Exhibit A
October 8, 2013

Delivered through Counsel, Harry Joseph (Skip) Philips, Jr.
Secretary Kathy Kliebert
Or designated Official Custodian of Records
State of Louisiana Department of Health & Hospitals
P.O. Box 629
Baton Rouge, LA 70821-0629

Re: Public Records Request for Voter Registration Documents

Dear Ms. Kliebert,

This letter is addressed to you or your designee, as the Official Custodian of Records for the Department of Health and Hospitals (“DHH”). If you are not the Official Custodian of Records, however, please forward this request to the person who serves in that capacity, or alternatively, provide me the name and mailing address of that person.

As you know, a permanent injunction was issued on January 23, 2013 by the United States District Court for the Eastern District of Louisiana in Scott, et al. v. Schedler, et al., Civil Action No. 11-926, requiring that DHH comply with the National Voter Registration Act of 1993 (“NVRA”).

We write to request copies of documents regarding voter registration activities conducted by DHH pursuant to Section 7 of the NVRA. In particular, we request copies of all the public records listed below pursuant to the Louisiana Public Records Act, La. Rev. Stat. Ann. § 44:1 et seq.:

1. Any and all documents, issued since October 15, 2012 relating to the NVRA, DHH’s compliance with the NVRA, and/or voter registration, including specifically documents related to all DHH programs/offices required to comply with Section 7 of the NVRA, including Medicaid, WIC, and any other offices that process Medicaid or WIC forms (such as Medicaid Application Centers).

2. Copies of any and all policies from the Administrative Manual that relate to the NVRA, NVRA compliance, and/or voter registration current and/or in use since October 15, 2012, including but not limited to such policies issued to Medicaid and WIC offices, and any other offices that process Medicaid or WIC forms (such as Medicaid Application Centers).

[00034851.DOC 2]

805 15th Street NW • Suite 250 • Washington, DC 20005
(202) 546-4173 T • (202) 733-4762 F • www.projectvote.org
3. Copies of any and all Administrative Memorandum related to the NVRA, NVRA compliance, and/or voter registration issued since October 15, 2012, including but not limited to such policies issued to Medicaid and WIC offices, and any other offices that process Medicaid or WIC forms (such as Medicaid Application Centers).

4. Copies of any and all DHH policy documents or directives issued since October 15, 2012 addressing when, how, and/or under what circumstances voter registration applications are to be provided to DHH clients.

5. Copies of any and all types of letters sent to clients regarding voter registration in use since October 15, 2012.

6. Screen shots from any and all online benefits applications used by DHH currently, and/or since October 15, 2012, addressing voter registration, including but not limited to any screen shot showing questions about voter registration, and/or linking to a voter registration website or application.

7. Copies of any and all of DHH policy documents issued since October 15, 2012 addressing DHH’s policies and procedures for distributing voter registration applications during benefits transactions are initiated online.

8. Copies of any and all DHH’s policies, issued since October 15, 2012, addressing the assistance that employees should or must provide to benefits clients or applicants related to voter registration.

9. Copies of any and all training materials, issued since October 15, 2012 used by DHH, and/or any of its agency offices (including offices such as Medicaid Application Centers), to train employees on performing the duties required for voter registration conducted under the NVRA. We further request documents indicating the dates, agenda, and attendance of all trainings provided to any DHH staff or DHH contractors that relate to the voter registration program from January 2013 to the present.

10. Electronic records identifying the number of (a) applications for service or assistance; (b) applications for recertification or renewal; and (c) requests for change of address, received by DHH or an agency offices (including offices such as Medicaid Application Centers), from January 2013 to the present. If available, we would like to receive the information broken down by month and by office. To the extent electronic data is unavailable, please provide hard copies.

11. Electronic records identifying the number of completed voter registration applications forwarded or otherwise sent/transmitted by DHH offices (including offices such as Medicaid Application Centers) to the appropriate offices for
registrars of voters from January 2013 to present. If possible, we would like to receive the information broken down by month and by office. To the extent electronic data is unavailable, please provide hard copies.

Please provide the foregoing information electronically, or on a flash drive, CD, or disk. Please advise me if the fee for this request exceeds $100.

It is our understanding that you will receive this letter on or before October 11, 2013. To the extent that you have any objection(s) to the production of the requested information, please provide, within three days of the receipt of this letter, exclusive of Saturdays, Sundays, and legal public holidays, written reasons setting forth the bases for your position (by October 17, 2013). See R.S. 44:32(D). If you fail to object within that time period, you are required to provide the requested documents within five days of the receipt of this written request, exclusive of Saturdays, Sundays, and legal public holidays (by October 21, 2013).

Thank you for your assistance. If you have any questions, please feel free to contact me via phone or email.

Sincerely,

-S-

Sarah Brannon
Director, Public Agency Voter Registration Program
Project Vote
805 15th Street NW, Suite 250
Washington DC 20005
202-546-4173 x303
sbrannon@projectvote.org

cc: Natasha Korgaonkar
Assistant Counsel, Political Participation Group
NAACP Legal Defense and Educational Fund, Inc.
40 Rector Street, 5th Floor
New York, NY 10006
212-965-2236
nkorgaonkar@naacpldf.org

Ronald L. Wilson
701 Poydras Street, Suite 4100
New Orleans, LA 70139
cabral2@aol.com
Israel David
Fried Frank
One New York Plaza
New York, NY 10004
israel.david@friedfrank.com