UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

INDIANA DEMOCRATIC PARTY,

et al.,

Plaintiffs,

vs.

CAUSE NO: 1:05-CV-0634-SEB-VSS

TODD ROKITA, et al.,

Defendants.

WILLIAM CRAWFORD, et al.,

Plaintiffs,

vs.

MARION COUNTY ELECTION BOARD,

Defendant,

and

STATE OF INDIANA,

Intervenor.

AFFIDAVIT OF THELMA RUTH HUNTER

Comes now affiant Thelma Ruth Hunter, and after being first duly sworn upon her oath, states as follows:

1. My name is Thelma Ruth Hunter. I reside at 3504 Clifton, Indianapolis, IN 46208.
2. I was born on June 25, 1920 in Nashville, Tennessee in a home. My mother moved to Indianapolis when I was nine (9) months old and I have lived here ever since. I graduated from Crispus Attucks High School. I am single and have never been married.

3. I have never owned an automobile or had a driver’s license. I have always relied on public transportation and friends for my transportation needs.

4. Because I was born in a home eighty-five (85) years ago, there is no birth certificate in existence for me.

5. I have voted in just about every if not every election since I was old enough to vote. I have always voted in the Democratic Party primary. I last voted in 2004 in both the primary and general elections. I have always voted in person on election day and I have never voted by mail-in absentee ballot.

6. I heard about Indiana’s new photo ID law when I was attending a senior citizens’ club at my church, Trinity CME. I heard about the new law’s requirements from my congresswoman, Julia Carson. Because I do not have a driver’s license or any other form of state or federal issued photo ID, I was told that I would be required to obtain a photo ID from the Indiana BMV in order for me to vote in the next election. I was also informed that I would need to have a birth certificate in order to obtain a photo ID from the Indiana BMV.

7. Because I do not have a birth certificate, I was told that I would be required to send away to the State of Tennessee to obtain one. I did not know how to do this so I spoke with Joe Turner, the Constable in Pike Township, who offered to assist me in attempting to
obtain the birth certificate I would need in order to obtain a photo ID that I will need to vote in future elections. Constable Turner wrote away to the State of Tennessee for the forms I would need to fill out and is assisting me. He also paid out of his own pocket the $12.00 fee that the State of Tennessee is charging for the birth certificate I will need in order to get my photo ID.

8. On November 2, 2005 I sent the attached letter and supporting documents to the Tennessee Department of Health, all of which are marked as Exhibit A. I received a response dated November 21, 2005, attached as Exhibit B, indicating that the State of Tennessee cannot find my record of my birth but refusing to issue me a “delayed certificate of birth” for reason that “government agencies will not accept a delayed certificate of birth” at my present age.

Further affiant sayeth not.

Thelma Ruth Hunter

STATE OF INDIANA )
) SS:
COUNTY OF MARION )

Subscribed and sworn to before me, a Notary Public, in and for the State of Indiana, County of Marion, on this 13 day of December, 2005.

Printed: Thelma Ruth Hunter
Notary Public

County of Residence: Marion
My Commission Expires: 11.24.07
p/748/jo/jlb
TENNESSEE DEPARTMENT OF HEALTH
OFFICE OF VITAL RECORDS

TO WHOM IT MAY CONCERN:

SUBJECT: BIRTH CERTIFICATE - THELMA RUTH HUNTER

I HAVE NEVER HAD A BIRTH CERTIFICATE BECAUSE I WAS BORN AT HOME IN
NASHVILLE, TENN. TO WALTER HUNTER AND VASHTI (MOORE) HUNTER.

THE REASON NOW FOR A BIRTH CERTIFICATE IS THAT THE STATE OF INDIANA HAS
INACTED A LAW WHEREBY, VOTERS MUST OBTAIN A PICTURE IDENTIFICATION
FROM THE BUREAU OF MOTOR VEHICLE. TO GET A PICTURE IDENTIFICATION YOU MUST
PRODUCE A BIRTH CERTIFICATE. THERE LIES THE PROBLEM, THEREFORE, I AM
REQUESTING THAT A BIRTH CERTIFICATE BE ISSUED OR SOMETHING EQUIVALENT
TO A BIRTH CERTIFICATE.

YOUR IMMEDIATE ATTENTION WILL BE GREATLY APPRECIATED, THANKS IN ADVANCE.

[Signature]

THELMA R. HUNTER

EXHIBIT:

2L-A
APPLICATION FOR CERTIFIED COPY OF CERTIFICATE OF BIRTH
(Le versión en español al reverso de la página)

Date: 11-3-05

Full name on birth certificate: Thelma Ruth Hunter
First Name Middle Name Last Name

Has the name ever been changed other than by marriage? ☐ Yes ☑ No

If yes, what was original name? N/A

Date of birth: 6 25 1920
Month Day Year

Sex: Male or Female

Place of birth: Nashville
City Name

Hospital where birth occurred: Born at Home
County
State

Full name of father: Walter Hunter

Full maiden name of mother: Vashij Moore

Last name of mother at time of birth: Vashij Hunter

Next older brother or sister: Louise Elizabeth (Hunter) Younger: N/A

Signature of person making request: Thelma R. Hunter

Relationship: Self

Purpose of copy: To obtain a picture ID in the State of Tennessee

Telephone number where you may be reached for additional information: 317-925-5725

It is unlawful to willfully and knowingly make any false statement on this application.

* Government Issued ID Required With Signature

PRINT name and address of person to whom the certified copy is to be mailed.

SEND TO:

Thelma R. Hunter

2501 Clifton St.

INDIANAPOLIS, IN 46208

Tennessee Vital Records
421 5th Avenue North
1st floor, Central Services Building
Nashville, TN 37247

FILL OUT BELOW/ DO NOT DETACH

PH-1654 (Rev. 1/05)
RDA N/A
THELMA R. HUNTER 925-5975
NASHVILLE, TENN
6/25/20

TENNESSEE VITAL RECORDS
CENTRAL SERVICES BUILDING
1ST FLOOR
421 5TH AVENUE NORTH
NASHVILLE, TENN. 37247

1) Address
   3504 Clifton St. 46208
2) Parents Name (including Maiden Name)
   Vashti (Moore) Hunter
   Hunter
3) Copy of SS Card
4) Copy of Medicare Card

WWW2EstadoTNUS/HEALTH/VR

http://www2.state.tn.us/health/vr/FAQ.htm

9/13/2005
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<th>Other Items</th>
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**Billing Summary**

**Account Activity**

- 09/08/2005 Payment - Thank You
- 08/29/05, 09/08/05 Meter Reading
- 11/27/05 Next Reading Date

**Service Address**: 3004 Clifton St, Indianapolis, IN 46208-4144

**Metered Electric Service**:

| Customer ID | 457085 |

**Important Information**

Thank you for the opportunity to serve you this month. Call us at 241-6322 if we can be of more assistance.

**Status of Account**: 520991

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Attend Bands of America’s 30th Anniversary Grand National Championships November 9-12. See 100 of the best bands from across America in competition! For tickets & info visit www.bands.org or call 636-2263.
### Account Number: 000212342
### Site: 000171061
### Payment Due Date: OCT 20, 2005

#### MONTHLY STATEMENT

**Billing Summary**

- **Billing Date:** Oct 03, 2005
- **Service Address:** 3504 Clifton St, Indianapolis, IN 46208-4144
- **Service Provider:** Indianapolis Water Department of Public Works

<table>
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<td>7619 E</td>
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- **Last Statement:**
  - Payment received: $46.78
  - Current Charges: $7.55
    - Water base charge: $7.55
    - Water volume charge: $10.46
    - Water sales tax: $1.05
    - Sewer base charge: $2.39
    - Sewer volume charge: $0.01
    - Sewer summer adjustment: $3.01
- **Account Balance as of OCT 20, 2005:** $32.50

- **Late fees if paid after OCT 20, 2005**
  - Water charges: $0.75
  - Sewer charges: $1.34

**Important Information**

Detach here and return this portion with payment.

**Account Number:** 000212342
**Site:** 000171061
**Payment Due Date:** OCT 20, 2005

- **Amount to be paid by OCT 20, 2005:** $32.50
- **Amount to be paid after OCT 20, 2005:** $34.59

**Customer Name:** Hunter Thelma R
**Service Address:** 3504 Clifton St, Indianapolis, IN
**Make check payable to:** Indianapolis Water

**Payment Processing**
**PO Box 1890**
**Indianapolis, IN 46206-1990**
OFFICE OF VITAL RECORDS  
TENNESSEE DEPARTMENT OF HEALTH  
CENTRAL SERVICES BUILDING, 1ST FLOOR  
421 5TH AVENUE NORTH  
NASHVILLE, TENNESSEE 37247

THELMA R HUNTER  
3504 CLIFTON ST  
INDIANAPOLIS IN 46208

NOVEMBER 21, 2005

RE: Certificate of Birth FOR:  
THELMA RUTH HUNTER  
Date of Birth: JUNE 25, 1920  
County of Birth: Davidson

This is to certify that a thorough search has been made for a certificate of birth for the above named. The search was made for the years of 1915-1920-1921. For the period indicated no record was found for the above named individual born in Tennessee to Walter Hunter and Vashtia Moore Hunter. We have been advised that the Social Security Administration, and other government agencies will not accept a delayed certificate of birth filed at your present age. If you will take this letter to the agency to which you are to furnish proof of birth, you will be advised of the documents which are acceptable in place of a certificate of birth. Suggestions of such records accepted as documentary evidence are an early school record, the applicant’s marriage certificate or child’s birth certificate, next federal census after applicant’s birth, military discharge, etc.

Bernice Rader  

BERNICE RADER

FOR SHARON LEINBACH  
STATE REGISTRAR  
OFFICE OF VITAL RECORDS

EXHIBIT:

22-B

H536THE20051104RR38682, BR