

**FIRST AMENDMENT TO SETTLEMENT AGREEMENT**

This agreement (the "First Amendment") amends the settlement agreement (the "Settlement Agreement") of January 10, 2014 by and between Judicial Watch, Inc. and True the Vote (collectively, "Plaintiffs") and Ohio Secretary of State Jon Husted, in his official capacity ("Defendant"), which resolved the litigation captioned *Judicial Watch, Inc. and True the Vote v. Husted*, United States District Court for the Southern District of Ohio Case 2:12-cv-00792.

**AGREEMENT**

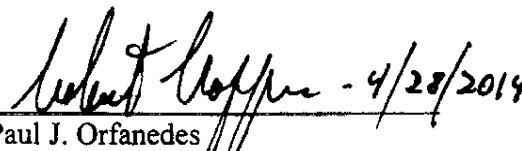
Pursuant to Section 8 of the Settlement Agreement, by mutual agreement and for good and valuable consideration, the parties to the Settlement Agreement hereby agree that:

- A. Section 2(i) of the Settlement Agreement is stricken in its entirety and replaced with the following provision:

To direct boards of elections to send confirmation notices annually to voters who: (a) did not vote in an election during the period beginning with the regular primary election held in the second calendar year preceding the current calendar year and ending with the regular primary election held in the current calendar year, and (b) did not engage in any other voter-initiated activity (e.g., filing a voter registration form) during that same time period; and also to query boards of elections on a reasonably regular basis as to whether this direction is being followed. For purposes of this section, "regular primary election" means the primary election held pursuant to R.C. 3501.01(E)(1) and/or (2), or any successor section, or the date said primary would have been held pursuant to that section if no primary is actually held.

- B. This First Amendment shall be effective upon the date it is executed by the Plaintiffs.
- C. This First Amendment is incorporated into the Settlement Agreement and they are made one and the same document, subject to all remaining terms of the Settlement Agreement.
- D. This First Amendment may be executed in multiple counterparts, and a faxed or emailed signature shall be deemed as valid as an original.

AGREED TO AND ACCEPTED:

 - 4/28/2014  
 Paul J. Orfanedes  
 Robert Popper  
 Chris Fedeli  
 JUDICIAL WATCH, INC.  
 425 Third Street S.W., Ste. 800  
 Washington, DC 20024

[signatures continue on following page]

J. Christian Adams  
ELECTION LAW CENTER, PLLC  
300 N. Washington Street, Ste. 405  
Alexandria, VA 22314

David R. Langdon  
Joshua B. Bolinger  
LANGDON LAW LLC  
8913 Cincinnati-Dayton Rd.  
West Chester, Ohio 45069

*On Behalf of Plaintiffs Judicial Watch, Inc.,  
and True the Vote*

OHIO SECRETARY OF STATE JON  
HUSTED

By:



Jack Christopher  
Deputy Secretary of State and  
Chief Legal Counsel  
180 E. Broad Street, 15th Floor  
Columbus, Ohio 43215

*On behalf of Defendant Ohio Secretary of  
State Jon Husted*