _____ Line No. _____ Change to: _____

17 _____

18 Reason for change: _____

19 Page No. _____ Line No. _____ Change to: _____

20 _____

21 Reason for change: _____

22 Page No. _____ Line No. _____ Change to: _____

23 _____

24 Reason for change: _____

25 _____

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1 **CERTIFICATE**

2 STATE OF _____

3 COUNTY/CITY OF _____

4 Before me, this day, personally appeared,

5 Rosalind Elaine Lake, who, being duly sworn, states that the

6 foregoing transcript of his/her Deposition, taken in the

7 matter, on the date, and at the time and place set out

8 on the title page hereof, constitutes a true and accurate

9 transcript of said deposition.

10 _____

11 Rosalind Elaine Lake

12

13 SUBSCRIBED and SWORN to before me this

14 day of _____, 2006 in the

15 jurisdiction aforesaid.

16

17 _____

18 My Commission Expires Notary Public

19

20 *If no changes need to be made on the following two pages,

21 place a check here _____, and return only this signed page.*

22

23

24

25

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1 Deposition of Rosalind Elaine Lake

2 Page No. _____ Line No. _____ Change to: _____

3 _____

4 Reason for change: _____

5 Page No. _____ Line No. _____ Change to: _____

6 _____

7 Reason for change: _____

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15 _____

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17 Page No. _____ Line No. _____ Change to: _____

18 _____

19 Reason for change: _____

20 _____

21 SIGNATURE: _____ DATE: _____

22 Rosalind Elaine Lake

23

24

25



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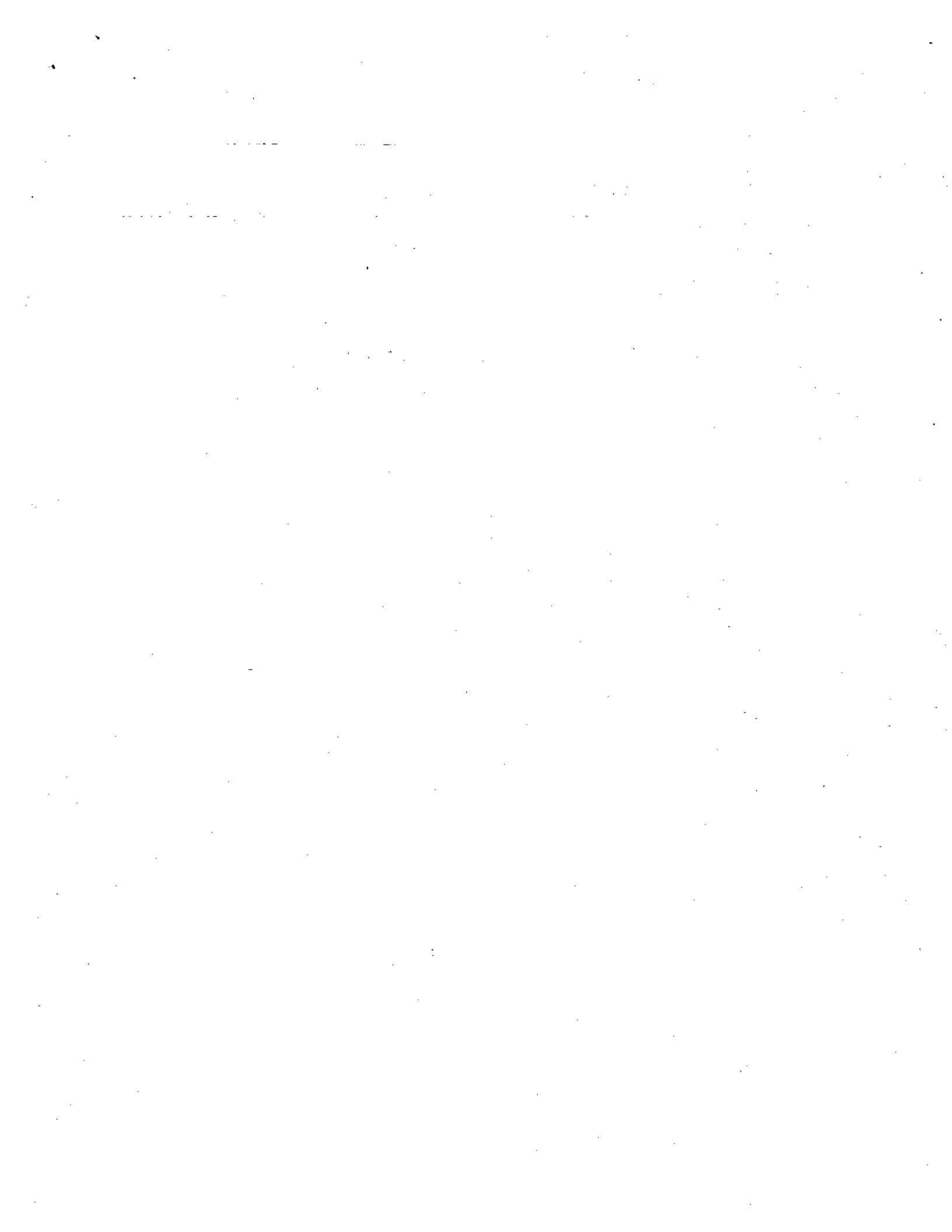
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		Certificate of Eligibility for ADA Paratransit Service	
Name ROSALIND E. LAKE		MARTA	
Address 400 RALPH MCGILL BLVD #6E			
City ATLANTA, GA.		State GA.	
ID.# 23-6336-90		Zip 30312	
Date Issued 03-22-06		Expiration Date 07-14-08	
Eligibility Conditions ADV. P. TBYT		Travel with PCA Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Signature <i>Rosalind E. Lake</i>			

The person identified on this card has been determined "ADA Paratransit Eligible" in accordance with the provisions of 49 CFR Part 37 and may be entitled to receive complimentary paratransit service subject to the provisions thereof.

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2424 Piedmont Road N.E.
Atlanta, Georgia 30324-3330

Paratransit Services
 Telephone (404) 848-9399

Authorized by *Rosalind E. Lake*

Conditions For Use

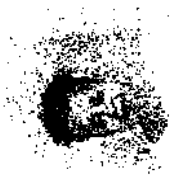
1. This card is MARTA property and is not transferable
2. Abuse will result in forfeiture of card.
3. A \$5.00 fee will be charged for replacement.

Defendant's Exhibit

A
 1623106-08
 University College of Arts and Sciences
 1000 University Ave., Room 1000
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Subject to applicable terms and conditions of
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LAKE
ROSALIND E

H

AK-05-35

0160 0399 1613 3501



Defendants Exhibit

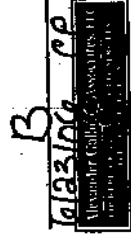


Exhibit E



Civil Rights Division

JKT:YR:HMM:par
DJ 166-012-3
2006-1018

Voting Section - NRB.
950 Pennsylvania Avenue, N.W.
Washington, DC 20530

April 21, 2006

Mr. Thurbert Baker
Attorney General
Mr. Dennis R. Dunn
Deputy Attorney General
40 Capitol Square, S.W.
Atlanta, Georgia 30334-1300

Re: Your File No. 2006-01

Dear Messrs. Baker and Dunn:

I am writing in reference to Act No. 432 (S.B. 84) (2006), which, as set forth in your submission:

- (1) requires the State Election Board to formulate and conduct a voter education program with particular emphasis on proper voter identification subject to funding;
- (2) creates and provides the requirements for issuance of the Georgia voter identification card, a new form of permissible voter identification to be available without cost or oath requirement, as an acceptable form of identification for voting purposes;
- (3) requires each county board of registrars to provide at least one location within the county for the issuance of Georgia voter identification cards;
- (4) requires that the State Election Board will provide each county board of registrars with the necessary equipment, forms, supplies, and training to produce Georgia voter identification cards; and,
- (5) requires the State Election Board to adopt rules and regulations for the administration of the Georgia voter identification card program

for the State of Georgia. The state submitted these changes to the Attorney General pursuant to Section 5 of the Voting Rights Act, 42 U.S.C. 1973c. We received your submission on February 21, 2006, and supplemental information was received on March 6, 2006.

cc: Records Inv. File Pub. File

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Our analysis indicates that the assignment of a voter education program to the State Election Board does not constitute a change subject to the preclearance requirement of Section 5. Voter education programs are a regular part of the duties of the Secretary of State, and the Supreme Court has made clear in *Presley v. Etowah County Commission*, 502 U.S. 491, 502-03 (1992) that such shifts in responsibility among State officials and fluctuations in budget fall are not subject to the requirements of Section 5. We also note that the rules and regulations for the administration of the Georgia voter identification card program have not yet been adopted, and accordingly are not currently capable of administration and properly before us for Section 5 review. Accordingly, no determination by the Attorney General is required or appropriate under Section 5. See *Procedures for the Administration of Section 5 of the Voting Rights Act* (28 C.F.R. 51.35).

~~The Attorney General does not interpose any objection to the addition of a new form of photo identification to be available to all voters for free, the requirement that there be at least one site in each county where such identification may be obtained, and the provision of support necessary to make such sites functional. However, we note that Section 5 expressly provides that the failure of the Attorney General to object does not bar subsequent litigation to enjoin the enforcement of the changes. In addition, as authorized by Section 5, we reserve the right to reexamine this submission if additional information that would otherwise require an objection comes to our attention during the remainder of the sixty-day review period. *Id.* at 28 C.F.R. 51.41 and 51.43.~~

We also stress that the Attorney General's determination regarding the precleared changes in Act No. 432 (S.B. 84)(2006) does not extend to changes that have yet to be adopted pursuant to the enabling portions of this legislation. See 28 C.F.R. 51.15. Specifically, the designation of each specific location or multiple specific locations within each of the State's 159 counties at which the new identification will be available will constitute a change affecting voting subject to the preclearance requirements of Section 5, just as the rules and regulations for the administration of the voter identification card program will require subsequent review. Therefore, the state and its local jurisdictions are not relieved of their responsibility to seek Section 5 review of any changes affecting voting that are proposed pursuant to this legislation. See 28 C.F.R. 51.15.

Sincerely,



John Tanner
Chief, Voting Section

Exhibit F

**RULES
OF
STATE ELECTION BOARD
GEORGIA ELECTION CODE**

**CHAPTER 183-1-20
GEORGIA VOTER IDENTIFICATION CARD**

TABLE OF CONTENTS

183-1-20-.01 Georgia Voter Identification Card.

(1) Intent and Purpose. These rules are promulgated pursuant to the authority granted the State Election Board under O.C.G.A. §§ 21-2-417.1 and 21-2-31. It is the intent of the State Election Board to provide for the time, place and manner in which each county Board of Registrars shall issue the Georgia Voter Identification Card to eligible electors and to provide for the acceptable types of documentation necessary to obtain a Georgia Voter Identification Card. To this end, the State Election Board has promulgated these rules and regulations.

(2) Application for the Georgia Voter Identification Card. Beginning with the July 18, 2006 Party Primary Election each county registrar shall provide the application for the Georgia Voter Identification Card in the form designed and published by the State Election Board or its member designee(s). Any registered voter who meets the criteria in O.C.G.A. § 21-2-417.1 and wishes to obtain a Georgia Voter Identification Card shall be required to submit the information requested in such application. It shall be the responsibility of each county registrar to ensure that each accepted application is complete.

(3) Availability of the Georgia Voter Identification Card.

(a) Each county shall provide a place within the voter registrar's primary or main office location, as previously approved by the Department of Justice, to process applications for Georgia Voter Identification Cards and to process and distribute such cards.

(b) Each county registrar's office may provide additional locations or extended hours for processing applications for the Georgia Voter Identification Card and processing and distributing the cards but shall be required to comply with criteria for establishment of additional voter registration places as outlined in 183-1-6-.03(3).

(c) Each county registrar's office shall be open a minimum of eight hours per day on Monday through Friday of the week before the final primary, election, or run-off election day, except for legally observed holidays, and shall otherwise be open during normal

business hours of the office in order to allow registered voters to apply for and obtain a Georgia Voter Identification Card.

(d) The voter registrar's office of each county shall provide the application and process the Georgia Voter Identification Card using the equipment, forms, supplies, and written training materials and/or verbal training provided by the State Election Board.

(e) Each county Board of Registrars shall sign and maintain an intergovernmental agreement provided by the State Election Board outlining the use of the equipment.

(4) Documentation required for application and issuance of the Georgia Voter Identification Card.

(a) In accordance with O.C.G.A. § 21-2-417.1(e), the Board of Registrars shall require the presentation and verification of the following information before issuing a Georgia Voter Identification Card:

1. A photo identity document, except that nonphoto identity document is acceptable if it includes both the applicant's full legal name and date of birth;

2. Documentation showing the applicant's date of birth;

3. Evidence that the applicant is registered to vote in the State of Georgia, either by voter precinct card, a new voter registration application or confirmation of voter's record on the statewide voter registration system or by verifying the original application in the voter registrar's office; and

4. Documentation showing the applicant's name and principal residence address.

(b) In determining whether the requirements of O.C.G.A. § 21-2-417.1(e) have been met, the following shall apply:

1. Any of the following which contains a photograph of the applicant shall constitute a photo identity document, as provided in O.C.G.A. § 21-2-417.1(e)(1):

(i) Student ID Card including public or private high school, college, university, or vocational school;

(ii) Transit Card;

(iii) Pilot's License;

(iv) Nursing Home Identification Card;

(v) Employee Identification Card;

(vi) Government Housing Authority Identification Card;

(vii) Any government issued license;

(viii) Any card accepted by local, state or federal government for the provision of benefits; or

(ix) Any card accepted by local, state or federal government for access to buildings.

2. Any of the following shall constitute a nonphoto identity document in lieu of a photo identity document as provided in O.C.G.A. § 21-2-417.1(e)(1) only if it includes both the applicant's full legal name and date of birth:

(i) Original birth certificate or certified copy of birth certificate;

(ii) Certificate of birth registration;

(iii) Voter Registration Application;

(iv) Copy of records filed in court by the applicant or on behalf of the applicant by the applicant's counsel;

(v) Naturalization documentation;

(vi) Copy of Marriage License Application;

(vii) A copy of the applicant's State or Federal Tax Return filed for the previous calendar year;

(viii) Any other document issued by local, state, or federal government so long as the document provides a reasonably reliable confirmation of the identity of the applicant;

(ix) Paycheck or paycheck stub bearing the imprinted name of the applicant's employer;

(x) An original of the annual social security statement received by the applicant for current or preceding calendar year;

(xi) An original of a Medicare or Medicaid statement received by the applicant;

(xii) Certified school record or transcript for current or preceding calendar year;

(xiii) Hospital birth certificate;

(xiv) An authenticated copy of a doctor's record of post-natal care; or

(xv) A federal Affidavit of Birth, form DS-10.

3. The registrar shall accept as documentation showing the applicant's date of birth under O.C.G.A. § 21-2-417.1(e)(2) any of the documents described in subparagraph (b) 2 above.

4. The registrar shall accept as proof of voter registration under O.C.G.A. § 21-2-417.1(e)(3) the applicant's voter registration application or a voter's precinct card.

5. Any of the documents described in subparagraphs (b)(1) and (2) shall be acceptable as documentation showing the applicant's name and address of principal residence under O.C.G.A. § 21-2-417.1(e)(4) if the documentation contains the applicant's name and address of principal residence. In addition, the registrar shall also accept the following as documentation showing the applicant's name and address of principal residence if the applicant's name and address of principal residence appears on the document:

(i) Voter Precinct Card;

(ii) Utility or cable bill issued within the last sixty (60) days;

(iii) Bank statement issued within the last sixty (60) days;

(iv) Currently valid rental contracts and/or receipts for payments made within the last sixty (60) days for rent payments;

(v) A copy of the applicant's State or Federal income tax return filed for the preceding calendar year;

(vi) Homeowners insurance policy or bill for current or preceding calendar year;

(vii) Mortgage, payment coupon, deed, or property tax bill for current or preceding calendar year;

(viii) Current Automobile Registration Receipt;

(ix) Homestead Exemption documentation; or

(x) W-2 for the preceding calendar year.

6. The application and supporting documentation of any applicant who is denied a Georgia Voter Identification Card shall be immediately forwarded via facsimile and U.S. mail to the State Election Board for automatic review to determine if the applicant has provided reasonably reliable documentary indicia confirming the identity of the applicant in which case the State Election Board shall direct the voter registrar to issue the Georgia Voter Identification Card.