

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

SERVICE EMPLOYEES : Civil Action No. _____
INTERNATIONAL UNION, LOCAL 1199 :
and THE NORTHEAST OHIO COALITION : Judge _____
FOR THE HOMELESS, :

Plaintiffs, :

DECLARATION OF SARA FELDENKRIS

vs. :

J. KENNETH BLACKWELL, :

Defendant. :

I, Sara Feldenkris, respectfully state as follows:

1. My name is Sara Feldenkris.
2. I am the Director of Government Relations for the Undergraduate Student Government at The Ohio State University.
3. One goal of the OSU Undergraduate Student Government is to have a large number of students vote in the November 2006 general election. We have worked toward accomplishing this goal by registering almost 1,700 students to vote.

4. Unfortunately, we have encountered some hurdles imposed by House Bill 3 and the new voter-identification requirements.

5. The confusing language of House Bill 3 has led some people wrongly to believe that you must have your current address on your driver's license in order to have it accepted as valid identification when voting.

6. Practically, such an interpretation would adversely affect many college students who wish to vote, and are registered to vote, at their college addresses.

7. House Bill 3 also allows voters to provide a utility bill, bank statement or paycheck to satisfy the voter-identification requirements.

8. Many college students cannot provide such identification. Students who live in dormitories or Greek housing do not have utility bills. Many students do not have a job. Many students do not switch their bank statements to a college address, especially a temporary address.

9. Given these hurdles imposed by House Bill 3 on the ability of college students to vote, I contacted various Boards of Elections and the Ohio Secretary of State's office to try to identify a solution.

10. The solution that I proposed was for elections officials to accept letters sent by The Ohio State University to students that contained each student's name and current address.

11. When I contacted Boards of Elections and the Ohio Secretary of State's office, I realized the true extent of the confusion over the new requirements. I was dismayed to learn that everyone I talked to had a different interpretation of the law, and gave me a different answer.

12. Different counties have different interpretations of the new voter-identification requirements and what must be provided by voters in order for them to cast a regular ballot.

13. For example, I was told by persons at the Butler and Hamilton County Boards of Elections that voters can provide their driver's licenses regardless of what address it shows.

14. I was told by a fellow member of USG that the Belmont County Board of Elections informed her that voters should not even provide their driver's license if it has a former address, and instead must provide an alternate form of identification.

15. Persons at the Franklin County Board of Elections gave me conflicting information.

16. One person at the Franklin County Board of Elections told me that voters who have former addresses on their driver's licenses must also provide an alternate form of identification, which could be a letter from The Ohio State University.

17. Another person at the Franklin County Board of Elections told me that a letter from The Ohio State University would not be an acceptable form of identification.

18. Another person at the Franklin County Board of Elections told me that voters should not even provide their driver's license if it has a former address.

19. Another person at the Franklin County Board of Elections told me that even if voters must cast provisional ballots they still use the same voting machines, so it is basically the same experience.

20. My concern is not for voters to have a good experience on Election Day, but instead to be able to exercise their right to vote as the laws and the United States Constitution allow them to do.

21. After becoming aware of these discrepancies, I contacted the Ohio Secretary of State's Office.

22. The assistant to the Director of Elections at the Ohio Secretary of State's office told me that voters must also show other proof of residency if their driver's licenses show a former address, and that this alternate proof could be a letter from The Ohio State University.

23. Unfortunately, the Ohio Secretary of State's office would not put this answer in writing. Nor would they agree to send out a directive or memorandum providing these instructions to Ohio's eighty-eight county Boards of Elections.

24. I am concerned and alarmed by these inconsistent interpretations of the new voter-identification laws by Ohio Boards of Elections and the Ohio Secretary of State's office.

25. As Director of Government Relations for the Undergraduate Student Government at The Ohio State University, I want college students to be able to cast their vote on November 7, 2006.

26. I fear that if Ohio's Boards of Elections do not apply clear and uniform standards under the new voter-identification laws—and tell voters what those standards are—then college students at The Ohio State University and elsewhere in Ohio will be deprived of their right to vote.

I declare under penalty of perjury that the above is true.

Executed on October ~~24~~²⁵, 2006.



Sara Feldenkris