EXHIBIT E
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

GEORGIA COALITION FOR THE
PEOPLES’ AGENDA, INC., as an
organization, et al.;

Plaintiffs,

v.

BRIAN KEMP, in his official capacity as
Secretary of State for the State of
Georgia,

Defendant.

Civil Action
Case No. 1:18-cv-04727-ELR

DECLARATION OF DIANA COFIELD

Pursuant to 28 U.S.C. § 1746, I, Diana Cofield, hereby declare as follows:

1. I have personal knowledge of the matters stated herein, am over the age of 18 years, and am competent to make this declaration.

2. I was the deputy registrar for the Troup County, Georgia Board of Elections and Registration for approximately ten (10) years until I retired on August 28, 2018. Prior to serving as deputy registrar, I worked for the Troup County Board of Elections and Registration for approximately four (4) years in other capacities.
3. As the deputy registrar for the Troup County Board of Elections and Registration, I was responsible for processing voter registration applications, updating the status of voter registrations, supervising the work of more junior employees in the office who processed voter registration applications, and otherwise performing the duties assigned to me by the Elections Supervisor.

4. In my capacity as a deputy registrar, I attended trainings offered by the Georgia Secretary of State’s office as well as in-house trainings provided by the Troup County Elections Supervisor.

5. Based upon my experience and training as a deputy registrar with the Troup County Board of Elections and Registration, I am familiar with how voter registration applications are processed, how voter registration files are updated on Enet, and how applications that are put into “pending” status because of the failure to match identity or citizenship data on file with the Georgia Department of Drivers Services (DDS) or Social Security Administration (SSA) are handled.

6. When the Troup County Board of Elections and Registration receives paper voter registration forms from applicants, including those received from applicants through the mail and those submitted by organizations or individuals conducting third party voter registration drives, the information concerning the applicant’s identity and citizenship on the registration form is manually entered
into the state’s electronic voter registration database known as “Enet” by staff in the registrar’s office.

7. After the information from the registration form is entered into Enet, it is electronically compared against data on file with the DDS or SSA to determine whether the identity and citizenship information entered into Enet from the registration form matches information contained in the DDS or SSA databases concerning the identity and citizenship status of the applicant. This matching process has been commonly referred to as the “exact match” voter registration process in Georgia.

8. When matching registration data against the DDS database, the automated system compares the following fields: first name, last name, date of birth, driver’s license or state ID number, and citizenship status. When matching registration data against the SSA database, it compares the following fields: first name, last name, date of birth, and last four digits of the social security number.

9. In the event that the data in one of the fields of the DDS or SSA databases does not match exactly with the information from the voter registration application entered into the Enet system by the registrar’s office, Enet sends a report to the county registrar’s office. The report identifies whether the
information in the application failed to match with information in the DDS or the SSA database.

10. If a “no-match” applicant provided a driver’s license or state ID number on the voter registration application, and information in one of the data fields fails to match the information in the DDS database, the report produced by Enet identifies the exact fields that failed to match, including if there is information in the DDS database indicating that the applicant obtained a Georgia driver’s license when he or she was not a United States citizen.

11. If a “no-match” applicant provided the last four digits of a social security number on the voter registration application, and information in one of the data fields failed to match the information in the SSA database, the report produced by Enet does not provide any details to the local registrar about which fields failed to match. The report to the local registrar only returns a code “Z,” which indicates that the information from any or all of the data fields did not match to one or more records in the SSA database.

12. In some cases, the voter registration applicant’s identity or citizenship information will not match the data on file with DDS or SSA because of an error made when the data is entered into Enet by the registrar’s office or because of an error in the DDS or SSA database.
13. In addition, a voter registration applicant who is a naturalized United States citizen at the time they submit a Georgia voter registration application and is eligible to vote can be incorrectly flagged as a potential non-citizen in Enet because the registration information is compared against DDS citizenship data that is not automatically updated when a Georgian who obtained a driver’s license as a non-citizen becomes a naturalized United States citizen. As a result of using outdated DDS data as the basis for comparison, United States citizens can be flagged as potential non-citizens and placed in “pending” status even though they are in fact eligible to vote.

14. During my tenure as a deputy registrar for the Troup County Board of Elections and Registration, I became aware of several instances where applicants were put into pending status due to the failure to verify for citizenship even though they had submitted a copy of their naturalization certificate with their voter registration form.

15. I made this discovery as a result of my practice of reviewing the original applications and any accompanying documents submitted by the applicant with their registration form if the applicant was put into pending status.

16. To the best of my knowledge, I do not recall receiving any training before my retirement from the Troup County Board of Elections and Registration
mandating that I review the original voter registration applications and accompanying documents for pending voters to determine whether they had submitted proof of their identity or citizenship with their voter registration form rather I chose to do this because I believed it was a good practice to follow.

17. I declare under penalty of perjury that the foregoing is true and correct. Executed this 25 day of October 2018 at LaGrange, Georgia.

Diana Cofield
General Information

Court
United States District Court for the Northern District of Georgia;
United States District Court for the Northern District of Georgia

Federal Nature of Suit
Civil Rights - Voting[441]

Docket Number
1:18-cv-04727