AFFIDAVIT OF CLAUDIA COULTON

1. My name is Claudia Coulton. I have a PhD from Case Western Reserve University in Social Welfare.

2. I have published over 70 articles in professional journals on social science and social policy. Some of the more relevant articles that I have recently authored are: one which is entitled "Metropolitan Inequalities and the Ecology of Work" which was published in the Social Service Review in 2003, and a second article which was entitled "Geographic Concentration of Affluence and Poverty" which was published in Urban Affairs Review in 1996 (which was based on the Census).

3. I've been doing research for the past 15 years on minority and low income communities in Northeast Ohio.

4. I am a professor at Case Western Reserve University's Mandel School of Applied Social Sciences.

5. I also co-direct the Center on Urban Poverty and Social Change. I do research on poverty and economic disadvantage, which in Ohio is concentrated among African Americans.

6. Based on my research, readings, and review of the relevant literature, I can say with complete confidence that African Americans and Latinos in Cuyahoga County change addresses at a more frequent rate than white residents within the county. Among other things, one can see this by reviewing the year 2000 census data for Cuyahoga County and looking at the percentage of household heads that moved within the previous year. The proportion of the population that moved within the year was 15% for whites, 22% for blacks and 32% for Hispanics. Another measure of residential relocation from the 2000 census is the population that lived in a different house in 1995. This data is used to estimate the percentage of the population that has moved at least once in the previous 5 years. The percentages are as follows: Whites, 37%; Blacks, 46%; and Hispanics, 57%.

7. I work also a consultant for various national foundations that are trying to improve conditions in African-American, Hispanic and low income neighborhoods. My experience working with these foundations has made me realize that many of these communities are concerned about low rates of voter registration within their communities.

FURTHER AFFIANT SAYETH NAUGHT.

Claudia Coulton

Sworn to before me this 25th day of October 2004.

Notary Public

EDITH L. REED
Notary Public, State of Ohio, Cuy. Cty.
My commission expires June 3, 2007
AFFIDAVIT OF PEARL S. LIVINGSTONE

County of Cuyahoga               ss
State of Ohio                     

PEARL S. LIVINGSTONE, being duly sworn, hereby declares the following to be true:

1. She is a citizen of the United States, over eighteen years of age and a lifelong resident of Cuyahoga County, Ohio, living at 13415 Shaker Blvd., Cleveland, OH 44120. She is a graduate of Brown University and received a masters in curriculum from Case Western Reserve University. She is a retired school teacher from the Brecksville City School District, having taught 22 years. In two of her teaching years she was named teacher of the year, once by her teaching colleagues and once by the parent-teachers association. She serves as a volunteer placement officer with Court Community Service and is a docent at the Peter B. Lewis Building on the campus of Case University.

2. On or about September of 2003, she organized a group of roughly 47 volunteers to work as a subgroup of the Greater Cleveland Voter Registration Coalition.

   a. Each volunteer would receive training in the requirements of completing the voter registration form, the prohibitions of partisan advocacy and the procedure for returning the completed forms to affiant. See Exhibit A for training materials.

   b. Affiant's group would station two to three volunteers at one or two supermarkets on Saturdays and Sundays from 10 A.M. to 4 P.M. and offer to assist unregistered individuals or whose addresses or names had changed with filling out the official voter registration application or change of address or name form.

   c. After such forms were completed, the volunteers would turn in the completed forms to affiant on Sunday evening.

   d. Affiant would review the cards for minor omissions or errors and call the applicant for corrections which she would make.

   e. Affiant would Xerox the cards, alphabetize them and retain the copies in a date identified bundle.

   f. Affiant delivered the original forms to Marcia McCoy, acting for the Coalition who would deliver them to the Board of Elections on Monday.

3. The following is a listing of the times her group assisted individuals in filling out the voter registration forms:
a. Commencing on September 20, 2003, each weekend until the close of registration for the general election on October 4, 2003.


e. Commencing with April 3-4, 2004, the first or second weekend of each month until the Labor Day weekend and thereafter on every weekend until the close of registration for the general election on October 4, 2004.

4. The following are the locations at which affiant’s group assisted individuals:

a. Tops Market – E.115th & Buckeye

b. Dave’s Supermarket – E.74th & Harvard

c. Tops Market – Harvard & Lee

d. Tops Market – Turney Rd. in Garfield Heights

e. Tops Market – Northfield & Rockside

f. Dave’s Supermarket – Lakeshore Blvd.

5. Attached as Exhibit B1-18 are copies of emails to volunteers regarding scheduling.

6. The week before the March, 2004 primary election, members of affiant’s group called or attempted to call or contact all the applicants whom they had assisted to determine whether they had been notified of the confirmation or rejection of their registration application. Almost immediately affiant was notified by her callers that cards had not been received notifying the applicants of their acceptance.

a. She checked with the BOE and was advised that the all the cards confirming registration or change of name or address would be mailed by first class bulk mail on the Thursday before the election.

b. A conference call was arranged among Director Vu, Marcia McCoy and affiant in which affiant and Marcia McCoy expressed concern that voters who had applied months in advance were not being advised of their registration or polling location until the last minute. Director Vu assured his callers that the cards would certainly be received by Friday or Saturday before election and in the future cards would be sent out within two weeks after application for registration was received. Affiant suggested that the telephone lines be open on Saturday to answer inquiries concerning voting confirmation and polling location.
c. Affiant’s group called a number of individuals whom they had assisted on Saturday and Sunday before the primary election and found that no registration confirmation cards had been received.

d. Near the end of March, members of affiant’s group called a number of applicants whom they had assisted and found that some individuals had just received their notification cards from the BOE.

7. From time to time during April through late August, 2004 affiant’s group called the applicants they had assisted to determine whether they had received confirmation from the BOE and if not, affiant’s group either called the BOE or faxed lists to them of applicants not having received confirmation.

a. On April 9, 2004 affiant spoke with Michael DeFranco at the BOE who is supervisor of registration and mentioned a list of applicants who had not received confirmation of registration or rejection and, at his request, faxed the list attached as Exhibit B to him. Mr. DeFranco responded.

b. Subsequently in April, after again checking with the applicants, the list attached as Exhibit C was faxed to Mr. DeFranco.

c. On or about June 15, 2004 affiant faxed the list attached as Exhibit C-1 to the BOE and received a faxed response attached as Exhibit C-2.

8. During September, 2004, various persons advised members of affiant’s group that they had not received confirmation of registration even though they had attempted to register more than once. After several calls to the BOE regarding these persons, on October 4, 2004, affiant faxed the list attached as Exhibit D to the BOE to which there was no response.

9. The voter registration lists were certified on or about October 13, 2004. 47 members of affiant’s group thereupon commenced calling the applicants whom they had assisted. As of October 15, 2004 affiant and members of her group doing calling reported to affiant.

a. If such applicants had not received confirmation of registration, affiant and other group members attempted to verify through calling the BOE or checking the BOE’s computer data base whether such applicants were registered. If they were reported as rejected or not in the system, affiant checked the copy of such applicant’s card and found the following:

I. In the 6/6/04 batch of applicants:

1. Harold Smith was reported “not in system”. Affiant understands that to mean that there is no record of such application either on the voter registration list or on the Fatal Pending List. Other applicants in that batch were registered.
II. In the 9/11/04 batch:

1. Stephen Perkins, Jr. – A copy of the registration form which the
Coalition assisted applicant to complete and deliver to the BOE is
attached as Exhibit E-1. Affiant notes that the street name on card
could be read as “Coit” but actually is Coit. The zip code is
correct for Coit Rd. This was pointed out to the BOE, but an
employee in the registration department said there was no such
address and therefore he couldn’t vote.

2. Orlando Reilly – A copy of the registration form which the
Coalition assisted applicant to complete and deliver to the BOE is
attached as Exhibit E-2. BOE advises that he is not in system
currently.

3. LaTanya Farmer – A copy of the registration form which the
Coalition assisted applicant to complete and deliver to the BOE is
attached as Exhibit E-3. BOE advises she is not in the system.

4. Michael Goins – A copy of the registration form which the
Coalition assisted applicant to complete and deliver to the BOE is
attached as Exhibit E-4. On October 19, 2004 affiant was advised
by Eileen at the BOE that applicant was not in the system and that
“they are done entering into the system. He can’t vote. All has
been entered”.

5. Nathaniel Lockhart – A copy of the registration form which the
Coalition assisted applicant to complete and deliver to the BOE is
attached as Exhibit E-5. Affiant was told by the BOE that there
was a Nathaniel Lockhart in the system but inactive at another
address. The new registration is not in the system and therefore he
cannot vote. The birth date on their inactive records and on the
attached exhibit are the same.

6. Donald McCain - A copy of the registration form which the
Coalition assisted applicant to complete and deliver to the BOE is
attached as Exhibit E-6. Affiant was advised by the BOE that his
name is in the system at a former address. The BOE advised he
could vote a provisional ballot.

7. Joseph McDaniel - A copy of the registration form which the
Coalition assisted applicant to complete and deliver to the BOE is
attached as Exhibit E-7. The BOE advises that he is to vote in
Cleveland Heights at Severance Tower rather than a precinct near
his address.

8. Theresa Matteson - A copy of the change of address form which
the Coalition assisted applicant to complete and deliver to the BOE
is attached as Exhibit E-8. The BOE advised that she was listed at an old address on Storer and that she should vote a provisional ballot.

9. Verna Craighead Green - A copy of the registration form which the Coalition assisted applicant to complete and deliver to the BOE is attached as Exhibit E-9. The BOE advised that there is a Verna Green but not a Verna Craighead Green on its records at a Lafayette address at which she had lived and that she should bring identification and vote a provisional ballot.

III. In the 9/12/04 batch:

1. Michael Allen - A copy of the registration form which the Coalition assisted applicant to complete and deliver to the BOE is attached as Exhibit F. The BOE advised that he was listed on Washington Blvd. in Cleveland Heights and not on Washington Park Dr. in Cleveland with the 44105 zip code.

IV. In the October 2, 3, 2004 batch, Volunteer Debbie Paris reached some 28 out of 67 applicants. Of those reached, 10 had not heard from the BOE including the following:

1. Jonathan Cunningham – A copy of the registration form which the Coalition assisted applicant to complete and deliver to the BOE is attached as Exhibit G-1. Valerie at the BOE said he was on the Fatal Pending List, that is, the list of rejected applications, for the reason that the BOE read his address as 14607 instead of 19607. She said she would try to correct.

2. Norrita Evans - A copy of the registration form which the Coalition assisted applicant to complete and deliver to the BOE is attached as Exhibit G-2. Valerie at the BOE said that she was registered at 11107 not 11101. She said she would be unable to change.

3. Kathy Dozier - A copy of the registration form which the Coalition assisted applicant to complete and deliver to the BOE is attached as Exhibit G-3. The BOE said it could not find the application.

10. On or about October 17, 2004 affiant's group started calling the applicants they had assisted in completing applications to determine whether they had been notified by the BOE of their registration and polling location. The callers were to follow the instructions attached as Exhibit H. Of the 47 callers with roughly the same number of applicants to call, some 25 have reported the answers received and the names listed on the attached Exhibit I are those who did not receive notification. Copies of their applications are attached as Exhibit J.
11. Affiant and other members of her group have received misinformation from employees of the Board concerning registered voters who have attempted to change their address. When such names were checked with the BOE they were found not to have the address change. The BOE advised that the voter should vote a provisional ballot at his/her new precinct. It is my understanding that Ohio law permits such voters to change their registration at the polling place and to vote a regular, not a provisional ballot. The following are the names of some of the voters about whom the misinformation was given:

a. Daniel McCain

b. Renitae Chambliss

c. Theresa Matteson

12. Affiant's experience indicates that the BOE has made numerous errors in inputting names and addresses both for new applications for registration and for change of address or name applications. It also has apparently lost numerous applications submitted to them, not provided adequate access to the records for telephone callers, has furnished misleading information and has been unwilling for the most part to correct errors demonstrated to them.

[Signature]
Pearl S. Livingstone

SWORN TO AND SUBSCRIBED IN MY PRESENCE, on October 25, 2004, at Cleveland, Ohio.

[Signature]
Fred J. Livingstone – Notary Public
My Commission has no expiration date
AFFIDAVIT OF JUDY GALLO

County of Cuyahoga )
) ss
State of Ohio )

JUDY GALLO, being duly sworn, hereby declares the following to be true:

1. Affiant is a citizen of the United States, over eighteen years of age and a resident of Cuyahoga County, Ohio, living at 6409 Dellbank Drive, Cleveland, Ohio, 44144. She is a graduate of Wilson College, and has a Master's Degree from Stanford University, and a diploma in nursing from MetroHealth Medical Center School of Nursing. She is the Community Outreach Coordinator of the United Labor Agency and co-convener of the Greater Cleveland Voter Registration Coalition.

2. Affiant helped to initiate the Greater Cleveland Voter Coalition roughly in the spring of 2003. The concept was to unite a number of disparate groups in a labor and community effort to encourage participation in voting. More than 50 separate groups joined the Coalition and same are listed on Exhibit A attached. The plan was to assist in the registration of new voters and change of address and names on the registration records. Affiant arranged for the training of volunteers who would be assigned to supermarkets, primarily Dave's and Tops, and to community events, festivals, health clinics, hunger centers, places of worship, concerts, etc. One volunteer would act as leader. The volunteers would assist individuals to fill out the registration application or the change of address or name application. Same would be collected and delivered by the volunteer leader to affiant. Those applications would be copied and the originals delivered to the Board of Elections one or two times a week, mostly by Patrick McGraw, a volunteer with the Coalition. Some leaders would arrange to copy the cards collected by his/her team and would deliver the applications to the Board of Elections and the copies to affiant. Approximately 10,000 completed applications were so delivered.

FURTHER AFFIANT SAYETH NAUGHT.

[Signature]

Judy Gallo

SWORN TO AND SUBSCRIBED IN MY PRESENCE on October 25, 2004.

[Signature]
Notary Public
AFFIDAVIT OF PATRICK McGRAW

County of Cuyahoga

) ss

State of Ohio

) )

PATRICK McGRAW, being duly sworn, hereby declares the following to be true:

1. Affiant is a citizen of the United States, over eighteen years of age and a resident of Cuyahoga County, Ohio, living at 2753 Lancashire Rd., Cleveland Heights, OH. He is a volunteer with the Greater Cleveland Voter Registration Coalition.

2. During the last year affiant has worked with the Greater Cleveland Voter Coalition and with Judy Gallo, a co-convener of the Coalition. He has delivered personally voter registration applications and applications for change of name or address to the Board of Elections after same have been collected by Judy Gallo from groups assisting individuals to apply for registration or change of address or name.

[Signature]

Patrick McGraw

SWORN TO AND SUBSCRIBED IN MY PRESENCE on October , 2004.

[Signature]

Notary Public
AFFIDAVIT OF MARCIA McCoy

County of Cuyahoga )
) ss
State of Ohio )

MARCIA McCoy, being duly sworn, hereby declares the following to be true:

1. Affiant is a citizen of the United States, over eighteen years of age and a resident of Cuyahoga County, Ohio, living at 3431 East 142nd St., Cleveland, OH 44120. She is a graduate of Cleveland State University, Department of Urban Affairs and a recipient of the Women As Leaders award. She is the Political Director of the Cleveland AFL-CIO and co-convener of the Greater Cleveland Voter Registration Coalition.

2. Affiant has worked with the Greater Cleveland Voter Coalition through a group called Voices of the Electors and with Pearl Livingstone’s subgroup to assist individuals with voter registration applications and change of address or name applications. In that connection, on Mondays she would pick up the applications the Livingstone subgroup collected during the previous weekend from the residence of Pearl Livingstone and deliver same personally to the Board of Elections that day. On several occasions affiant delivered the applications to Virginia Robinson to deliver to the Board of Elections.

3. On or about October 4, 2004, I obtain a computer disc of the Fatal Pending List from the Board of Elections of Cuyahoga County. Mr. Michael Skindell arranged the list to show by zip code the number of people on the on the Fatal Pending List. A print out of that arranged list is attached hereto as Exhibit A.

[Signature]
Marcia McCoy

SWORN TO AND SUBSCRIBED IN MY PRESENCE on October 24, 2004.

[Signature]
Fred J. Livingstone – Notary Public
My commission has no expiration date
AFFIDAVIT OF VIRGINIA ROBINSON

County of Cuyahoga )
       ) ss
State of Ohio       )

VIRGINIA ROBINSON, being duly sworn, hereby declares the following to be true:

1. Affiant is a citizen of the United States, over eighteen years of age and a resident
   of Cuyahoga County, Ohio, living at 26343 Forbes Rd., Oakwood Village, OH 44146.
   She is the Treasurer of the Cleveland AFL-CIO.

2. Affiant has worked with the Greater Cleveland Voter Coalition to assist Marcia
   McCoy deliver applications personally to the Board of Elections Monday. On several occasions
   affiant delivered the applications personally. She is the Treasurer of the Cleveland AFL-CIO.

Virginia Robinson

SWORN TO AND SUBSCRIBED IN MY PRESENCE on October 1, 2004.

Fred J. Livingstone - Notary Public
My commission has no expiration date

CORRECTIONS SWORN TO ME TELEPHONICALLY BY

[Signature]

STEPHEN C. TITUS - NOTARY
MY COMMISSION HAS NO EXPIRATION DATE
AFFIDAVIT OF MICHAEL HARWELL

County of Cuyahoga )

ss:

State of Ohio )

MICHAEL HARWELL, having been duly sworn, hereby declares the following as true:

1. I am a United States citizen.

2. I am 18 years of age.

3. I reside at 1754 Rosedale Avenue, East Cleveland, Ohio.

4. In 2000, I submitted a voter registration form to the Cuyahoga County Board of Elections. I have not voted since that time.

5. I have been advised that an electronic search of the Board of Elections records indicated that I am on a list of persons ineligible to vote, apparently for the reason that the Board's records indicate an invalid address for me.

6. It is possible that the voter registration form I filed may have erroneously indicated my street address as 1756, rather than 1754, Rosedale Avenue, East Cleveland.


FURTHER AFFIANT SAYETH NAUGHT.

MICHAEL HARWELL

Sworn to before me this 24th day of October 2004.

Notary Public

MOLLY WESSER, ATTY.
NOTARY PUBLIC • STATE OF OHIO
My Commission Has No Expiration Date
Section 147.03 O.R.C.
AFFIDAVIT OF JOLENA OGLESBY

County of Cuyahoga )
    ss:
State of Ohio )

JOLENA OGLESBY, having been duly sworn, hereby declares the following as true:

1. I am a United States citizen.

2. I am 25 years of age.

3. I reside at 11319 Durant Avenue, Cleveland, Ohio, 44108.

4. I strongly wish to vote in the November 2, 2004 presidential election.

5. On September 7, 2004 or September 9, 2004, in the vicinity of Cleveland Justice Center in downtown Cleveland, I filled out a voter registration form and submitted it to a volunteer from the Greater Cleveland Voter Registration Coalition who was signing up people to vote.

6. On October 2, 2004, to be safe, I filled out a second registration form and submitted it to a volunteer with the Greater Cleveland Voter Registration Coalition near a Tops supermarket on Superior Avenue.

7. A copy of the registration form which I filled out and signed is attached to this Affidavit.

8. Since I was moving at the time I filled out the voter registration forms, I entered my mother's address, 2548 Park Midway, Suite C, Cleveland, Ohio, 44104, as a temporary address.

9. I have never received a voter registration card, or any other communication from the Cuyahoga County Board of Elections ("BOE") indicating whether or not I am now a registered voter.

10. To my knowledge, I am still not registered so that I can vote in the November 2, 2004 election.

FURTHER AFFIANT SAYETH NAUGHT.

[Signature]

Sworn to before me this 24th day of October 2004.

[Signature]
Notary Public
Are you a U.S. citizen? ☐ Yes ☑ No
Will you be 18 years of age or before the next general election? ☑ Yes ☐ No
If you answered NO to either of the questions, do not complete this form.

Last Name: OGLESBY
First Name: JOLENA
Middle Name or Initial: Jr., II, etc.

House Number and Street (Give new address if changed):
2548 PARKMIDWAY

Apartment or Lot #: Suite C

City or Post Office: Cleve
Zip Code: 44104

Additional Rural or Mailing Address (If necessary):

County where you live: Cuyahoga

Birthdate (MO-DAY-YR): 03-01-79
Ohio driver’s license No. or last 4 digits of Social Security No. (required): 6704

Previous House Number and Street:

City, Village, Twp.:

Previous City or Post Office:

Ward:

CHANGE OF NAME ONLY

State:

Former Legal Name:

Former Signature:

School Dist.:

Cong. Dist.:

Senate Dist.:

House Dist.:

Address Change Only: Previous Address

Date signed: 10/02/04

EVER SWOM TO THE COURT OF JURISDICTION WHERE ELECTIONS ARE HELD THAT NO FALSE STATEMENTS WERE MADE IN THIS APPLICATION.

Cuyahoga County Board of Elections

Not in system

In system, but data pending, no apparent problems

Invalid address, street # doesn't exist
AFFIDAVIT OF VENITA MEREDITH

County of Cuyahoga

State of Ohio

VENITA MEREDITH, having been duly sworn, hereby declares the following as true:

1. I am a United States citizen.

2. I am 18 years of age.

3. I reside at 551 Helper Drive, Bedford, Ohio.

4. I first completed a voter registration form in September 2004. I gave my completed voter registration form to a volunteer from the Greater Cleveland Voter Registration Coalition who was signing up people to vote.

5. I completed another voter registration form later in September 2004 just to be sure that I would make it on the voter rolls. I gave that completed voter registration form as well to a volunteer from the Greater Cleveland Voter Registration Coalition who was signing up people to vote.

6. I have never received any communication from the Cuyahoga County Board of Elections ("BOE") indicating whether or not I am a registered voter.

7. On or about October 2, 2004, I went to the BOE office to check whether I was on the voter rolls.

8. While I was at the BOE office, a BOE employee I spoke with told me that I was not registered to vote. That employee told me to “wait a couple of weeks.”

9. While I was at the BOE on or about October 2, 2004, I submitted yet a third voter registration form.

10. To my knowledge, I am still not on the voter rolls. I do not know why I am not on the voter rolls.

11. I strongly wish to vote in the upcoming presidential election on November 2, 2004.

FURTHER AFFIANT SAYETH NAUGHT.

Sworn to before me this 22nd day of October 2004.

Notary Public

[Signature]

[Stamp]
Please read instructions on reverse side

Please type or print clearly with black pen

1. Are you a U.S. citizen? ☑ Yes ☐ No (Required)
2. Will you be 18 years of age or before the next general election? ☑ Yes ☐ No (Required)
   If you answered NO to either of the questions, do not complete this form.

3. Last Name
   Meredith
4. First Name
   Virginia
5. Middle Name or Initial
   Jr.
6. Suffix
   NONE
7. House Number and Street (Enter new address if changed)
   201 HEDLEY PL
8. Apt. or Lot #
   3
9. City or Post Office
   CLEVELAND
10. ZIP Code
    OH 44115
11. County where you live
    Cuyahoga
12. FOR BOARD USE ONLY
    1-02-81
13. ADDRESS CHANGE ONLY - PREVIOUS ADDRESS
   Previous House Number and Street
   Previous City or Post Office
   County
   State
   CITY
   WARD
14. CHANGE OF NAME ONLY
   Former Legal Name
   Former Signature
   ID Number
   PRECINCT
   Date signed
   ID Date YR
   10/21/04
   (Required)
   ☑
   (Required)
   MO
   DAY
   YR
   10 21 04
   Signature of Applicant
   D. MOORE
   ✏
   WHOEVER COMOLTS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE.

Cuyahoga County Board of Elections, 2925 Euclid Avenue, Cleveland, Ohio 44115-2497

1918 NOT in system
AFFIDAVIT OF LATANYA TERESE FARMER

County of Cuyahoga  

ss: 

State of Ohio  

LATANYA TERESE FARMER, having been duly sworn, hereby declares the following as true:

1. I am a United States citizen.

2. I am 18 years of age.

3. I reside at 4160 East 144th Street, Cleveland, Ohio 44128

4. On or about September 11, 2004, I filled out a voter registration form with the assistance of a volunteer from the Greater Cleveland Voter Registration Coalition who arranged to deliver it to the Cuyahoga County Board of Elections. A copy of the voter registration form that I filled out and signed is annexed hereto as an exhibit.

5. I have not has received notification that I am registered to vote. Thus, to my knowledge, I am not listed as a registered voter with the Board of Elections.


FURTHER AFFIANT SAYETH NAUGHT.

[Signature]

Sworn to before me this 30th day of October 2004.

[Signature]

Notary Public

MICHAEL V. HEPFERNAN, ATTY.
NOTARY PUBLIC • STATE OF OHIO
My commission expires on registration date Section 147.03 O.R.C.
<table>
<thead>
<tr>
<th>Field</th>
<th>Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Case</td>
<td>1:04-cv-02147-PRM</td>
</tr>
<tr>
<td>Document</td>
<td>5-3</td>
</tr>
<tr>
<td>Filed Date</td>
<td>10/25/2004</td>
</tr>
<tr>
<td>Page</td>
<td>18</td>
</tr>
<tr>
<td>Document Text</td>
<td>Cuyahoga County Board of Elections, 2925 Euclid Avenue, Cleveland, Ohio 44115-2497</td>
</tr>
</tbody>
</table>

**Please read instructions on reverse side:**

1. Are you a U.S. citizen? **Yes**
2. Will you be 18 years of age or before the next general election? **Yes**
3. If you answered NO to either of the questions, do not complete this form.
4. Last Name: **Drake**
5. First Name: **Geneva**
6. Middle Name or Initial: **(Required)**
7. House Number and Street (Enter new address if changed): **3385 East 147 St.**
8. Apt. or Lot #: **(Required)**
9. City or Post Office: **Cleveland**
10. Zip Code: **44120**
11. Birthdate (Required): **09/19/1930**
12. Ohio Driver's License No. OR last 4 digits of Social Security No. (Required): **123-45-6789**
13. Phone No. (Voluntary): **991-014**
14. Signature of Applicant (Required): **Geneva Drake**

**Please type or print clearly with black pen:**

1. Are you a U.S. citizen? **Yes**
2. Will you be 18 years of age or before the next general election? **Yes**
3. If you answered NO to either of the questions, do not complete this form.
4. Last Name: **Former**
5. First Name: **YoMaya**
6. Middle Name or Initial: **(Required)**
7. House Number and Street (Enter new address if changed): **3300 E 147th St.**
8. Apt. or Lot #: **(Required)**
9. City or Post Office: **OH**
10. Zip Code: **44120**
11. Birthdate (MM-DD-XX): **06-09-80**
12. Ohio Driver's License No. OR last 4 digits of Social Security No. (Required): **271-80-1179**
13. Phone No. (Voluntary): **(614) 751-4329**
14. Signature of Applicant (Required): **YoMaya Former**

**Please type or print clearly with black pen:**

1. Are you a U.S. citizen? **Yes**
2. Will you be 18 years of age or before the next general election? **Yes**
3. If you answered NO to either of the questions, do not complete this form.
4. Last Name: **Jaimes**
5. First Name: **(Required)**
6. Middle Name or Initial: **(Required)**
7. House Number and Street (Enter new address if changed): **(Required)**
8. Apt. or Lot #: **(Required)**
9. City or Post Office: **(Required)**
12. Ohio Driver's License No. OR last 4 digits of Social Security No. (Required): **816**
13. Phone No. (Voluntary): **(Required)**
14. Signature of Applicant (Required): **YoMaya Jaimes**

**Please type or print clearly with black pen:**

1. Are you a U.S. citizen? **Yes**
2. Will you be 18 years of age or before the next general election? **Yes**
3. If you answered NO to either of the questions, do not complete this form.
4. Last Name: **(Required)**
5. First Name: **(Required)**
6. Middle Name or Initial: **(Required)**
7. House Number and Street (Enter new address if changed): **(Required)**
8. Apt. or Lot #: **(Required)**
9. City or Post Office: **(Required)**
12. Ohio Driver's License No. OR last 4 digits of Social Security No. (Required): **(Required)**
13. Phone No. (Voluntary): **(Required)**
14. Signature of Applicant (Required): **(Required)**

**Please type or print clearly with black pen:**

1. Are you a U.S. citizen? **Yes**
2. Will you be 18 years of age or before the next general election? **Yes**
3. If you answered NO to either of the questions, do not complete this form.
4. Last Name: **(Required)**
5. First Name: **(Required)**
6. Middle Name or Initial: **(Required)**
7. House Number and Street (Enter new address if changed): **(Required)**
8. Apt. or Lot #: **(Required)**
9. City or Post Office: **(Required)**
12. Ohio Driver's License No. OR last 4 digits of Social Security No. (Required): **(Required)**
13. Phone No. (Voluntary): **(Required)**
14. Signature of Applicant (Required): **(Required)**

**Please type or print clearly with black pen:**

1. Are you a U.S. citizen? **Yes**
2. Will you be 18 years of age or before the next general election? **Yes**
3. If you answered NO to either of the questions, do not complete this form.
4. Last Name: **(Required)**
5. First Name: **(Required)**
6. Middle Name or Initial: **(Required)**
7. House Number and Street (Enter new address if changed): **(Required)**
8. Apt. or Lot #: **(Required)**
9. City or Post Office: **(Required)**
12. Ohio Driver's License No. OR last 4 digits of Social Security No. (Required): **(Required)**
13. Phone No. (Voluntary): **(Required)**
14. Signature of Applicant (Required): **(Required)**

**Please type or print clearly with black pen:**

1. Are you a U.S. citizen? **Yes**
2. Will you be 18 years of age or before the next general election? **Yes**
3. If you answered NO to either of the questions, do not complete this form.
4. Last Name: **(Required)**
5. First Name: **(Required)**
6. Middle Name or Initial: **(Required)**
7. House Number and Street (Enter new address if changed): **(Required)**
8. Apt. or Lot #: **(Required)**
9. City or Post Office: **(Required)**
12. Ohio Driver's License No. OR last 4 digits of Social Security No. (Required): **(Required)**
13. Phone No. (Voluntary): **(Required)**
14. Signature of Applicant (Required): **(Required)**
AFFIDAVIT OF CHAUNTIA MARIE DIMMINGS

County of Cuyahoga  

     ss:

State of Ohio  


CHAUNTIA MARIE DIMMINGS, having been duly sworn, hereby declares the following as true:

1. I am a United States citizen.

2. I am 20 years of age.

3. I reside at 11212 Ada Avenue, Cleveland, Ohio.

4. On October 3, 2004, I filled out a voter registration form and gave it to a volunteer from the Greater Cleveland Voter Registration Coalition. A copy of the registration form which I filled out is attached to this Affidavit.

5. I have never received any communication from the Cuyahoga County Board of Elections ("BOE") indicating whether or not I am a registered voter.

6. After waiting a reasonable time to hear back from the Board, I attempted to call them. I placed the call about noontime on a weekday. No one answered the phone.

7. I wish to vote in the upcoming November 2, 2004 presidential election.

8. To my knowledge, I am still not registered to vote so that I can vote in the November 2, 2004 election.

FURTHER AFFIANT SAYETH NAUGHT.

[Signature]

Sworn to before me this 23rd day of October 2004.

[Signature]

Notary Public

MOLLY WIESE, ATTY.

NOTARY PUBLIC • STATE OF OHIO

My Commission Has No Expiration Date

Section 147.03 O.R.C.
Are you a U.S. citizen?  ☑ Yes  ☐ No (Required)

Will you be 18 years of age on or before the next general election?  ☑ Yes  ☐ No (Required)

If you answered NO to either of the questions, do not complete this form.

Full Name: Chauntia Marie Dimmings

Apt. or Lot #: 11212 Ada Ave

City or Post Office: Cleveland

County: Cuyahoga

Date of Birth (Required): 17-8-44

Ohio driver’s license No. OR last 4 digits of Social Security No. (required): 1301

Phone No. (voluntary): 2164315839

Address Change Only - Previous Address:

Final Rural or Mailing Address (if necessary): 11212 Ada Ave

City: Cleveland

County where you live: Cuyahoga

Address Change Only - Previous Address:

House Number and Street: 11212 Ada Ave

State: Ohio

City: Cleveland

County: Cuyahoga

Date signed: 10/3/04

Signature of Applicant: Chauntia Marie Dimmings

ID Number:

Under penalty of perjury I am a citizen of the United States, will have lived in this state for 30 days immediately preceding the next election, be at least 18 years of age at the time of the general election.

If a minor, have consent of parent or legal guardian.

Authorized Signature: Chauntia Marie Dimmings

Date signed: 10/3/04

Address, not in system as DIMMININGS
AFFIDAVIT OF MOLLY WIESER

County of Cuyahoga )

ss:
State of Ohio )

MOLLY WIESER, being duly sworn, hereby declares the following as true:

1. I am a United States citizen, over 18 years of age, and reside at 1828 West 45th Street, Ohio. I am an attorney admitted to the Bar of the State of Ohio.

2. On October 23, 2004, I met in person with Chauntia M. Dimmings, one of the plaintiffs in this action, for the purposes of notarizing her affidavit. Ms. Dimmings is African-American.

3. On October 24, 2004, I met in person with Roberto Marrero, one of the plaintiffs in this action, for the purposes of notarizing his affidavit. Mr. Marrero is Latino.

4. On October 24, 2004, I met in person with Michael Harwell, one of the plaintiffs in this action, for the purposes of notarizing his affidavit. Mr. Harwell is African-American.

FURTHER AFFIANT SAYETH NAUGHT.

________________________
MOLLY WIESER

Sworn to before me this 24th day of October, 2004.

________________________
Notary Public

Fred J. Livings
My commission has no expiration
AFFIDAVIT OF HAROLD F. SMITH

County of Cuyahoga )
State of Ohio )

ss:

HAROLD F. SMITH, having been duly sworn, hereby declares the following as true:

1. I am a United States citizen.

2. I am 59 years old.

3. I reside at 9416 Garfield Boulevard, Garfield Heights, Ohio, 44125.

4. On June 6, 2004, in front of Dave’s Supermarket on Harvard Avenue, Cleveland, I filled out a voter registration form, and gave it to a volunteer from the Greater Cleveland Voter Registration Coalition who was signing up people to vote.

5. I have never received any written communication from the Cuyahoga County Board of Elections about my voter registration form.

6. To my knowledge, I am not on the list of registered voters. I don’t know why I am not on the list of registered voters.

7. A copy of the voter registration form that I filled out and signed is annexed hereto as Exhibit A.

8. I strongly wish to vote in the upcoming presidential election on November 2, 2004.

FURTHER AFFIANT SAYETH NAUGHT.

[Signature]

Sworn to before me this 23rd day of October 2004.

[Signature of Notary Public]

Notary Public

MICHAELE P. HOFFMEIER, A.T.T.
NOTARY PUBLIC • STATE OF OHIO
My commission expires on expiration date
Secured 14/03 O.R.C.
AFFIDAVIT OF ANDREA K. PRICE

County of Cuyahoga )
State of Ohio ) ss:

ANDREA K. PRICE, having been duly sworn, hereby declares the following as true:

1. I am a United States citizen.

2. I am over 18 years of age.

3. I reside at 18706 Invermere Road, Cleveland, Ohio 44122.

4. On October 23, 2004 I spoke with Vanita Meredith in person.

5. On October 24, 2004 I spoke with Jolena Oglesby in person.

6. Both Vanita Meredith and Jolena Oglesby are African American.

FURTHER AFFIANT SAYETH NAUGHT.

[Signature]

Andrea K. Price

Sworn to before me this 24th day of October, 2004.

[Signature]
Notary Public
AFFIDAVIT OF ROBERTO MARRERO

County of Cuyahoga  )
ss:
State of Ohio  )

ROBERTO MARRERO, having been duly sworn, hereby declares the following as true:

1. I am a United States citizen.

2. I am 18 years of age.

3. I reside at 3519 West 98th Street, Cleveland, Ohio 44102

4. On January 3, 2002, I submitted a voter registration form while I was at the Department of Motor Vehicles to get my driver's license.

5. Just to make sure I was registered, in August 2004, I again filled out and submitted a voter registration form to the Cuyahoga County Board of Elections.

6. I have not has received notification that I am registered to vote. Thus, to my knowledge, I am not listed as a registered voter with the Board of Elections.


FURTHER AFFIANT SAYETH NAUGHT.

ROBERTO MARRERO

Sworn to before me this 24th day of October 2004.

Notary Public

MOLLY WIESER, ATTY.
NOTARY PUBLIC • STATE OF OHIO
My Commission Has No Expiration Date
Section 147.03 O.R.C.