

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CARRIE HARKLESS, TAMECA	:	CIVIL ACTION NO. 1:06-CV-2284
MARDIS, and ASSOCIATION OF	:	
COMMUNITY ORGANIZATIONS FOR	:	JUDGE PATRICIA A. GAUGHAN
REFORM NOW,	:	
	:	MAGISTRATE JUDGE
Plaintiffs,	:	NANCY A. VECCHIARELLI
	:	
vs.	:	
	:	
J. KENNETH BLACKWELL, in his	:	
official capacity as Secretary of State, and	:	
BARBARA RILEY, in her official	:	
capacity as Director of the Ohio	:	
Department of Job and Family Services,	:	
	:	
Defendants.	:	

DEFENDANT RILEY'S MANDATORY INITIAL DISCLOSURES

Defendant, Barbara Riley, Director of the Ohio Department of Job and Family Services (ODJFS), hereby submits these initial disclosures pursuant to Rule 26 of the Federal Rules of Civil Procedure. Defendant Riley makes these disclosures based on information currently known by ODJFS prior to the commencement of discovery in this action and reserves the right to supplement, amend or modify these Mandatory Initial Disclosures to the extent required by the Federal Rules of Civil Procedure in the event ODJFS becomes aware of new, additional or different information.

The persons that are likely to have discoverable information and support ODJFS claims in this action include, without limitation, the following:

A. Names of people likely to have discoverable information.

1. Defendants (all c/o Anne Light Hoke, Ohio Attorney General's Office, 30 East Broad Street, 26th Floor, Columbus, Ohio 43215.)

Paul Fraunholtz

Joel Potts

2. Plaintiffs

Carrie Harkless

Tameca Mardis

Employees, representatives or members of ACORN, including, without limitation:
Barbara Clark and Katy Gall.

3. Non-Party Witnesses

Anne Bringman

Professor S. Candace Hoke

Cynthia Samples

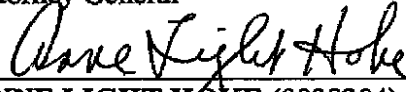
Roslyn Talerico

- B. The documents in the possession, custody or control of ODJFS that may be used to support its claims in this action include, without limitation, correspondence with county department of job and family services informing/reminding them of their voter registration obligations; correspondence with ACORN; and agendas of meetings with the directors of county department of job and family services informing/reminding them of their voter registration obligations.

Sincerely,

JIM PETRO (0022096)

Attorney General



ANNE LIGHT HOKE (0039204)

REBECCA THOMAS (0066650)

Trial Attorneys for Defendant Barbara Riley

Assistant Attorneys General

Health & Human Services Section

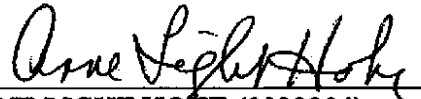
30 East Broad Street, 26th Floor

Columbus, Ohio 43215

Phone: (614) 466-8600

CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2006 I have mailed by U.S. Postal Service a copy of the aforementioned to the following counsel for Plaintiffs, (1) Neil Steiner, Robert Topp, Eliot Gardner, and William Gibson, DECHERT LLP, 30 Rockefeller Plaza, New York, New York 10112; (2) Lisa Danetz and Brenda Wright, NATIONAL VOTING RIGHTS INSITUTE, 27 School Street, Boston, Massachusetts 02108; (3) Jon M. Greenbaum and Benjamin Blustein, LAWYERS' COMMITTEE FOR CIVIL RIGHTS UNDER LAW, 1401 New York Avenue, Suite 400, Washington, D.C. 20005, (4) Brian Mellor, PROJECT VOTE, 1486 Dorchester Avenue, Dorchester, Massachusetts 02122, and (5) Diane Taylor Kollis, FRIEDMAN, DOMIANO & SMITH CO., 1370 Ontario Street, Sixth Floor, Cleveland, Ohio 44113, and to Richard Coglianesse, Constitutional Services, Ohio Attorney General's Office, 30 East Broad Street, Level 17, Columbus, Ohio 43215, Counsel for Defendant, Secretary of State J. Kenneth Blackwell.



ANNE LIGHT HOKE (0039204)

REBECCA THOMAS (0066650)

Assistant Attorneys General